



SPANDANA SOCIAL SERVICE ASSOCIATION

164/సి2, ఐ-కొండ రోడ్ ఎడ్డుల మార్కెట్ ఎదురుగా, ఎమ్మిగూరు-518 360 కర్నూలు జి. (ఎ.పి) సెల్ : 9885813813

మానవత్వముతో స్పందించే మీ హృదయం - అందరికీ తోడు నీడగా అందించండి మీ హస్తం

Ref:- No.RG-8(2)/2025-ADV-FEA(1) Dt:07-04-2026.

Dt. 11.05.2026

To
The Joint Advisor (CA),
Telecom Regulatory Authority of India,
NEW DELHI.

/Through Proper Channel

Respected Sir,

Sub: Counter-Comments on the Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations 2026.

Ref:- No.RG-8(2)/2025-ADV-FEA(1) Dt:07-04-2026 received through mail
dt:23-04-2026. ***

1. Digital Inclusion Should Be a Choice, Not Forced

TSPs say data packs are needed for Digital India and to encourage digital usage.

Our view: People should not be forced to pay for data if they don't need it. Low-income users should have the option to use only voice and SMS at affordable prices. Otherwise, they are unfairly burdened. While promoting digital adoption is important, consumers should retain the freedom to choose services according to their needs and financial capacity. Many low-income users, senior citizens, and basic phone users primarily require voice and SMS services. Making data compulsory in recharge packs imposes an unnecessary financial burden on such consumers. Digital inclusion should encourage access, not force expenditure on services that are not required

2. Spam and Security Should Be Managed by TSPs

TSPs say cheaper packs may increase spam.

Our view: Controlling spam is the responsibility of telecom companies using proper technology and regulations. Genuine users should not be punished by removing affordable options. Concerns relating to spam calls and fraudulent activities should be addressed through stronger technological safeguards, network-level filtering, and regulatory enforcement by telecom service providers. Genuine consumers should not be deprived of affordable voice-only recharge options merely because of spam-related concerns. The responsibility of preventing misuse lies with telecom operators and enforcement mechanisms, not with ordinary users.

3. Price Should Reduce if Data is removed

TSPs say costs are fixed, so prices cannot change much.

Our view: This is not correct. Data is a major part of the package. If data is removed, the price should reduce accordingly. Charging high prices for voice-only plans is unfair. Telecom operators argue that operational costs remain fixed; however, data services form a substantial component of bundled recharge plans. If consumers opt out of data services, the tariff should be proportionately reduced. Charging nearly the same price for voice-only plans as bundled voice-and-data plans is unreasonable and unfair to consumers who do not use mobile internet services.

4. Equal Validity Options for Everyone

TSPs say current long-validity plans are enough.

Our view: This is not fair to low-income users. Data users get many recharge options (28, 56, 84 days), but voice-only users do not. The same validity options should be available for voice-only plans. Consumers using voice-only services should receive the same range of validity options that are currently available to data users, such as 28-day, 56-day, and 84-day plans. Restricting affordable long-validity options only to bundled data packs discriminate against low-income and non-internet users. Equal flexibility in recharge validity is necessary to ensure fair access for all categories of consumers.

5. Data Should Not Be Forced in the Name of Safety

TSPs say data helps in emergencies.

Our view: Many users have basic phones and do not use such features. For smartphone users, companies can provide a “data lock” option instead of forcing paid data packs. Safety should not be used as an excuse to increase costs. While internet access may assist in certain emergency situations, many consumers continue to use basic phones or do not require mobile data services. Safety concerns should not be used as a justification to make data services compulsory. For smartphone users, telecom providers may instead offer optional controls such as “data lock” or “data disable” features, allowing consumers to avoid unwanted data usage while still accessing emergency services when needed.

6. Information Should Reach All Consumers

TSPs say information is available on websites and apps.

Our view: Many people do not use apps or websites. These plans should also be clearly shown at shops and informed through SMS in local languages so that everyone is aware.

Greetings from "CAG Member"

With warm regards.

Yours faithfully

B. Sarada

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