

## **Counter comments by Upobhokta Sanrakshan and Kalyan Samiti Kanpur (CAG member)**

### **TELECOM CONSUMERS PROTECTION (THIRTEENTH AMENDMENT)**

#### **1. Ensuring Inclusion for Marginalized Segments**

The proposed amendment is a vital step toward digital and financial inclusion. Currently, low-income users, elderly citizens, and those in rural areas using feature phones are being unfairly penalized by a lack of shorter-duration, voice-only options. By mandating parity in validity periods, TRAI ensures that those who do not need data are not "compelled to purchase bundled packs," leading to avoidable expenditure.

#### **2. Addressing the Inadequacy of Current Implementation**

While the 12th Amendment required at least one voice/SMS pack, Telecom Service Providers (TSPs) have largely restricted these to long-term validities (e.g., 84 or 365 days). This creates a high "one-time payment" barrier that is challenging for low-income consumers who need to recharge as per their immediate requirements.

**The Solution:** Mandating a corresponding voice-only STV for every unique validity period offered for bundled data packs is the only way to restore "regulatory intent of consumer choice".

#### **3. Correction of Disproportionate Pricing**

It is noted that even when voice-only packs were introduced, TSPs initially fixed prices that were not "commensurate" with the removal of data benefits.

**Support for Proportional Pricing:** I strongly support the provision that these STVs must be priced with a "largely proportional reduction in tariff" compared to bundled data packs. This prevents consumers from being forced to pay for services they do not use.

#### **4. Enhancing Transparency and Accessibility**

The requirement for these packs to be "prominently displayed and made easily accessible" across all touchpoints (retail outlets, websites, apps) is crucial. This ensures that "non-tech savvy" individuals are not kept in the dark about more affordable, relevant options.

#### **Conclusion**

The proposed amendment fulfills the objective of "ensuring fair, equal and non-discriminatory choices" for all consumers, regardless of their data requirements. I urge the Authority to finalize these regulations to protect the interests of the most vulnerable sections of the telecom subscriber base.