

நுகர்வோர் சட்டத்தின் பலன்! பாதிக்கப்பட்டோருக்கு நலன்!  
Reg No : 35/99

**Women Consumer Protection Association**  
**மகளிர் நுகர்வோர் பாதுகாப்புச் சங்கம்**

Member - Consumer Coordination Council - New Delhi  
Member - Federation of Consumer Organizations Tamilnadu & Pondicherry (FEDCOT)

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WCPA/58/2026-2027

Date. 11.05.2026

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

Respected Sir,

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

Ref.: TRAI Draft Notification No. RG-8/(2)/2025-ADV\_FEA-I dated 07.04.2026.

### Greetings From WCPA,

We welcome the Authority's intent to protect consumer interests through the Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026. We wish to submit the following counter-comments to address the justifications provided by TSPs against the proposed regulations.

#### 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-** The logic that "forced usage equals inclusion" is flawed because true digital inclusion requires readiness, affordability, and utility. Forcing data packs on those who cannot use them does not create a "Digital India"; it creates a "Digitally Burdened" India.

#### 2.Spam and Security Should Be Managed by TSPs

TSPs say cheaper packs may increase spam.

**Our View -** Security is a Network Responsibility, not a Consumer Tax. The claim that lower prices inevitably lead to more spam is a deflection of a TSP's core regulatory and technical obligations. Security should be managed at the infrastructure level, not through financial exclusion.

### **3.Price Should Reduce if Data is Removed**

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

**Our View** If data has no cost value, TSPs should give it away for free. Since they charge for 'Data Top-ups,' data clearly has a price. Removing it from a bundle must, by logical extension, reduce the total cost."

### **4.Equal Validity Options for Everyone**

TSPs say current long-validity plans are enough.

**Our View** -The current market reality lacks parity and discriminates against non-data users. Consumers purchasing bundled data packs are offered a wide array of validity options (e.g., 28, 56, 84, and 365 days). Voice-only users are routinely denied these long-validity benefits, forcing them into frequent, economically inefficient recharges. We strongly support the draft amendment's mandate that for every unique validity period offered for a bundled pack, a corresponding Voice and SMS-only Special Tariff Voucher must be made available.

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

TSPs say data helps in emergencies.

**Our View** -Safety should be a default feature of a network, not a justification for a mandatory price hike. Using 'emergencies' to sell data packs is marketing, not public service. Safety is a network's duty, not a premium subscription. Using a person's security as an excuse to sell unwanted data is price gouging disguised as protectio

### **6.Information Should Reach All Consumers**

TSPs say information is available on websites and apps.

**Our View** -A significant section of consumers may not regularly access digital platforms due to connectivity limitations, low digital literacy, language barriers, disability-related accessibility concerns, or lack of awareness



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