



भारतीय प्रौद्योगिकी एवं उद्यमी विकास संस्थान

INDIAN INSTITUTE OF TECHNOLOGY & ENTREPRENEUR DEVELOPMENT (IITED)

(AN INSTITUTE OF RESEARCH, ACTION FOR DEVELOPMENT)
ISO 9001: 2018 CERTIFIED ORGANISATION
वेबसाइट /Website - www.iited.in

Ref: - D-864/TRAI/Reg/2026-27

Date: - 13-08-2026

To,

The Advisor (QoS-I)

Telecom Regulatory Authority of India (TRAI)
World Trade Center, Tower-F, Nauroji Nagar,
New Delhi - 110029

Email: adv-qos1@trai.gov.in

Subject: Comments and suggestions in consumer interest on the Consultation Paper regarding draft amendments to 'The Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024'.

Dear Sir/Madam,

We welcome TRAI's proactive measures to protect consumer interests, enhance transparency, and enforce stricter Quality of Service (QoS) standards across telecom and broadband networks.

Keeping in mind the everyday challenges faced by consumers, our key suggestions and comments regarding the draft amendments are detailed below:

Key Suggestions & Justifications

S. No.	Draft Provision / Subject	Our Suggestion (Consumer Perspective)	Justification & Benefits
1.	Reg. 10(1) - (ii) (Resolution of billing complaints)	We strongly support reducing the timeline for resolving billing and charging complaints from 4 weeks to 1 week (7 days) .	Consumer funds often get blocked due to incorrect billing. In the digital era, automated systems should enable refunds or resolutions within 7 days.
2.	Reg. 6(1) - (iv) & Reg. 9(1) - (xi) (Compensations for network outages)	Automatic provisioning of proportional rent rebates or validity extensions for outages exceeding 24 hours is a crucial step.	Consumers should not have to manually apply or run after service providers to get their rightful compensation for service loss.
3.	Reg. 7(1) - (vii) (Silence Call Rate $\leq$ 1%)	Stricter monitoring and penalties should be enforced for silent calls (RTP gaps $\geq$ 4 seconds).	Consumers frequently experience periods during calls where audio completely cuts off without dropping the call, wasting their talk time and call balance.

Head Office: IICR Campus, Near Mangla Traders, Shakti Chowk, Bijnor U.P. Pincode No.- 246701, India

मुख्यालय:- आई0आई0सी0आर0 कैम्पस निकट मंगला ट्रेडर्स शक्ति चौक, बिजनौर (उ०प्र०) पिन-246701 भारत



Mob. No. 9412118240, Phone & Fax No. 01342-265992, E-mail:- iited_mngo@rediffmail.com



भारतीय प्रौद्योगिकी एवं उद्यमी विकास संस्थान

INDIAN INSTITUTE OF TECHNOLOGY & ENTREPRENEUR DEVELOPMENT (IITED)

(AN INSTITUTE OF RESEARCH, ACTION FOR DEVELOPMENT)
ISO 9001: 2018 CERTIFIED ORGANISATION
वेबसाइट /Website - www.iited.in

S. No.	Draft Provision / Subject	Our Suggestion (Consumer Perspective)	Justification & Benefits
4.	Schedule-I (para 3.2.2) (<i>Complaint registration during outages</i>)	Complaint facilities must remain open during network outages, or consumers should be automatically mapped to system-generated fault tickets .	Telecom companies often block users from registering complaints during major outages, depriving them of proof needed to claim rent rebates.
5.	Schedule-I (para 4.1.3) (<i>Complaint Services not available presently on network outage</i>)	presently on network outage for example in no network is available for 1 day than validity extended for 1 day, this provision may be made for strict by extending validity period three to four times of network outage	This is important for the benefit of the consumer
6.	Schedule-III (<i>Geospatial Coverage Map Accuracy $\geq$ 98%</i>)	Published coverage maps must accurately reflect actual indoor and outdoor ground realities.	Inaccurate maps mislead consumers into buying SIM cards or plans that lack network coverage inside their homes or offices.

Conclusion

We urge TRAI to enforce these rules strictly without granting lenient extensions to service providers. Furthermore, financial disincentives collected for non-compliance should directly translate into better infrastructure and service reliability for end-users.

Thanking You,

Yours sincerely,

(Mukul Kumar)
National Co Ordinator

