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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 on the Draft Amendments to the Standards of Quality of Service of Access and Broadband Services Regulations, 2024 – Consumer Interest Perspective
Reference: TRAI Consultation Paper on Draft Amendments to the Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024, dated 5 August 2026**

Respected Sir

I appreciate the opportunity provided by the Telecom Regulatory Authority of India (TRAI) to submit comments and suggestions on the proposed amendments to the Quality-of-Service Regulations.

The proposed amendments are a significant step towards improving transparency, accountability and quality of telecom services. In particular, the proposed provisions relating to geospatial coverage maps, network outages, declared download/upload speeds, complaint registration, Quality of Experience (QoE) and financial disincentives have considerable potential to strengthen consumer protection.

However, from the perspective of consumer welfare, I respectfully submit the following suggestions for consideration:

1. Consumer Compensation Should Be Automatic

The draft provides for proportional rent rebate or extension of validity where a significant network outage continues for more than 24 hours.

It is suggested that compensation should be automatic, transparent and system-generated, without requiring the consumer to submit a separate request or complaint.

Further, the compensation mechanism may be considered for prolonged and material degradation of service, and not only complete service outages, particularly where consumers are paying for a declared level of service.

2. The 24-Hour Threshold for Compensation May Be Reconsidered

At present, the proposed rebate mechanism is linked to outages continuing for more than 24 hours.

From a consumer perspective, a telecom service may be essential for education, employment, digital payments, healthcare, emergency communication and business activities. Therefore, waiting for 24 hours before any consumer remedy becomes available may cause significant hardship.

I suggest that TRAI may consider a graded compensation mechanism, for example:

- shorter outage periods – service validity extension or proportionate compensation;
- prolonged outages – higher compensation;

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- very prolonged outages – full proportional refund for the affected period.

This would create a stronger incentive for service providers to restore services promptly.

3. Coverage Maps Should Reflect Actual Consumer Experience

The draft proposes technology-wise coverage maps and a minimum accuracy benchmark of 98%. It also provides for consumer feedback and validation through TRAI mechanisms.

This is a welcome measure.

However, consumers should be able to clearly distinguish between:

“Signal Coverage” and “Usable Service Quality.”

A strong signal does not necessarily guarantee satisfactory voice or data service. Therefore, coverage maps should, wherever technically feasible, also display meaningful service-quality indicators such as:

- typical download speed;
- typical upload speed;
- latency;
- call quality;
- call-drop/silence-call experience; and
- areas with persistent congestion.

This would enable consumers to make an informed choice before purchasing or changing a telecom service.

4. Coverage Maps Should Be Updated More Frequently

The draft permits coverage maps to be updated following network changes, but in any event not later than three months after such change.

For consumers, three months can be a long period, particularly in rapidly changing urban and semi-urban networks.

It is therefore suggested that:

- major changes in coverage should be reflected within a shorter prescribed period;
- the date of the last update should be prominently displayed;
- significant changes should carry an appropriate “recently updated” notification; and
- consumers should be able to view the history of major coverage changes.

5. Consumer Complaints Should Remain Accessible During Network Outages

The proposed amendment appropriately requires service providers to keep complaint registration facilities accessible even during network-wide or localized disruptions, and affected subscribers may either register complaints or be automatically mapped to system-generated fault tickets.

I strongly support this provision.

However, it is suggested that the regulations should also require service providers to provide the consumer with:

1. a unique complaint/fault-ticket number;
2. expected restoration time, wherever reasonably determinable;
3. periodic status updates for prolonged outages; and
4. confirmation when the issue has been resolved.

This would substantially improve consumer confidence and accountability.

6. Declared Internet Speed Should Be Meaningful to Consumers

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The draft proposes that service providers maintain their declared typical download and upload speeds and notify affected customers if measured performance falls below the declared speed.

It is suggested that advertisements and tariff plans should present speed information in a simple, standardized and consumer-friendly format.

Consumers should be able to easily understand:

- the technology applicable to the speed;
- the typical speed;
- the minimum/expected level of service, where prescribed;
- whether the speed is dependent on network conditions; and
- the methodology used for declaring the speed.

This will reduce the possibility of consumers making decisions based on headline speed figures that may not represent their actual experience.

7. Consumer-Based Testing Should Be Given Greater Importance

The draft recognizes the use of consumer feedback and TRAI tools for validating service performance.

It is suggested that anonymized and statistically significant consumer-generated data from the TRAI My Speed application and other authorized mechanisms should be given greater weight in assessing actual Quality of Experience.

Where a persistent and significant difference exists between the service provider's declared performance and consumer measurements, the service provider should be required to investigate and take corrective action within a defined period.

8. Quality of Experience Score Should Be Publicly Comparable

The proposed amendment introduces a Quality of Experience Score (QoES) based on network performance, consumer service and consumer perception.

This is an important consumer-centric initiative and is strongly supported.

However, TRAI may consider publishing the QoES in a simple comparative format, such as:

- Overall QoE Score;
- Network Performance Score;
- Customer Service Score;
- Complaint Resolution Score;
- Coverage Experience Score; and
- Consumer Satisfaction Score.

The information should be published in a manner that enables consumers to compare service providers within their area.

9. Financial Disincentives Should Ultimately Benefit Consumers

The proposed Regulation 16B introduces financial disincentives for non-compliance with provisions of the regulations, with higher amounts for repeated violations.

While stronger enforcement is welcome, it is suggested that TRAI should consider whether a portion of financial disincentives collected from service providers could be utilized for consumer-centric purposes, such as:

- consumer compensation;
- improvement of consumer grievance mechanisms;
- independent quality testing;

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- strengthening TRAI consumer-awareness initiatives; and
- development of better tools for consumers to verify service quality.

This would ensure that regulatory enforcement produces a visible consumer benefit.

10. Special Protection for Essential and Vulnerable Consumers

Telecom connectivity has become an essential service for many consumers.

The regulations may therefore consider appropriate priority mechanisms for identifying and addressing persistent service deficiencies affecting:

- remote and rural communities;
- areas with limited alternative connectivity;
- educational institutions;
- healthcare facilities;
- emergency services; and
- consumers who are particularly dependent on uninterrupted connectivity.

11. Force Majeure Exclusions Should Be Narrowly Defined

The draft permits recorded and reported force majeure incidents to be excluded from certain compensation calculations.

It is suggested that force majeure should be interpreted narrowly and should not automatically exclude consumer remedies.

Service providers should be required to demonstrate:

- the nature of the event;
- the geographical area affected;
- the duration of the impact;
- the steps taken to restore service; and
- why the event could not reasonably have been mitigated.

This would prevent legitimate consumer compensation from being denied without adequate justification.

12. Consumer-Friendly Disclosure Should Be Mandatory

The regulations should require telecom service providers to present important QoS information in a clear and easily understandable manner.

Technical information may continue to be available for regulatory purposes, but consumers should also receive a simplified summary showing:

Coverage | Typical Speed | Outages | Complaints | Restoration Time | Consumer Satisfaction | QoE Score

Such information should be easily accessible before purchase and throughout the subscription period.

13. Stronger Remedy for Persistent Non-Compliance

Where a service provider repeatedly fails to meet the prescribed QoS benchmarks, consumers should not have to continue paying the full price for materially deficient service.

TRAI may consider a mechanism under which persistent failure triggers:

- automatic consumer compensation;
- corrective action plans;

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- enhanced monitoring;
- publication of persistent non-compliance; and
- escalation of regulatory action for repeated failures.

Conclusion

Overall, the proposed amendments are a positive development towards strengthening Quality of Service regulation and consumer transparency. The provisions concerning coverage-map accuracy, outage reporting, consumer feedback, declared speeds, QoE and financial disincentives are particularly important.

However, the regulatory framework would be significantly stronger from a consumer-protection perspective if consumer compensation were more automatic, service-quality information were more transparent and comparable, consumer-generated data were given greater importance, and financial enforcement resulted in tangible consumer benefits.

I therefore respectfully request TRAI to consider the above suggestions while finalizing the proposed amendments, with the overarching objective that telecom consumers should receive transparent information, reliable service, timely grievance resolution and an effective remedy whenever the prescribed quality of service is not delivered.

Yours faithfully,

**(Shahwaz)
Project Manager**