



RJIL/TRAI/2026-27/180

15th September 2026

To,

Shri Tejpal Singh,

Advisor (QoS-I)

Telecom Regulatory Authority of India,

Tower-F, World Trade Centre,

Nauroji Nagar, New Delhi – 110029.

Subject: RJIL's counter comments on TRAI's Consultation Paper on Draft Amendments in The Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024.

Dear Sir,

Please find enclosed the counter comments of Reliance Jio Infocomm Limited (RJIL) on the TRAI's **Consultation Paper on Draft Amendments in The Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024** dated 05.08.2026.

Thanking you,

Yours Sincerely,

For **Reliance Jio Infocomm Limited**

Kapoor Singh
Guliani

Digitally signed by
Kapoor Singh Guliani
Date: 2026.09.15
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Kapoor Singh Guliani

Authorized Signatory

Enclosure: As above

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Reliance Jio Infocomm Limited's counter comments on TRAI's Consultation on draft amendment to 'The Standards of Quality of Service (QoS) of Access (wireline and wireless) and Broadband (wireline and wireless) Service Regulations, 2024'.

Preface:

1. Reliance Jio Infocomm Limited (RJIL) thanks the Authority for giving us an opportunity to offer counter comments on the stakeholder submissions to the Consultation Paper on Draft Amendments in The Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024.
2. At the very outset, we reiterate our submissions in our response to the consultation paper as detailed below:
 - a **The draft Amendment does not add any value to the QoS Regulations and should be withdrawn.**
 - b **The provisions pertaining to coverage maps are impractical to implement and do not add any value.**
 - c **The Authority should only provide broad principles for transparent, consumer-friendly coverage information, while leaving detailed methodology, tools, and validation processes to individual operators.**
 - d **The Call Silence Rate parameter is not suitable for data centric technologies and should not be included in the QoS Regulations.**
 - e **The provisions pertaining to prior intimation of network slicing and PRB based restrictions on slicing should not be implemented.**
 - f **SNO parameter should not be included in mandatory QoS compliance reporting with financial disincentives or rebates.**
 - g **There should be no change in timelines and other parameters of complaint handling.**
 - h **There is a need for wider discussion on Quality of Experience Score as not sufficient details have been provided in the consultation. Further, a single value output will not be appropriate measure for QoE.**
 - i **The provisions related to Financial Disincentives are perverse and should be removed completely from all Regulations.**
3. We further submit that as far as Coverage maps are concerned Global Regulators are moving away from RSRP and more focussed on realistic outdoor user experience and no global requirement is as strict as TRAI proposal in draft Amendment. We have had the opportunity to examine the comments by stakeholders, and our issue wise counter comments are in following table.

RJIL Counter comments to stakeholder submissions

S.No	Provision / Para Ref.	Stakeholder Comments	RJIL Counter-Comment with Justification and Reason
1	Para 4(a)(i) / Schedule-III Coverage-map accuracy ≥98%	A few consumer groups have supported the ≥98% benchmark and want it strengthened. They have also sought accuracy to be reported separately by technology and sought independent third-party validation.	1. We reiterate our submissions that while disclosure of coverage information may be retained as per the existing regulation, there is no justification in treating the maps based on a predictive model for compliance measures. 2. We reiterate that Coverage maps are generated using propagation models and are sensitive to the completeness, accuracy, and assumptions underlying the terrain, clutter, antenna, propagation, and network parameters. Such model-based predictions inherently involve uncertainty and therefore cannot be treated as ground truth or directly converted into a compliance measure or a Financial Disincentive metric. 3. Disaggregating the metric by technology and geography multiplies the number of instances at which an inherently probabilistic model is treated as a false/inaccurate 'reporting' failure carrying financial disincentive under Reg 16A. It compounds the underlying conceptual error rather than curing it. RJIL's position remains that the benchmark, accuracy KPI and validation-linked financial disincentive should be removed, with maps retained purely as a transparency disclosure whose methodology is left to the service provider. 4. The type of accuracy and measurement technologies proposed in the draft amendment are way and beyond any global precedent and are neither practical nor implementable. We have examined a large number of global jurisdictions and found no parallels to TRAI's proposal. It may not be out of place to mention that ARCEP website indicates that maps were last updated in 2024, whereas Indian operators are expected to update the map on real time basis with same accuracy level.

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2	Para 4(a)(iv) / 14(e) — Significant Network Outage trigger (>10% of LSA subscribers)	Some consumer groups have sought additional triggers at district/cluster/absolute-subscriber-count level in addition to TRAI proposed trigger for determining SNO.	1. We submit that the stakeholders proposals are not implementable technically and add no value to the Quality of Experience of telecom customers. 2. The stakeholder suggestion lacks any scientific basis and should be ignored along with the proposed changes in the draft amendment. We submit that subscriber-level attribution of an outage is not achievable at finer granularity than the LSA. Mobile subscribers are not tied to a fixed location, Handsets roam, are switched off, or sit in areas served by multiple overlapping cells, so there is no reliable real-time system to compute how many discrete subscribers experienced 'complete loss of service' even at LSA level, let alone at district or cluster level. 3. We submit that proposal in the amendment as well as consumer groups' suggestion is technically unworkable. Therefore, we reiterate that the Authority should continue with the existing district-level, 4-hour SNO definition (with no subscriber-count trigger at any granularity).
3	Para 4(a)(iv) / 6(a)(iv)-SNO rebate mechanism and 24-hour threshold	Some consumer groups have sought that compensation should be made automatic without any consumer request and at lower threshold than 24 hours.	1. At the very outset, we reiterate our submissions that the proposal for rebates is operationally unworkable to calculate per-subscriber for mobile services. 2. Further there are no global precedent on this kind of a proposal indicating that no Regulator has found this to be a feasible proposal considering the variables in provision on wireless services and the impossibility of identifying the affected customers. Accordingly, this proposal should be dropped as there is a possibility of disproportionate /arbitrary outcomes.

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			3. We submit that the stakeholder suggestions are akin to further enhancing the impractical nature of the proposal. We reiterate that when there is a challenge in identifying the users, passing of automatic rebate is not feasible. 4. We reiterate that it is not possible to determine, without a consumer complaint, exactly which subscribers were affected, for how long, and at what proportion of their billing cycle. Further, for a mobile network with roaming, multi-SIM use and device power-cycling, this is not a solved engineering problem today. Accordingly, we request that only the prevailing provisions should be continued with.
4	Para 5 / 14(j)- Silence Call Rate ($\leq 1\%$)	Some stakeholders have demanded strict enforcement of proposed measure on Silence Call Rate	1. RJIL reiterates that there is no 3GPP standard for 'silence' and the vendor equipment cannot measure the same. We reiterate our submissions that the current network equipment from several OEMs (including equipment already deployed in RJIL's own network) does not support real-time detection of continuous RTP gaps at the granularity the proposed parameter requires, and DTX/Comfort Noise Generation in normal call flows can register as false 'silence' under the current definition, making this proposal infeasible. Already the existing QoS contains Packet Drop Rate which is sufficient for performance monitoring and may please be continued rather than adding this additional performance indicator 2. Therefore, measuring compliance of an unvalidated, vendor-unsupported metric publicly before the underlying measurement capability exists across the industry risks creating a misleading public comparison between operators based on data quality differences rather than genuine service differences.

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			3. RJIL reiterates its request that this KPI be evaluated only through Independent Drive Tests and until a standardized, OEM-validated measurement method exists, it should not be discussed for inclusion in Regulation.
	Para 4(b) / 14(h) - PRB utilisation >80% (5G network slicing)	Some stakeholders have supported the proposed actions at reaching the 80% PRB threshold and some have gone further to demand mandatory automatic trigger for capacity augmentation and consumer notification.	1. At the outset, we submit that we have already submitted in detail how PRB utilization is not a suitable measure for QoE with full technical justification and request that the same should be considered and the proposed measure should be completely dropped. 2. We further submit that mandating automatic capacity augmentation on breach of a fixed PRB threshold assumes PRB utilisation is a reliable proxy for actual congestion or degraded customer experience, which is neither accurate nor scientifically valid. 3. As mentioned before, RJIL's own field and lab data show this assumption does not hold on Massive MIMO radios using MU-MIMO scheduling, where effective cell throughput may increase even > 200% at high nominal PRB utilisation because multiple users are being served simultaneously on the same resource blocks. Thus, the proposed restriction should be dropped. 4. A mandate that triggers consumer-facing congestion notifications purely on crossing 80% PRB regardless of whether users are actually experiencing degraded throughput would lead to wasteful network investment and generate false-alarm consumer notifications in exactly the high-efficiency scenarios the metric misreads as 'congested'.
6	Para 4(a)(xiv) / 6(a)(iv)-'Typical	Some stakeholders have requested TRAI to prescribe a mandatory methodology	1. We reiterate our submissions that considering the globally accepted facts that it is neither possible nor technically feasible to guarantee a minimum wireless speed; this

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	speed' methodology	for deriving 'typical speed' from actual busy-period network measurements, rather than leaving the reference value to operator discretion, to prevent operators declaring an artificially low typical speed.	parameter should be kept only as a disclosure requirement as per the existing requirements and no changes should be carried out. 2. RJIL reiterates its submissions that a 100% compliance benchmark against any declared reference speed is not achievable given factors genuinely outside operator control viz. device capability, indoor/outdoor location, momentary congestion, external interference, far end server congestion, local administration issue and submarine-cable or backhaul related events that are out of an operator's control. 3. We submit a prescriptive regulatory mandate does not address these issues and in fact avoids considering these challenges. 4. We submit that parameters that can be affected by so many variables that are not controlled by the service provider should not be a part of the QoS regulations at the very outset. 5. Instead the Authority should recognize that the need of providing flexibility to the operators to account for genuinely heterogeneous network conditions across circles and technologies. 6. We once again submit that this parameter should be treated as monitoring/disclosure rather than mandatory compliance. This will address the transparency concern of consumer groups without creating unnecessarily inflexible benchmarks.
7	Para 7(a)- Billing/charging	Some stakeholders have supported the reduction to	1. RJIL reiterates its submission that sufficient time is required to investigate the complex issues pertaining to multi-party disputes (roaming, aggregators, payment gateways) and

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	complaint resolution (4 weeks to 1 week)	one week, citing digitised billing and centralised, automated systems as making the shorter timeline achievable.	a short timeline risks premature or incorrect closures. Thus, no changes should be made in the Regulations. 2. We are constrained to highlight that with flat tariffs and centralized digital billing the billing disputes for domestic usage are rare and whatever cases there are the same are addressed well within the timelines of 4 weeks, most within one week also. 3. However, the timeline of 4 weeks was required to address the cases that are not purely internal computational errors correctable by an automated system, a significant number of billing disputes involve third-party billing chains such as international roaming settlement with foreign operators, payment-gateway and aggregator reconciliation, and cross-verification with partner networks, all of which have settlement cycles that an Indian operator does not unilaterally control. 4. A uniform one-week mandate for every category of billing dispute risks forcing premature closure of complex cases before the underlying facts (e.g., a disputed roaming charge pending confirmation from a foreign network) are actually available, which produces incorrect resolutions rather than fast ones and ultimately harms the same consumers this provision intends to protect. RJIL reiterates that the existing four-week period be retained, with any future reduction supported by an evidence-based impact assessment and safeguards for complex/third-party cases, better serves consumer interests than a uniform reduction applied without regard to dispute complexity.
8	Para 9(a)/(b), 10, 11, 12- Financial disincentives (scale,	This is where the schadenfreude comes to forefront as some stakeholders want higher	1. RJIL reiterates that financial disincentives are not legally tenable in a forbearance-based regime and are opposed across all Regulations and submits that customer churn is the appropriate market-discipline mechanism.

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	redirection to consumers)	Financial Disincentives and want to hurt the TSPs revenues, while others demand that some of FD proceeds should be redirected to consumer compensation or consumer protection infrastructure rather than only to the government's head of account.	2. RJIL reiterates that financial disincentive, in their current and any expanded form, should not be introduced across the QoS Regulations, and that consumer welfare is more directly served by transparent disclosure and competitive churn than by punitive fines redirected through a new administrative mechanism. 3. We submit that following fundamental questions are not addressed by either TRAI under its draft Regulations nor by the stakeholders treating this as an opportunity to hurt TSPs viz. - a What is the legal basis for TRAI proposing Financial Disincentives? Whether the existing FDs are legally tenable? - b Have the FDs, which are proposed almost recklessly with higher and higher caps and limits at every possible instant, improved compliance or improved Quality of Experience? - c Does the concept of FDs align with the TRAI's successful approach of forbearance and light touch regulation-based approach, which helped deliver the connectivity to billions at lowest tariffs in the world? 4. We believe the answer to all three questions is NO. The FDs are neither legally tenable nor have benefited the consumers in any significant manner. 5. Only achievement of rampant FD centricity of last few years is that this has put a cost on compliance i.e. a TSP can logically take a decision on whether or comply or just pay the FD and be done with. 6. We believe much better results can be achieved by approaching the policies of light touch and consensus-based co-regulation and Forbearance. We also interact with a massive number of consumers on daily basis and we believe that their focus is on addressing their

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			connectivity requirements at lowest costs and that should be respected and the whole eco-system should work together to address the same. 7. The Schadenfreude has never benefitted, and the TRAI and the consumer organizations should understand that the cost of FDs will also be eventually borne by the same consumers, in whose purported interest these are proposed to protect.
9	Para 8(a) / Reg 15(1)(e)-Quality of Experience Score (QoES)	Some stakeholders have supported the QoES and have also sought subset scores as well.	1. RJIL submit that the Authority should not mandate QoES publication without first sharing full methodology (data sources, weighting, validation) through a separate consultation; Further we believe that a composite score risks masking specific deficiencies. 2. It is crucial to point out here that a measure that is supposed to increase the transparency for consumers is being introduced without any transparency or discussion around the data sources, weighting methodology, normalization approach or validation process. 3. We request TRAI to carry out a consultation for the QoES before including the same in Regulations. We submit that whether a single composite figure or two or three sub-scores are published, both are outputs of the same as-yet-undisclosed and unconsulted methodology; thus, it is imperative that TRAI first consults on the full QoES methodology through a dedicated consultation, with independent validation and correction safeguards, before any publication (composite or component wise) is adopted.