



राष्ट्रीय समुद्देशीय विकास संस्थान Rastriya Samuddeshiya Vikas Sansthan (ISO 9001: 2018 CERTIFIED ORGANISATION)

State Office : Nagina Clinic, Rawali Mahdood, Post Bahadrabad, District- Haridwar, Pin Code-249402 (U.K.) India

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Date: - 25-08-2026

To

The Advisor (QoS-I)
Telecom Regulatory Authority of India (TRAI)
World Trade Center, Tower-F, Nauroji Nagar,
New Delhi - 110029
Email: adv-qos1@traigov.in

Subject: Suggestions on the Draft Amendments to the Standards of Quality of Service of Access and Broadband Service Regulations, 2024 – Recommendations in the Interest of Consumers

Respected Sir

I am pleased to submit the following suggestions on the Consultation Paper dated 5th August 2026 regarding the proposed amendments to *The Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024*.

The proposed amendments are an important step towards improving transparency, accountability and quality of telecom services. However, from the perspective of consumer protection and consumer interest, some additional provisions may kindly be considered so that the benefits of the regulations reach consumers in a more effective and measurable manner.

1. Coverage Maps Should Reflect Actual Consumer Experience

The proposed requirement for technology-wise coverage maps and graded categories such as **Excellent, Good, Fair and No Coverage** is welcome. The Consultation Paper itself recognizes that merely showing an area as “covered” may not adequately represent the actual quality experienced by consumers.

It is therefore suggested that coverage maps should also provide, wherever technically feasible:

- Expected download and upload speed;
- Latency information;
- Call quality/reliability indicators;
- Indoor and outdoor coverage separately;
- Technology-wise information for 4G and 5G; and
- The date and source of the latest measurement.

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

2. Coverage Maps Should Be Independently Verified

Service providers should not be the sole source for determining the accuracy of their own coverage maps. TRAI should continue independent drive tests and use consumer/crowdsourced data for verification.

The proposed framework already provides for independent validation through drive tests and TRAI Apps.

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It is suggested that the results of such independent validation should be published in a simple consumer-friendly format, preferably operator-wise and location-wise.

3. Stronger Consumer Feedback and Complaint Mechanism

Consumers should have an easy and accessible mechanism to report:

- Incorrect coverage;
- Poor call quality;
- Low data speed;
- Frequent call drops;
- Network outages; and
- Persistent service degradation.

The proposed framework already provides for a feedback facility on coverage maps.

It is further suggested that every consumer complaint should receive a **unique complaint/ticket number**, expected resolution time and status-tracking facility. During network-wide or localized disruptions, consumers should not be prevented from registering complaints; the proposed framework itself provides for complaint registration or automatic generation of fault tickets in such circumstances.

4. Automatic Compensation for Prolonged Network Outages

The proposed rebate mechanism for significant outages exceeding 24 hours is a positive consumer-protection measure.

However, consumers should not be required to separately request the rebate.

It is suggested that compensation should be **automatic**, with the amount or extended validity clearly communicated to the affected subscriber through SMS/app/email. The compensation should be reflected in the next bill for post-paid customers and automatically added to the validity of prepaid plans.

5. Compensation Should Also Apply to Material Service Degradation

The proposed definition recognizes material degradation where download or upload speed falls by 20% or more compared with the declared typical speed.

For consumer protection, TRAI may consider introducing a reasonable compensation mechanism where substantial degradation continues for a specified period, even if there is no complete network outage.

Consumers pay for a service plan based not only on connectivity but also on the promised quality and speed. Therefore, prolonged and substantial degradation should have an appropriate consumer remedy.

6. Greater Transparency Regarding Advertised Internet Speed

The proposed framework requires service providers to maintain their declared typical download and upload speeds and to notify affected customers if measured speeds are lower.

It is suggested that service providers should clearly display:



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Advertised Speed | Typical Speed | Actual Measured Speed | Measurement Period

This information should be available on the website/app in simple language so that an ordinary consumer can easily understand whether the service being delivered corresponds to the plan purchased.

7. Consumer-Friendly Quality of Experience (QoE) Score

The proposed introduction of a **Quality of Experience Score (QoES)** is a welcome initiative because it can combine network performance, consumer service and consumer perception.

It is suggested that the QoES should be published operator-wise in a simple rating format, along with the major parameters used for calculating the score.

The score should include, wherever feasible:

- Network availability;
- Data speed;
- Call quality;
- Call drops;
- Complaint resolution;
- Billing complaint resolution;
- Network outage performance; and
- Consumer satisfaction.

This would help consumers compare service providers on the basis of actual service quality rather than advertisements alone.

8. Special Protection for Rural and Underserved Areas

Consumer protection should also address the specific difficulties faced by consumers in rural and remote areas.

TRAI may consider separately monitoring QoS and coverage performance in rural areas and identifying locations where consumers repeatedly experience poor service. Persistent deficiencies should trigger corrective action and periodic monitoring.

9. Easy-to-Understand Information for Consumers

All coverage maps, QoS results, QoE scores and consumer-rights information should be presented in a simple and understandable manner.

Technical information such as dBm, PRB utilisation, percentile speeds and other technical parameters may be retained for regulatory purposes, but a simplified consumer view should also be provided.

This is particularly important because the proposed framework itself emphasizes user-friendly access and navigation for consumers.



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10. Public Disclosure of Non-Compliance

Where a service provider repeatedly fails to meet prescribed QoS benchmarks, consumers should be clearly informed.

TRAI may consider publishing:

- The relevant QoS parameter;
- The service provider concerned;
- The period of non-compliance;
- The affected service area; and
- Corrective action taken.

Such disclosure would improve transparency and encourage service providers to improve their performance.

Conclusion

The proposed amendments represent a significant opportunity to strengthen consumer protection in the telecom sector. The emphasis on accurate coverage maps, independent validation, consumer feedback, network outage reporting, compensation and Quality of Experience is highly beneficial.

I respectfully request TRAI to consider the above suggestions while finalising the amendments, with the objective that telecom consumers receive **transparent information, reliable service, fair compensation and an effective grievance-redressal mechanism.**

A consumer should be able to easily understand **what service is being offered, what service is actually being delivered, and what remedy is available when the promised quality is not received.**

I hope these suggestions will be considered in the larger public and consumer interest.

Yours faithfully,

(Poonam Sharma)
Designation- President