

Subject: Comments on Draft Amendments to the Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024

Date:01/09/2026.

To

The Advisor (QoS-I)
Telecom Regulatory Authority of India (TRAI)
Email: adv-qos1@traigov.in

Respected Sir/Madam,

I am submitting the following comments as an individual telecom subscriber in response to the consultation on the draft amendments to the Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024. TRAI has proposed several measures to improve consumer experience, transparency, and accountability of service providers, and I wish to bring certain issues affecting millions of mobile subscribers, particularly senior citizens and economically weaker sections of society.

1. Mobile Data is Now an Essential Service

A few years ago, loss of voice connectivity was considered a major inconvenience. Today, loss of mobile internet connectivity can have far more serious consequences.

A citizen may be unable to:

- Make UPI payments at shops and establishments.
- Access banking services.
- Receive OTPs for financial transactions.
- Book tickets and travel services.
- Access government welfare schemes and public service platforms.
- Communicate during emergencies.

In the present digital economy, uninterrupted internet access is indispensable for day-to-day living. Therefore, transparency in data usage, fair validity conditions, and effective consumer protection for internet services should be recognized as important Quality of Service parameters.

2. Fair Validity and Utilisation of Data Packs

Consumers purchase data packs with the expectation that they will be able to utilize the data for which they have paid. However, many data packs expire solely because the validity period ends, even when a substantial portion of the purchased data remains unused. Unlike voice calling services, where benefits can generally be availed throughout the validity period, consumers often lose unused data despite having paid for it. I request TRAI to consider a consumer-friendly framework whereby:

- - A data pack should remain valid until the entire purchased data quota is consumed irrespective of the declared maximum validity period expires. There should not be any time dead lines to data users.
 - Recharge packs advertised as Day wise or month wise should not be there. It will remain valid for a full consumption whether it take one hour or one month. Service provide should not disconnect the data service.

This will ensure fairness and improve consumer confidence in telecom services.

3. Lack of Transparency particularly in Mobile Data Consumption.

In today's digital environment, mobile internet connectivity has become a necessity rather than a luxury. Essential services such as UPI payments, internet banking, government services, educational platforms, healthcare applications, and communication tools depend heavily on mobile data. However, many subscribers do not have sufficient visibility into how their data is being consumed. Senior citizens, rural users, economically weaker subscribers and students often find it difficult to understand why their data balance gets exhausted quickly. Telecom service providers generally provide only the remaining balance without offering clear and simple information on the applications or services responsible for data usage. I therefore request TRAI to consider mandating:

- Easy-to-understand data usage dashboards suitable for senior citizens and non-technical users.
- Real-time and transparent disclosure of data consumption.
- Simple daily or hourly usage summaries.
- User-friendly alerts indicating major data-consuming applications or services.

4. Special Protection for Senior Citizens and Low-Income Subscribers

Many senior citizens are not familiar with complex tariff structures, validity conditions, fair usage policies, and data consumption reports. Similarly, low-income subscribers carefully manage their spending on telecom services and may suffer disproportionately when data expires before it can be fully used. TRAI may therefore consider requiring service providers to clearly display:

- Total data purchased.
- Data consumed.
- Data remaining.
- Exact date and time of expiry.
- Any restrictions applicable to the pack.

Such disclosures should be presented in plain language and in a standardized format across all telecom operators.

5. Standardisation of Consumer Information

There are mis-leading package information. To improve transparency and facilitate informed decision-making, TRAI may consider prescribing a common format for displaying recharge plans and data packs across all telecom operators. The information displayed should prominently include.

Instead of purchasing the fixed rate packages, let the option be available for the consumer to pay what ever amount they want to pay and the service provider shall activate either calling facility or data facility or both what ever the consumer chooses. There should not be any fixed time frame packages.

Conclusion

As India increasingly relies on digital payments, online banking, e-governance platforms, and internet-based services, mobile data connectivity should be treated as an essential service. Consumers deserve clear information regarding data usage and fair opportunities to utilize the benefits for which they have paid.

Flexible Consumer-Defined Recharge Option : At present, subscribers are compelled to choose from predefined recharge packs determined by service providers. I request TRAI to consider directing telecom operators to offer a flexible recharge option where consumers may decide the amount they wish to spend and select whether the recharge should be used for voice services, data services, or both. Similar to a consumer

deciding how much fuel to purchase at a fuel station, telecom subscribers should have the freedom to purchase communication services according to their actual requirements rather than being restricted to fixed packages. Such flexibility would promote affordability, reduce wastage of unused benefits, and support senior citizens, low-income users, and consumers with limited communication needs.

I therefore request TRAI to examine these issues and consider incorporating suitable provisions in the final regulations to strengthen consumer protection, transparency, and fairness in telecom services.

Yours faithfully,

Venkat K. Vaishnav

Hyderabad.