



April 27, 2026
Chennai

Sub: Comments on the Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026

General Comments

1. Ensuring Consumer-Centric Implementation

The success of the proposed amendment will depend on how effectively telecom service providers implement the requirement to offer Voice and SMS-only tariff plans across all validity periods. From a consumer perspective, the regulatory framework should ensure that:

- Consumers are provided with genuine and meaningful choices across different validity options
- Voice and SMS-only plans are made available without unnecessary restrictions or conditions
- Pricing remains fair, reasonable, and proportionate to the removal of data services
- Consumers are not indirectly compelled to purchase bundled plans containing services they do not require

The Authority may consider issuing clear operational guidelines to ensure consistent implementation across all telecom service providers.

2. Transparency and Visibility of Tariff Plans

While the draft regulation requires service providers to publish and make available Voice and SMS-only plans across customer touchpoints, it is essential to ensure that such plans are prominently displayed and easily accessible to consumers. There is a risk that service providers may technically comply with the regulation while limiting the visibility of these plans in practice.

Therefore, the regulatory framework should ensure that:

- Voice and SMS-only plans are prominently displayed at retail outlets and points of sale
- Tariff plans are clearly listed on official websites and mobile applications
- Consumers are able to easily identify and compare available options
- Tariff information is communicated in simple and understandable language

3. Protecting Low-Income and Vulnerable Consumers

The proposed amendment is particularly relevant for:

- Low-income consumers
- Rural consumers
- Elderly persons
- Feature phone users
- Consumers with limited digital literacy

These consumer groups often require smaller recharge amounts and shorter validity periods to manage their communication expenses.

The regulatory framework should therefore ensure that:

- Short-duration validity options are made available and affordable
- Tariff plans remain accessible through both digital and non-digital channels
- Retail outlets and customer care centres provide assistance to consumers in selecting appropriate plans

Ensuring affordability and accessibility for vulnerable consumers is essential to achieving the consumer protection objectives of the regulation.

4. Clarity in Pricing Principles

The draft regulation requires that Voice and SMS-only plans be priced with a reduction that is "largely proportional" to the removal of data services. While this principle is appropriate, the absence of a clear definition may lead to inconsistent pricing practices across telecom service providers.

To ensure fairness and transparency, the Authority may consider:

- Defining clear pricing principles or benchmarks
- Establishing guidelines for calculating proportional tariff reductions
- Requiring service providers to disclose the basis for tariff pricing

5. Strengthening Monitoring and Enforcement Mechanisms

Effective implementation of consumer protection regulations requires strong monitoring and enforcement mechanisms. From a consumer protection perspective, the Authority may consider introducing:

- Periodic compliance reporting requirements for telecom service providers
- Consumer complaint tracking related to tariff availability and pricing
- Random audits of retail outlets and customer touchpoints
- Penalty provisions for non-compliance with regulatory requirements

Strong enforcement mechanisms will help ensure that the intended consumer benefits are realised in practice.

6. Promoting Consumer Awareness and Informed Choice

Consumer awareness is a critical component of effective consumer protection. Even when affordable plans are available, consumers may remain unaware of them without proactive communication from service providers. The regulatory framework should therefore encourage:

- SMS notifications informing consumers about available Voice and SMS-only plans
- Public awareness campaigns on affordable telecom options

- Display of tariff plans in local languages
- Consumer-friendly communication materials at retail outlets

Improving consumer awareness will enhance utilisation of affordable tariff options and strengthen consumer empowerment.

Detailed Clause-wise Comments

Sl. No.	Existing / Proposed Provision	Comments
1	Regulation 4 – Requirement to offer Voice and SMS-only Special Tariff Vouchers corresponding to bundled plans	The proposed provision is a positive step towards improving consumer choice and affordability. However, the Authority should ensure that these plans are genuinely available across all customer touchpoints, including rural and semi-urban areas. Service providers should not restrict availability to digital channels alone.
2	Requirement for proportional reduction in tariff	The provision requiring proportional tariff reduction is appropriate and most welcome; however, the term 'largely proportional' requires clearer definition. The Authority may consider issuing pricing guidelines or benchmarks to ensure consistency and prevent arbitrary pricing practices.
3	Publication and availability of tariff plans	The regulation mandates publication of tariff plans, which again is a positive suggestion. However, additional clarity is required to ensure prominent display and easy accessibility. Tariff plans should be clearly displayed at retail outlets, customer care centres, websites, and mobile applications in simple language.

4	Consumer choice and prevention of forced bundled plans	The amendment appropriately addresses the issue of forced bundling of services. However, monitoring mechanisms should be established to ensure that service providers do not indirectly compel consumers to purchase bundled plans through pricing or promotional practices.
5	Accessibility for vulnerable consumers	The regulation should explicitly recognise the needs of vulnerable consumers, including elderly persons, rural consumers, and low-income users. Service providers should ensure availability of short-duration validity options and affordable recharge amounts, having them in mind.
6	Consumer awareness and communication	The effectiveness of the regulation will depend on consumer awareness. Service providers should be required to proactively inform consumers about available Voice and SMS-only plans through SMS notifications, customer care communication, and retail outreach.
7	Monitoring and enforcement	The draft regulation does not explicitly specify compliance monitoring or enforcement provisions. The Authority may consider introducing periodic compliance reporting and penalties for non-compliance to ensure effective implementation.
8	Review after implementation	The provision to review the regulation after six months is appropriate. The review process should include consumer feedback, analysis of tariff availability, pricing trends, and accessibility across regions.