GENERAL MANAGER TELECOM v. M. KRISHNAN AND ANR. – HAS THE SUPREME COURT ERRED?

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Abstract

There is a paradigm shift in the role of judiciary from consumer protection to facilitator of consumer woes. A critical analysis of the judgment which adds to consumer woes instead of abating it in respect of the telecommunication sector. Most consumer forum have been dismissing telecom complaints since September 1, 2009, by mechanically referring to the Supreme Court ruling in *General Manager, Telecom v. M Krishnan* that says disputes must be resolved through arbitration under the Indian Telegraph Act. This is not correct. There is no flaw in the existing laws so far as the consumers are concerned and therefore there is no necessity either to pressurize the government or other ways demand for an amendment of the Consumer Protection Act. The Law is well settled that even in cases where there is an arbitration clause either in the Act or in the contract, the Consumer Forum have jurisdiction on the telecom consumer cases.

Keywords - Consumer Protection, Telecom, Disputes, Arbitration.

Introduction

Consumer sovereignty has been prevalent through the consumer control over the market and in the events of default recourse to corrective and preventive mechanism for curbing of anti-consumer policies in form of effective and quick legal remedies under Consumer Act, 1986 was available till now.

The prevalent scenario has been altered by a Supreme Court judgment in September 2009, in the case of *General Manager v. T Krishnan and Ors.*[1] , whereby the remedy available to the telecomm consumers was barred under the Consumer Act,1986 and a direction was issued to take recourse to the special remedy already in existence under the Indian Telegraph Act,1885.

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1 2009 INDLAW SC 1082.

Resulting there from consumer could not take recourse to consumer forums in its vicinity in relation to telephone billing disputes rather has to file a complaint under Section 7(b) of the Indian Telegraph Act, 1885 proceeding with the appointment of arbitrator.

"A worker's paradise is a consumer's hell" has been aptly observed and said by Esther Dyson. The lengthy and tedious procedure of appointment of arbitrator by the Central Government and barring of the Consumer court's jurisdiction shall be only comforting the Telecomm companies but a sore to the consumer woes.

The judgment apart from being criticized is also facing wrath of the consumers against their judicial protector the apex court for rendering them such lengthy and complicated remedy against a simple and easy process.

Dispute Settlement Forums & Telecomm Regulatory Bodies: A Brief Overview

Telecomm Dispute Settlement Appellate Tribunal (TDSAT)

Until January 2000, TRAI had adjudicatory powers also to settle disputes "among Service Providers" or "between a Service Providers" and "a group of consumers" on matters relating to technical compatibility, interconnection, and revenue sharing arrangement between service providers and quality of telecommunication services and interests of consumers.

The TRAI Act, 1997 was amended in January 2000 and Telecom Disputes Settlement and Appellate Tribunal (TDSAT / Tribunal) were established with both original and appellate jurisdictions. This specialized independent Tribunal was created to exclusively adjudicate upon disputes in the Telecommunication Sector, including disputes between the licensor and the licensee(s).

Civil Courts' jurisdiction is barred and has been recognized in the Supreme Court (Majority Judgment):

> "… We have no hesitation in coming to the conclusion that the power of Appellate Tribunal is quite wide, as has been indicated in the statute itself and the decisions of this Court dealing with the power of a Court, exercising appellate power or original power, will have no application for limiting the jurisdiction of the appellate tribunal under the Act."

The Tribunal possesses jurisdiction on consumer disputes only when such dispute is between a service provider and a group of consumers. An individual complainant cannot approach the Tribunal for adjudication / redressal of his grievance.

MRTP Commission

Under the TRAI Act, 1997, the matters relating to the monopolistic trade practice, restrictive trade practice and unfair trade practice are subject matter of the jurisdiction of the Monopolies and Restrictive Trade Practices Commission. The matters of which are dealt now under the Competition Act, 2002 and thus dealt by Competition Commission of India.

Consumer Forums

The Tribunal possesses jurisdiction on consumer disputes only when such dispute is between a service provider and a group of consumers. An individual complainant cannot approach the Tribunal for adjudication/redressal of his grievance. For redressal of individual consumer complaint, the consumer had to approach the redressal authorities under the Consumer Protection Act, 1986 until the judgment of Supreme Court.

But these current redressal forums have mostly been unable to address the problems that the telecom users seem to suffer. In an online survey that was conducted by the author on a renowned social networking site (Facebook), majority of telecom users were found to be dissatisfied by the dispute solving mechanism. The author tried to find out whether the consumers were satisfied with the mechanism or not and out of the 63 voters, the majority, that is, 25 of the survey takers responded with-too long a process to call and register. 8 of the takers responded saying that the complaints go unheard. 7 of them voted for naive response and it being a time consuming exercise, wherein, only 23 of them were satisfied with the dispute mechanism. The number of satisfied customers evidently outweighs the number of dissatisfied customers. It is quite apparent that such proposed redressal system renders the consumer community helpless and major flaws in the redressal system makes it inefficient.

The Recent Supreme Court judgment: *General Manager v. M. Krishnan & Anr.*

Facts: The dispute commenced on 13/9/2001, when Mr. M. Krishnan's telephone connection no. 2740008 in Calicut, Kerala was disconnected by BSNL due to non-payment of dues. Aggrieved by this rather drastic action Mr. Krishnan complained at the Consumer Dispute Resolution Forum in Calicut which decided in his favour ordering BSNL to restore his connection and to pay a compensation of Rs. 5000 (excluding interest) to the complainant. Against the orders of the said consumer forum, BSNL filed a petition in the Hon'ble High Court of Kerala challenging that the consumer forum has no jurisdiction to entertain the petition of the consumer regarding a telegraph dispute. The single judge of the Hon'ble High Court dismissed the petition on the ground that the BSNL should have filed its appeal before the State Dispute Resolution Forum. BSNL appealed against this to a larger bench of the High Court but the case was dismissed there as well. Against this judgment dated 14/2/2003, BSNL preferred SLP under Article 136 of the Constitution where the special leave was granted and the Hon'ble Supreme Court quashed all the earlier orders to decide in BSNL's favour. The Hon'ble Supreme Court observed that:

> "In our opinion, there is a special remedy provided in Section 7-B of the Indian Telegraph Act regarding disputes in respect of telephone bills, then the remedy under the Consumer Protection Act is by implication barred".

The Supreme Court also took cognizance of Rule 413 and Rule 443 of the Telegraph rules which provide that all services relating to telephone are subject to Telegraph Rules and a telephone connection can be disconnected by the Telegraph authority for default of payment. Relying on the aforesaid provisions of law, the Hon'ble Supreme Court observed that it is well settled law that the special law (in this case the Indian Telegraph Act) overrides the general law (in this case the Consumer Protection Act) and held that the Kerala High Court was not correct in its approach.

The net result of the Hon'ble Supreme Court judgment is that the subscriber/consumer of telecom service can only go for resolution of his grievances under Section 7B of the Telegraph Act which provides that all such disputes are to be decided by an arbitrator appointed by the Central Government.

By the simple perusal of Section 7(b) given below, it is understood that the act in question implies that where there is a dispute in relation to any telephone line or apparatus between the telephone authority and the person for whom such line or apparatus has been set up, such a dispute will have to settled by statutory arbitration and the ordinary courts will not have any jurisdiction.

Section 7(b) of the Indian Telegraph Act states that,

"(1) Except as otherwise expressly provided in this Act, if any dispute concerning any telegraph line, appliance or apparatus arises between the telegraph authority and the person or whose benefit the line, appliance or apparatus is, or has been provided, the dispute shall be determined by arbitration and shall, for the purpose of such determination, be referred to an arbitrator appointed by the Central Government either specifically for the determination of that dispute or generally for the determination of disputes under this Section.
(2) The award of the arbitrator appointed under sub-s. (1) shall be conclusive between the parties to the dispute and shall not be questioned in any Court."

Also in support of the judgment it is viewed that it is well settled that the special law overrides the general law. The SC in the said judgment referred and concurred to earlier judgment of the apex court with regards to special law overriding the general law that the National Commission has no jurisdiction to adjudicate upon claims for compensation arising out of motor vehicles accidents. We agree with the view taken in the aforesaid judgment.

Madhya Pradesh State Consumer Redressal Commission in one the appeal held, relying on the apex court M. Krishnan case judgment also supported the same view and upheld it. The relevant portion of the said judgment reads as under:-

> "The aforesaid section is practically encompasses the entire consumer dispute. It was submitted in other appeals that the said section 7B clearly provides that except as otherwise expressly provided in this Act, if any dispute concerning any telegraph line, appliance or apparatus arises between the telegraph authority and the person shall be determined by the arbitrator. In this view of the matter we cannot proceed with the appeal.

> In the result, the appeal is allowed and the order passed by the District Forum is set aside. However, we grant liberty to the complainant to pursue the matter under the said Telegraph Act before the appropriate forum."

The Act of 1885 is evidently an old law when not many people had access to even basic telephone services in contrast to the present scenario where the connection is owned by more than half the population of India.

The Apex Court Judgment and the fallacies hereunder:

The judgment has fallacies regarding the following interpretation of facts:

- The judgment is being criticized on the fact that Section 7B refers to dispute between a "person" and "telegraph authority". Telecom companies cannot be called "telegraph authority" by any stretch of imagination. Section 3(6) of the Telegraph Act defines Telegraph Authority as "the Director General of Posts and Telegraphs and includes any officer empowered by him to perform all or any of the functions of the Telegraph authority". Excluding the private and public service providers from the purview of Telegraph Authority thereby.
  But by the construction of Section 19(b) of Indian Telegraph Act, 1885 such companies have been empowered with the functions and powers of Telegraph Authority and thus rendering the application of Telegraph Act to deal with consumer disputes in relation to telecomm activities.
- Section 3 of Consumer Protection Act clearly says it is a remedy in addition to any other remedy available to the consumer. Section 3 of the Consumer Protection Act which is a later act than the Telegraph Act, clearly provides that the provisions of the said act are in addition to and not in derogation of the provisions of any other law for the time being in force and therefore the remedies provided to a consumer by the said Act are in addition to other remedies provided under other law or laws, as the case may be. This should mean that the Consumer Protection Act acts simultaneously with other legislations granting remedies to the consumers.
- TRAI Act clearly mentions that TRAI will hear complaints only from "group" of customers, not individual complaint. Legislative intent was to keep individual complaints with consumer forums. Proviso (B) of clause (a) of Section 14 of the TRAI Act, 1997 excludes from the purview of the Telecom

Disputes Settlement & Appellate Tribunal (TDSAT) a dispute relating to the complaint of an individual consumer maintainable before a consumer forum or a consumer commission. Section 14 of the TRAI Act expressly empowers the TDSAT to adjudicate any dispute between a service provider and a group of consumers. This is clearly indicative of a legislative intent of the Parliament that the complaints of individual consumers in respect of telecom services are maintainable before the consumer forums. The TRAI does not usually examine individual consumer disputes. It looks at issues that affect all consumers – for instance, it would not usually look into matters of an individual being overcharged by a particular service provider, but it would be concerned about whether a service provider has in place the required systems for consumers to choose not to receive marketing calls. TDSAT hears appeals from cases decided by TRAI and therefore looks at similar cases as TRAI – those with some "group" interest.

- The main lacunae in the judgment lay in the appointment of Arbitrator by the Central Government itself. Appointing arbitrators for the high-volume of telecom cases is not practical and feasible. Only the Central Government is authorized to appoint an arbitrator under the Telegraph Act. Considering the present multi-operator, multi-service scenario, coupled with intense competition and very high growth rate, it would not be practicable for the Central Government to appoint an arbitrator for each and every case. At the same time, the main objective of creating an additional cost effective legal remedy through the consumer forum as an alternative dispute resolution mechanism for resolving the disputes with the service providers will be defeated.

Apex Courts Decision Binding but not on itself

Article 141 says that the law declared by the Supreme Court shall be binding "on all courts" within the territory of India and Article 144 directs that all authorities civil and judicial, in the territory of India, shall act in aid of the Supreme Court.

Article 141 empowers the Supreme Court to 'declare' the law and not enact it. Hence, observations of the Supreme Court should not be read as statutory enactments. At the same time, this Article recognizes the role of the Supreme Court to alter the law in the course of its function to interpret a legislation so as to bring the law in harmony with social changes. In furtherance of dispensation of justice in consonance with the prevalent social

conditions as against the old conditions and the old laws should be amended accordingly.

The apex court in *Rupa Ashok Hurra v. Ashok Hurra*[2], observed as under:

> "41. At one time adherence to the principle of stare decisis was so rigidly followed in the courts governed by the English jurisprudence that departing from an earlier precedent was considered heresy. With the declaration of the practice statement by the House of Lords, the highest court in England was enabled to depart from a previous decision when it appeared right to do so. The next step forward by the highest court to do justice was to review its judgment inter panes to correct injustice. So far as this Court is concerned, we have already pointed out above that it has been conferred the power to review its own judgments under Article 137 of the Constitution. The role of the judiciary to merely interpret and declare the law was the concept of a bygone age. It is no more open to debate as it is fairly settled that the courts can so mould and lay down the law formulating principles and guidelines as to adapt and adjust to the changing conditions of the society, the ultimate objective being to dispense justice. In the recent years there is a discernible shift in the approach of the final courts in favor of rendering justice on the facts presented before them, without abrogating but bypassing the principle of finality of the judgment."

In *Union of India v. Raghubir Singh*[3], Pathak, C.J. speaking for the Constitution Bench aptly observed:

> "43. But like all principles evolved by man for the regulation of the social order, the doctrine of binding precedent is circumscribed in its governance by perceptible limitations, limitations arising by reference to the need for re-adjustment in a changing society, a re-adjustment of legal norms demanded by a changed social context."

"The concern of this Court for rendering justice in a cause is not less important than the principle of finality of its judgment. We are faced with competing principles - ensuring certainty and finality of a judgment of the Court of last resort and dispensing justice on reconsideration of a judgment on the ground that it is

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[2] AIR 2002 SC 1771.

[3] 1989 AIR 1933.

vitiated being in violation of the principle of natural justice or apprehension of bias due to a Judge who participated in decision making process not disclosing his links with a party to the case, or abuse of the process of the court. Such a judgment, far from ensuring finality, will always remain under the cloud of uncertainty. Almighty alone is the dispenser of absolute justice - a concept which is not disputed but by a few. We are of the view that though Judges of the highest Court do their best, subject of course to the limitation of human fallibility, yet situations may arise, in the rarest of the rare cases, which would require reconsideration of a final judgment to set right miscarriage of justice complained of. In such case it would not only be proper but also obligatory both legally and morally to rectify the error. After giving our anxious consideration to the question we are persuaded to hold that the duty to do justice in these rarest of rare cases shall have to prevail over the policy of certainty of judgment as though it is essentially in public interest that a final judgment of the final court in the country should not be open to challenge yet there may be circumstances, as mentioned above, wherein declining to reconsider the judgment would be oppressive to judicial conscience and cause perpetuation of irremediable injustice."

Thus the remedy of curative petition should be relied upon and the Supreme Court should exercise its powers under Article 142 whereby it can pass an order or decree in prolongation of dispensation of justice. The Department of Telecommunications or Telecom Regulatory Authority of India should approach the court for review of its judgment, also since the judgment affects the cause of millions of telecom consumers public interest litigation can be filed for the same.

A general conflict that prevails in law simultaneous to this remedy is that curative petitions in the Supreme Court is to strike a balance between the concerns of the Supreme Court for rendering justice in a cause with the principle of finality of its judgment. The Supreme Court has often observed that the former is not less important than the latter.

The Supreme Court has rightly observed it in the case in *Rupa Ashok Hurra v. Ashok Hurra*[4] following:

[4] *Supra* note 3, at 10.

- The upshot of the discussion in our view is that this Court, to prevent abuse of its process and to cure a gross miscarriage of justice, may re-consider its judgments in exercise of its inherent power.
- The next step is to specify the requirements to entertain such a curative petition under the inherent power of this Court so that floodgates are not opened for filing a second review petition as a matter of course in the guise of a curative petition under inherent power. It is common ground that except when very strong reasons exist, the Court should not entertain an application seeking reconsideration of an order of this Court which has become final on dismissal of a review petition. It is neither advisable nor possible to enumerate all the grounds on which such a petition may be entertained.
- Nevertheless, we think that a petitioner is entitled to relief ex debito justitiae if he establishes (1) violation of principles of natural justice in that he was not a party to the list but the judgment adversely affected his interests or, if he was a party to the list, he was not served with notice of the proceedings and the matter proceeded as if he had notice and (2) where in the proceedings a learned Judge failed to disclose his connection with the subject-matter or the parties giving scope for an apprehension of bias and the judgment adversely affects the petitioner.

In furtherance of reviewing its own decision there is yet another remark made by the Apex court itself in the following judgment.

The Apex Court referred to its own judgment in *S. Nagaraj v. State of Karnataka*,[5] wherein it was observed as under:
"Justice is a virtue which transcends all barriers. Neither the rules of procedure nor technicalities of law can stand in its way. The order of the Court should not be prejudicial to anyone. Rule of stare decisis is adhered for consistency but it is not as inflexible in administrative law as in public law. Even the law bends before justice. Entire concept of writ jurisdiction exercised by the higher courts is founded on equity and fairness. If the Court finds that the order was passed under a mistake and it would not have exercised the jurisdiction but for the erroneous assumption which in fact did not exist and its perpetration shall result in miscarriage of justice then it cannot on any principle be precluded from rectifying the error. Mistake is accepted as valid reason to recall an order.

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5 High Court of Karnataka, W.P.32753, 1996.

Review literally and even judicially means re-examination or reconsideration. Basic philosophy inherent in it is the universal acceptance of human fallibility. Yet in the realm of law the courts and even the statutes lean strongly in favour of finality of decision legally and properly made. Exceptions both statutorily and judicially have been carved out to correct accidental mistakes or miscarriage of justice. Even when there was no statutory provision and no rules were framed by the highest court indicating the circumstances in which it could rectify its order the courts culled out such power to avoid abuse of process or miscarriage of justice.

Rectification of an order thus stems from the fundamental principle that justice is above all. It is exercised to remove the error and not for disturbing finality."

Recent Trends

In a judgment dated 31 December 2009, SP Mahajan, president, consumer disputes redressal forum, central Mumbai district and SS Patil, member, ruled that complaints regarding telephone services can be filed before the consumer forum and need not be referred to arbitration.

"The order of the central Mumbai district forum comes as a major relief to telephone users all over the country and would help consumers to seek redress from consumer courts rather than be thrown to the mercy of arbitrators," said Achintya Mukherjee, honorary joint secretary, Bombay Telephone Users' Association.

The forum heard a case filed by the Consumer Welfare Association (CWA) against Bharti Airtel Ltd for disconnecting the phone of the complainant and compelling him to make payment for a disputed bill. The forum raised the point whether a telecom complaint was maintainable in the consumer courts in light of the Supreme Court's judgment in the case of the *General Manager (telecom) vs. M. Krishnan*. In this case, the court held that Section 7-B of the Indian Telegraph Act 1885 provides a special remedy for a dispute between a telegraph authority and the user by an arbitrator appointed by the Union government. As such, the consumer forum would have no jurisdiction on such a dispute. However, the forum concurred with the view of the complainant that the Indian Telegraph Act spoke of disputes between the 'telegraph authority' and subscribers.

Consumer advocacy groups (CAGs) all over the country have been agitated over the lack of clarity on the part of the Union government stand on whether consumer courts were barred from taking up telecom cases by the judgment of the Supreme Court. BTUA on behalf of the CAGs had sought the stand of the Telecom Regulatory Authority of India (TRAI), the consumer affairs department and the Union government on the matter. BTUA has been told that the opinions of the Attorney General of India and the ministry of justice have been sought. Telecom consumer cases include dropped calls, over-charging of customers, unwanted value-added charges and false calls. These cases involve mobile providers, internet service providers, broadband service providers, DTH operators, cable TV operators and landline service providers[6].

There is no flaw in the existing laws so far as the consumers are concerned and therefore there is no necessity either to pressurize the government or other ways demand for an amendment of the Consumer Protection Act. The Law is well settled that even in cases where there is an arbitration clause either in the Act or in the contract, the Consumer Fora have jurisdiction by virtue of section (3) of the Act as per the following judgments of the Apex Court:

1.Fair Air Engineers v. N.K.Modi, (1996) 6 SCC 385.
2.Skypark Couriers Ltd v. Tata Chemicals Ltd (2000) SCC 294.
3.Secretary, Thirumurugan Co-operative Agricultural Credit Society v. M.Lalitha(2004) I SCC 305.

The Judgement Nos.1 & 3 cited above are being relied on by the District Consumer Disputes Redressal Forum who hold the view that there is jurisdiction. The decision of the Apex Court in *"General Manager, Telecom v. M.Krishnan & Others"* relied on by Hon'ble Justice Katju in which a contrary view was taken has been over ruled by the Apex Court in the following judgments:

1. *Uttarkhand Power Corporation Ltd and another v. A.S.P Scaling Products Ltd* (2009) 9 SCC 701.
2. *Trans Mediterranean Airways v. Universal Exports and another* (2011) 10 SCC 366.

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[6] http://www.moneylife.in/article/telecom-users-can-now-approach-consumer-courts-directly/3300.html visited 16-2-2013.

3. *The National Seeds Corporation Ltd v. M.Madusudhanan Reddy* (2012) 2 SCC 506.

This apart, one latest decision of the Delhi High Court *J K Mittal v. Union of India & Ors*[7] rules that the Consumer forum does have jurisdiction to try mobile complaints.

In J. Subramaniam, Advocate, Chennai Vs. The Manager, M/s. Bharati AIRTEL Ltd., Chennai State Consumer Disputes Redressal Commission, 29th Day of November 2012 The Commission decision said the Consumer Protection Act would in fact apply to consumer complaints against telecom service providers because of the provisions of the TRAI Act, 1997, which had not been considered by the SC in Krishnan Case in 2009 decision.

Conclusion

Without exhausting the alternative remedies, the consumer should not approach the consumer fora. The statement though legally correct in view of the recent deprecated judgment of the Apex court where the lengthy and tedious remedy is given to a consumer who is already suffering the pangs of little time for himself when he is busy trying to make his both ends meet.
The words 'all courts in' Article 141 may include all subordinate courts, tribunals and forums but does not include the Supreme Court. In overruling its earlier decision, the Supreme Court should remember that while the decisions of other Courts are binding only upon the litigants, a decision of the Supreme Court is something more: it is declaratory for the nation. Accordingly, the Supreme Court is free to depart from its earlier decision in certain cases.

Where by virtue section 19 B of the Indian Telegraph Act, 1885 the Telecom License Holder enjoys the status of the Telegraph Authority but the lacunae of solving the complainants speedily still remains in the hands of Central Government who alone is entitled to appoint arbitrator in the same regard. Telecom Consumers Complaint Redressal Regulations, 2012 as has been set out by the Telecomm Regulatory Authority of India prescribes a tedious procedure with the already agitated consumer to return to the same provider complaint Centre which is a cause of his

[7] W.P.(C) 8285/2010 & C.M. No.21319/2010.

agony. It not only frustrates him more but where he is spending his hard earned money he shall be made to settle for less than he deserves as he would be discouraged in the mundane busy life to approach the complaint Centre , if unsatisfied the appellate body a higher body to redress his grievances which is but the same service provider. The consumer would also be rendered helpless in case the service providers lack to update him on the status of complaints themselves. By virtue of Section 6 of the regulation only the educated consumer would be able to review the status of their complaint as against the countless not so web friendly consumers who will have to bear the cost of time and expenditure to know the status of their complaints in the events of default.

This shall not only hamper the quick and speedy redressal of grievances but an additional burden on the government to appoint arbitrators for individual cases. Also Section 19 of the said regulation does not bar the application of any other law which stands in conflict with the decision of the Supreme Court and adds to the confusion. The Supreme Court can review its decision suo moto or by way of curative petitions by consumer organizations and PIL's by people and a larger Bench and uphold the High Court's Judgment and come to the rescue of the consumers. Apart from the review of the decision it must also be considered to amend the old Telegraph Act of 1885 in reference to the fact that event the Consumer Act, 1986 has been amended thrice since its existence with the changing trends of society to meet its needs and settle the chaos around the consumer complaints and telecomm sector.

Later a memo was issued by the Department of Telecommunications clarified that the District Forum would have jurisdiction over individual telecom complaints by consumers, and the 2009 judgment of Krishnan was sui generis and not applicable to every set of circumstances. The memo may be found here: http://www.dot.gov.in/sites/default/files/DOC040214-002_0.pdf. The overall effect of these is that telecom sector consumer complaints are within District Forum jurisdiction, without actually commenting on general law v. special law.

Annexure-I

Memo issued by Ministry of Communication & Information Technology, Department of Telecommunication regarding the jurisdiction of Consumer forums to adjudicate the consumer disputes[8].

No. 2-17/2013-Policy-I
Government of India
Ministry of Communications & IT
Department of Telecommunications
(Policy-I Section)

New Delhi dated the 4th February, 2014.

OFFICE MEMORANDUM

Subject: Jurisdiction of District Consumer Dispute Redressal Forum (District Forum) to adjudicate disputes between individual telecom consumers and telecom service providers-regarding.

The undersigned is directed to enclose the brief on view taken by Government of India on the above subject for wide publicity.

(Anand Agrawal)
Director (P&RB)
Tel. 23036032

Copy for information and necessary action to:

(i) Press Information Officer, Press Information Bureau for giving wide publicity to the above.
(ii) Director (IT), DoT for uploading the above on DoT web-site.

[8] Available at http://www.dot.gov.in/sites/default/files/DOC040214-002_0.pdf.