DSCI
PROMOTING DATA PROTECTION

Brief on

TRAI Consultation Draft Guidelines on Responsible Use of AI in Telecom



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1. Overview

DSCI notes the release of the draft guidelines on responsible use of AI in telecom networks and services by the Telecom Regulatory Authority of India (TRAI) on 30th October 2026, with comments due by 27th November 2026. The draft applies the Government's February 2026 India AI Governance Guidelines to telecom. The key highlight of this consultation paper is - any licensed or authorized telecom entity using AI would need a board-approved AI policy, an AI system inventory, pre-deployment testing, an incident database, a senior-led AI governance committee, and must report serious AI incidents to TRAI.

2. Background and objective

TRAI's concern of Artificial Intelligence (AI) capabilities spreading through telecom networks and services faster than the governance currently around it. AI can raise efficiency, but it brings new risks if firms skip due diligence before deployment or fail to supervise systems that learn on their own. The paper names three such risks:

(i) biases that creep in during training and use;

(ii) unintended behavior such as "model drift" (a model's performance degrading as real-world data shifts away from its training data), and

(iii) adversarial attacks (inputs crafted to fool a model). These could weaken the resilience of critical telecom infrastructure.

Telecom sector serves as core national infrastructure: it carries public e-services, commerce, critical information infrastructure, national security and emergency response. The stated objective is consistent, responsible implementation of the India AI Governance Guidelines in telecom, and more "clarity, predictability and accountability". Those national guidelines rest on seven "sutras": Trust is the Foundation, People First, Innovation over Restraint, Fairness & Equity, Accountability, Understandable by Design, and Safety, Resilience & Sustainability.

3. Key proposals explained

Who is covered. An "applicable authorized entity" is any entity holding a license under the Telegraph Act, 1885 or an authorization under the Telecommunications Act, 2023 to provide telecom services, or an authorization under the 2023 Act to establish, operate, maintain or expand telecom networks, and which uses or intends to use AI in networks, services, or both. There is no size threshold or exemption.

A. Board-approved internal AI policy. Each entity must write and implement an "Internal AI policy on telecom", approved by its board or equivalent governing body. It must cover at least:

- **Risk classification** of every AI system as high, medium or low risk, based on "materiality": its significance to networks or services, including financial, operational and consumer impact.
- **Approval before use** by a designated officer; approval may be delegated by risk tier.
- **Incident classification** into four levels: critical, high, moderate and low severity.
- **Incident handling**: record all incidents in a central database in a predefined format; mitigate under a standard operating procedure (SOP); investigate under a predefined mechanism; report critical and high-severity incidents to TRAI in a "prescribed format, manner and timeframe".
- **Human oversight** of all AI systems under a predefined mechanism.
- **Data governance**: data at every lifecycle stage handled lawfully and securely under data protection, privacy, confidentiality and cybersecurity law.
- **Consumer grievances**: AI-related harms reported by users resolved "within a reasonable timeframe".

The policy must be reviewed at least once each financial year and whenever needed. The policy and every amendment must be filed with TRAI "for record" within **seven working days** of taking effect.

B. Implementation duties. Entities must:

- Keep an up-to-date **inventory** of all active, inactive and decommissioned AI systems, with source, purpose and risk class. No system may be used unless listed.
- Do **due diligence** on third-party AI before acquiring it: supplier credibility, soundness and limits of the system, and training data quality.
- Run **validation, conformity assessment and impact assessment** before deploying any new or modified system. Conformity must cover accuracy, robustness, explainability, fairness, drift resilience and human oversight. For fairness, TEC standard 57050:2023 or an international equivalent "may be used". TEC is the Telecommunication Engineering Centre, the government's telecom standards body.
- **Re-assess risk category** at least once a financial year or after specific incidents.
- Obtain **AI disclosures from suppliers** of equipment or solutions with embedded AI.
- Put **enforceable clauses in supplier contracts** on compliance, audit and inspection rights, incident management, risk allocation and accountability, before deployment.
- Keep a **central incident database**, including testing events, using TEC standard 57090:2025 or an equivalent taxonomy; mitigate per SOP; investigate and share findings internally.
- Keep a **database of user-reported AI harms** and their resolution.
- Run **periodic AI training** for staff involved in oversight.

C. Governance committee. Each entity must set up an AI Governance and Safety Committee (AGSC), approved by the board, drawing on network operations, service delivery, IT, data, regulatory, consumer affairs and other functions. A senior executive, the AI Governance and Safety Officer (AGSO), heads it. The AGSC reviews AI performance and incident records at least yearly; the AGSO must ensure corrective action, including modifying or decommissioning systems.

D. Accountability and enforcement. The entity is accountable for outcomes of all AI it uses, whether built in-house, outsourced or mixed. Critical and high-severity incidents, including material malfunctions, recurring failures and mitigation steps, must be reported to TRAI; TRAI may use this for sector-wide learning, advisories and "other lawful regulatory purposes". Entities must keep records proving compliance and supply them on demand. The guidelines do not displace any other law, license condition or direction.

Definitions. Eleven terms are defined, including AI system (a machine-based system that infers outputs such as predictions or decisions from inputs), AI incident (a malfunction, unintended outcome or unpredictable behavior potentially causing harm or violating legal rights), risk, robustness, explainability, fairness and resilient AI system.

4. DSCI Call for Inputs

Deadline and submission. Written comments are due by **27.11.2026**. As **Data Security Council of India (DSCI),** we encourage every stakeholder to provide their detailed inputs, suggestions and comments that we as a leading technology industry body can further send to the regulatory body. Please wrote to us at **policy@dsci.in**

Source: **TRAI, Draft Guidelines on Responsible Use of AI in Telecommunication Networks and Provision of Telecommunication Services, 30.10.2026**.

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