

Central Consumer Protection Authority
Room No. 545, Krishi Bhawan, New Delhi - 110001

Case No: CCPA-2/29/2025-CCPA

In the matter of: Case against Amazon Seller Services Pvt. Ltd regarding violation of consumer rights, misleading advertisement and unfair trade practice.

CORAM:

Smt. Nidhi Khare, Chief Commissioner

Shri. Anupam Mishra, Commissioner

Appearance on behalf of Amazon Seller Services Pvt. Ltd:

Adv. Nitin Sharma, Manav Raghuvanshi, Richa Bakshi (Sr. Corporate Counsel),
Praneetha Shivaprakash

Date: 15.01.2026

ORDER

1. The Consumer Protection Act 2019 seeks to provide protection to the interests of consumers. Pursuant to the objective, under section 10 of the Consumer Protection Act, 2019 (hereinafter referred to as Act) the Central Consumer Protection Authority (hereinafter referred to as 'CCPA') has been established to regulate matters relating to misleading advertisement, unfair trade practice, violation of rights of consumers and enforce the rights of consumer as a class.
2. This is a case *suo moto* taken up by the CCPA on the basis of the sale of many walkie-talkies also known as Personal Mobile Radios (PMRs) on the e-commerce platform Amazon Seller Services Pvt. Ltd "Amazon" (hereinafter referred as 'opposite party') without necessary disclosures.
3. Taking cognizance of the listings, hostings, and advertisements of Walkie Talkie on the e-commerce platform Amazon, the CCPA, in exercise of the powers

conferred under Section 19 of the Consumer Protection Act, 2019 (hereinafter referred to as "the Act"), conducted a preliminary inquiry. During the inquiry, it was examined that the use, possession, and operation of walkie-talkies, also known as Personal Mobile Radios (PMRs), are regulated under the Indian Wireless Telegraphy Act, 1933. The regulatory framework governing such devices is administered by the Wireless Planning and Coordination (WPC) Wing under the Ministry of Communications. Further, the "Use of Low Power and Very Low Power Short Range Radio Frequency Devices (Exemption from Licensing Requirement) Rules, 2018" prescribe the conditions and technical requirements governing licensing exemptions and regulatory compliance for such devices.

4. It may be noted that Rule 3 read with Table V of the aforesaid Rules, issued vide Notification dated 18th October 2018 by the Ministry of Communications, provides that Personal Mobile Radios (PMRs) operating within the frequency range of 446.0–446.2 MHz are exempted from the requirement of obtaining a wireless operating licence, subject to fulfilment of prescribed technical parameters. However, all other wireless radio frequency devices, including PMRs operating outside the said frequency range, are mandatorily required to obtain Equipment Type Approval (ETA) from the Wireless Planning and Coordination (WPC) Wing to ensure compliance with applicable Radio Frequency (RF) regulations. As per Ministry of Communications O.M. dated 09.09.2024 issued with an objective to promote ease of Doing Business in the telecom sector specifies that *"These ETAs shall be granted for ensuring compliance with RF regulations. Therefore, ETA holders must obtain No Objection Certificate or other clearances (if applicable) from the Directorate General of Foreign Trade (DGFT) before importing the equipment. It is the sole responsibility of the ETA holders to ensure compliance with all import regulations and requirements stipulated by the DGFT"*.

The grant of ETA is intended to ensure that such devices operate only within the authorised frequency spectrum and conform to prescribed standards.

5. Considering the above statutory framework and the consumer rights enshrined under Section 2(9) of the Act, which include the right to be informed about the quality, standard, and genuineness of goods, the right to be protected against the marketing of goods hazardous to life and property, and the right to consumer awareness, it was

observed that walkie-talkies were being listed, hosted and advertised for sale on the e-commerce platform operated by Amazon without mandatory and clear disclosures regarding compliance with applicable wireless laws and regulations.

6. Further, it was observed that Amazon and the sellers hosted on its platform were not providing material information relating to the operating frequency range of the walkie-talkies. In the absence of such disclosures, consumers were unable to ascertain whether the devices fell within the license-exempt category or were required to obtain a wireless operating license or regulatory approval for lawful use.

7. The product listings and hostings of walkie-talkies available on the Amazon platform did not specify whether the devices required Equipment Type Approval (ETA) or any license from the competent authority for use in India. By omission of such crucial regulatory information, the listings and hostings appeared to mislead consumers into believing that the devices were legal for unrestricted use, irrespective of statutory requirements.

8. The CCPA, prima facie, observed that Amazon, by allowing the display and promotion of such product listings and hostings on its platform without ensuring disclosure of essential regulatory information, failed to exercise due diligence. Such conduct had the effect of attracting consumers to purchase the products while concealing material facts necessary for informed decision-making, thereby amounting to possible violations relating to misleading advertisements and unfair trade practices under the Consumer Protection Act, 2019.

9. It may also be noted that under the Consumer Protection (E-commerce) Rules, 2020, every e-commerce entity is required to ensure that material information relevant to goods offered for sale is prominently displayed and that sellers provide accurate, complete, and truthful product details at the pre-purchase stage. In the present case, Amazon and the sellers hosted on its platform appeared to have failed to comply with these statutory obligations, resulting in a violation of the Consumer Protection (E-commerce) Rules, 2020.

10. In light of the above facts and circumstances, and keeping in view the provisions of Sections 2(28), 2(47), and 21 of the Act, which prohibit misleading advertisements and unfair trade practices, the CCPA took cognizance of the matter.

The Authority also took note of Guidelines 4 and 12 of the Guidelines for Prevention of Misleading Advertisements and Endorsements for Misleading Advertisements, 2022, which mandate that advertisements must be truthful, not conceal material information, and be capable of substantiation. The impugned listings and advertisements hosted on the Amazon platform were found, prima facie, appears to be in violation of the aforesaid provisions.

11. Thereafter, the CCPA issued a Show Cause Notice dated 2nd May 2025 to the opposite party under the provisions of the Act for alleged violation of its provisions.

12. The detailed response submitted by the opposite party was received vide email dated 05 June 2025, along with an annexed Excel sheet containing supporting data, which stated the following:-

- i. Amazon acknowledged the existence of the statutory and regulatory framework governing the manufacture, import, and sale of walkie-talkies in India, including the requirement for obtaining Equipment Type Approval (ETA) under the *Use of Low Power and Very Low Power Short Range Radio Frequency Devices (Exemption from Licensing Requirement) Rules, 2018*. Amazon further took note of the requirement for obtaining import-related No Objection Certificates (NOCs) from the Directorate General of Foreign Trade (DGFT), as stipulated under the Office Memorandum dated 09.09.2024 issued by the Ministry of Communications.
- ii. The response specifically addressed two product listings that were identified in Annexure I of the Show Cause Notice, namely:
 - a. *Ele' Espirit for Kids – 16 Channel 2 Way Radio* (ASIN: B0F25G31WZ), sold by Elekart (Sandeep); and
 - b. *ELECRANGE 2 Way Portable Walkie Talkie* (ASIN: B0DWV41PJB), sold by Epicart Retail.
- iii. With respect to each of the aforesaid product listings, Amazon furnished the corresponding listing URLs and seller particulars, including the seller's name, address, email ID, and contact number. Amazon further admitted that the said listings did not contain disclosures relating to WPC/ETA certification or the operating frequency/bandwidth specifications of the devices.

- iv. Additionally, Amazon submitted an appendix, annexed with its response, disclosing sales-related data pertaining to the aforesaid listings. The appendix detailed, inter alia, the number of units sold during the period from January 2023 to May 2025, which was 2602 units sold, the names of the concerned sellers, and relevant order and invoice particulars.
- v. Amazon stated that, pursuant to the Notice, it had initiated measures in accordance with law to address the concerns raised regarding products listed without regulatory disclosures by suppressing the impugned listings that are brought to its attention.
- vi. Further stated that, amazon operates as an e-commerce marketplace at www.amazon.in where third-party buyers and sellers interact and transact. It does not manufacture, procure, list, price, offer for sale or sell any products on its marketplace, including wireless equipment such as the Impugned Products. These activities, including product listing, pricing, and regulatory compliance, are undertaken solely by third-party sellers. Amazon provides the marketplace platform to enable sellers to create product listings and determine the nature and type of products sold.
- vii. Amazon, while making the above submissions, reiterated its position as an intermediary within the meaning of the Information Technology Act, 2000. It contended that the primary responsibility for ensuring compliance with applicable laws, including disclosure of regulatory approvals, certifications, and licensing requirements, rests with the sellers listing products on its platform. Amazon further submitted that sellers are responsible for uploading accurate and complete product information on the platform.
- viii. Amazon stated that, it acts against non-compliant content upon receiving specific notice from regulatory authorities, as intermediaries cannot independently adjudicate complex regulatory compliance issues. Amazon also stated that, does not possess the regulatory expertise to proactively identify all potentially non-compliant wireless equipment listings on its marketplace. Section 79(1) of the IT Act provides safe harbor protection to intermediaries for third-party content, subject to compliance with due diligence obligations under Sections 79(2) and 79(3).

- ix. Amazon stated that it complies with the Information Technology (Guidelines for Intermediaries and Digital Media Ethics Code) Rules, 2021 and has adopted measures to exercise due care and diligence as mandated by law.
- x. Opposite party also expressed its intention to extend full cooperation to the Central Consumer Protection Authority.

13. Subsequent to the receipt of the response dated 05.06.2025 submitted by the opposite party, a prima facie verification of the e-commerce platform operated by the opposite party was undertaken in order to assess the veracity and completeness of the submissions made therein. Upon such verification, it was observed that three listings of walkie-talkie products continued to remain active and publicly accessible on the said platform.

- i. Notably, one of the continuing listings pertained to the product titled *"Ele' Espirit for Kids – 16 Channel 2 Way Radio"* (ASIN: B0F25G31WZ), being offered for sale by the seller Elekart. It is pertinent to note that the said product listing was specifically referred to and examined in the response submitted by the opposite party to the Show Cause Notice, wherein the opposite party had categorically acknowledged the absence of requisite WPC/Equipment Type Approval (ETA) certification and the non-disclosure of mandatory technical parameters, including the operating frequency bandwidth, for the said product.
- ii. Further, the platform was monitored periodically to verify the opposite party's compliance with the directions issued under the Show Cause Notice. Upon such monitoring, and as evidenced from the screenshots captured on **02.06.2025** and **06.06.2025 (Annexure-I is enclosed)**, it was observed that even after issuance of the Show Cause Notice, the impugned listings of walkie-talkie devices continued to exist on the platform without any corrective action or additional regulatory disclosures.

14. As per sub-section (1) of Section 19 of the Act, "The Central Authority may, after receiving any information or complaint or directions from the Central Government or of its own motion, conduct or cause to be conducted a preliminary inquiry as to whether there exists a prima facie case of violation of consumer rights or any unfair trade practice or any false or misleading advertisement, by any person, which is prejudicial to the public interest or to the interests of consumers and if it is satisfied

that there exists a prima facie case, it shall cause investigation to be made by the Director General or by the District Collector". After forming the satisfaction regarding existence of a prima facie case based on the reply of the opposite party and material available in hand, the matter was referred to DG investigation by CCPA's order dated 9th June 2025 for detailed investigation.

15. The Investigation Report dated 21st November 2025 which was received by CCPA on 3rd December 2025 recorded the following findings: -

- a. The investigation concluded that the opposite party had undertaken certain steps to delist non-compliant walkie-talkie products from its platform. However, despite these submissions, further verification revealed that walkie-talkie products lacking mandatory frequency disclosures continue to remain listed and available for purchase on the platform till date as of November 2025. The continued presence of such non-compliant listings reflects a clear lapse in the company's compliance and monitoring mechanisms and constitutes a violation of consumer rights under the Consumer Protection Act, 2019
- b. Further, this continued availability, even after receiving actual knowledge during the investigation, reflects the opposite party's failure to expeditiously remove or disable access to unlawful material, thereby constituting a breach of Section 79(3)(b) of the Information Technology Act, 2000. Consequently, the opposite party stands outside the protection of safe-harbour available to intermediaries under the Act.
- c. The product listings on the website omit critical consumer disclosures regarding frequency specifications, licensing obligations, and certification status, thereby violating the consumer's right to information and constituting misleading advertisement and unfair trade practice under Sections 2(9), 2(28), and 2(47) of the Consumer Protection Act, 2019.
- d. Additionally, opposite party's conduct is in violation of the Guidelines for the Prevention and Regulation of Illegal Listing and Sale of Radio Equipment including Walkie Talkies on E-commerce Platforms, 2025, which mandate proactive measures to prevent the sale of unauthorized radio communication devices.

- e. The appropriate due diligence mechanisms of non-compliant products as per extant statutory norms is non-existent on the opposite party's platform.
- f. Although, the opposite party submitted that it had removed all non-compliant walkie-talkie listings lacking mandatory frequency disclosures, subsequent verification revealed that new walkie-talkie products without the required disclosures appeared on the platform within days of the company's submission. This demonstrates the absence of an effective monitoring mechanism even after explicit notice during the investigation. Accordingly, the company's conduct indicates a violation of Rule 3(1)(d) of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, which obligates intermediaries to remove unlawful content upon notification by the authorized government agency.
- g. Investigation concluded that a case relating to the violation of consumer rights, misleading advertisement, deficiency in services and unfair trade practice under the Consumer Protection Act, 2019 stands established.

16. The Investigation Report in the present matter was forwarded to the opposite party vide letter dated 05 December 2025 for their information and for submission of their comments, if any. However, no response was received from the opposite party by the CCPA within the stipulated time.

17. An opportunity of hearing, as mandated under Section 21(8) of the Consumer Protection Act, 2019, was afforded to the Opposite Party on 12 December 2025. During the hearing, Adv. Vivek Ayyagari, Mr. Manas, Ms. Pranita, and Ms. Chanda appeared on behalf of the Opposite Party. They sought a short adjournment on the ground that they were not prepared to address the matter and required time to file their response to the DG Investigation Report. Considering the request made during the course of the hearing, a short adjournment was granted by CCPA. Accordingly, the Opposite Party was directed to submit its comments, if any, on the DG Investigation Report and was given another opportunity for hearing on 19th December 2025.

18. Pursuant to the opportunity granted by CCPA, the opposite party submitted its response to the Investigation Report vide communication dated 18 December 2025. In its submissions, the opposite party reiterated that it operates an online marketplace

platform and functions as an intermediary, facilitating transactions between independent third-party sellers and consumers.

- i. The opposite party submitted that, it has fully cooperated with the proceedings and has consistently clarified its limited and statutorily recognised role as an intermediary under Section 2(1)(w) of the Information Technology Act, 2000. ASSPL submitted that it operates an online marketplace at www.amazon.in, which merely facilitates interactions between independent third-party buyers and sellers, and that it neither manufactures, procures, lists, prices, offers for sale, nor sells any products, including the impugned walkie-talkie devices. It was submitted that product listings are created, controlled and uploaded solely by third-party sellers and that ASSPL does not initiate, select or modify the information contained in such listings.
- ii. Further, submitted that the Investigation Report fails to adequately distinguish between the statutory obligations of third-party sellers and those of a marketplace intermediary under the IT Act and the Consumer Protection (E-Commerce) Rules, 2020. It was contended that Rule 6 of the E-Commerce Rules squarely places the obligation to ensure accuracy, legality and completeness of product disclosures upon sellers, including disclosures mandated under applicable laws. Amazon stated that it complies with Rule 5 of the E-Commerce Rules by obtaining undertakings from sellers and by displaying information furnished by them, but that the substantive responsibility for regulatory disclosures rests with the sellers. In this regard, reliance was placed on the Amazon Services Business Solutions Agreement, which obligates sellers to ensure that products listed are legally compliant and that all information provided is complete and accurate.
- iii. Amazon submitted that the statutory framework under the Legal Metrology Act, 2009 and the Legal Metrology (Packaged Commodities) Rules, 2011 similarly places responsibility for mandatory declarations upon the manufacturer, packer, seller or importer, and not upon an online marketplace operating on a marketplace model. It was contended that the Investigation Report incorrectly attributes seller obligations to ASSPL, contrary to the statutory scheme.
- iv. With respect to the findings on violation of Section 79(3)(b) of the IT Act, Amazon submitted that the conclusion that it failed to expeditiously remove

unlawful material is factually and legally incorrect. Amazon stated that 'actual knowledge' under Section 79 arises only through a court order or a reasoned written intimation from an authorized government agency, as settled by the Hon'ble Supreme Court in *Shreya Singhal v. Union of India*. Amazon also submitted two other case laws of Hon'ble High Court of Delhi, in *Kent RO Systems Ltd. v. Amit Kotak* and Hon'ble High Court of Delhi in *Myspace Inc. v. Super Cassettes Industries Ltd.* emphasized that any direction to intermediaries must be specific, targeted, and confined to clearly identified infringing content.

- v. Amazon submitted that upon receipt of specific information through the Show Cause Notice it promptly disabled the identified listings and furnished seller details to the CCPA. It was contended that any subsequent appearance of similar listings is attributable to deliberate circumvention by errant sellers, and that 'actual knowledge' cannot be construed as a general or continuing obligation to proactively monitor all listings.
- vi. Amazon submitted that the Investigation Report incorrectly characterises its earlier clarifications as admissions of non-compliance. It was stated that ASSPL had only clarified that the concerned sellers had not furnished ETA/WPC certification or frequency details in their listings and that ASSPL does not independently collect such information. ASSPL contended that no admission of non-compliance was made and that the inference of deficiency in due diligence is based on an erroneous premise.
- vii. Amazon further submitted that the Investigation Report draws adverse inferences without considering material explanations placed on record, including the fact that the impugned products were prohibited from being listed on the marketplace and that reasonable mechanisms had been implemented to prevent such listings. It was submitted that sellers may nevertheless circumvent safeguards through evasive practices such as misspellings or misclassification, and that ASSPL acts expeditiously upon receiving specific information. ASSPL contended that due diligence under law is qualified by the standard of "reasonable efforts" and cannot be equated with absolute prevention or continuous proactive policing of the marketplace.
- viii. Amazon also submitted that certain findings in the Investigation Report travel beyond the scope of the Show Cause Notice, including alleged violations of the

Legal Metrology (Packaged Commodities) Rules, 2011 and the Guidelines for Prevention and Regulation of Illegal Listing and Sale of Radio Equipment including Walkie-Talkies on E-commerce Platforms, 2025. It was contended that these issues were never part of the Show Cause Notice and were introduced without notice or opportunity of hearing, rendering such findings contrary to principles of natural justice and beyond jurisdiction.

- ix. Amazon outlined the measures undertaken in discharge of its due diligence obligations, including contractual obligations imposed on sellers, maintenance of a list of prohibited products, implementation of mechanisms to restrict listings of impugned products, and enforcement actions such as takedown of listings and suspension or termination of seller accounts. Amazon reiterated that while proactive policing is not mandated under law, it has nevertheless adopted layered safeguards on a reasonable-efforts basis.
- x. In conclusion, Amazon submitted that the Investigation Report is vitiated by misapplication of the statutory scheme governing intermediaries, mischaracterisation of its submissions, non-consideration of material facts, and procedural overreach beyond the Show Cause Notice. ASSPL contended that the findings against it are legally unsustainable and liable to be set aside. The submissions were made without prejudice to its rights and contentions under law.

19. During the hearing on 19th December 2025, Adv. Nitin Sharma, Manav Raghuvanshi, Richa Bakshi (Sr. Corporate Counsel), and Praneetha Shivaprakash appeared on behalf of the opposite party. During the course of the hearing, the opposite party reiterated the submissions made in its written replies dated 05.06.2025 and 18.12.2025. The opposite party repeatedly asserted that it operates merely as an intermediary and, therefore, is not liable for the alleged violations.

20. While taking note of the submissions and measures outlined by the opposite party, the CCPA expressed concern that prohibited listings, hosting and advertisements had continued to appear even after issuance of notice and during the course of investigation. The CCPA observed that effective due diligence by a digital marketplace requires proactive and systemic safeguards, and that reliance solely on seller compliance or post-facto action may undermine consumer confidence and

expose consumers to legal and safety risks. In response, the opposite party submitted that, upon receipt of the Show Cause Notice, the opposite party had taken steps to delist all walkie-talkie product listings from its platform. However, it was contended that since the delisting process was carried out manually, certain inadvertent lapses had occurred.

21. The opposite party further during the hearing submitted that it is in the process of establishing a more robust and systematic mechanism to monitor and prevent the listing of non-compliant walkie-talkie products on its platform in the future.

22. Accordingly, CCPA recorded the oral submissions made by the Opposite Party during the hearing and provided opportunity to the opposite party to submit any written submission if any. The opposite party submitted no further submissions in respect to the above.

23. The Central Consumer Protection Authority (CCPA), after carefully considering the written submissions filed by the opposite party, the oral submissions advanced during hearing, and the Investigation Report submitted by the Director General (Investigation), records the following findings:

Continued Hosting of Non-Compliant Walkie-Talkie Listings

- i. Despite issuance of the Show Cause Notice and despite having actual knowledge of regulatory non-compliance, the opposite party continued to host, display, and permit the sale of walkie-talkie devices on its e-commerce platform till November 2025. These listings were made available for purchase without mandatory and material disclosures relating to:
 - licensing requirements under the Indian Telegraph Act, 1885 and the Indian Wireless Telegraphy Act, 1933;
 - operating frequency range and compliance with the authorised radio spectrum; and
 - Equipment Type Approval (ETA) and certification by the Wireless Planning and Coordination (WPC) Wing of the Ministry of Communications.

- ii. The continued availability and repeated re-appearance of such listings, even after specific regulatory intervention, demonstrates a clear failure of the compliance, monitoring, and oversight mechanisms claimed by the Opposite Party and establishes that the measures asserted to have been adopted were ineffective. Such conduct constitutes a violation of consumer rights guaranteed under the Consumer Protection Act, 2019.

Failure of Ex-Ante Due Diligence and Ineffectiveness of Strike-Based Enforcement

- iii. The Opposite Party has sought to justify its compliance framework by relying upon contractual undertakings obtained from sellers, maintenance of a prohibited products list, and a post-violation “strike-based” enforcement mechanism coupled with reactive takedowns. Such a framework inherently presupposes repeated violations and operates only after unlawful products have already been listed, promoted, and transacted. The listing, hosting, and promotion of regulated radio communication equipment without statutory approvals or mandatory disclosures is impermissible at the very threshold.
- iv. Consumers cannot reasonably be expected to assess complex technical compliance relating to radio frequency bands, spectrum authorisation, or licensing conditions. Any compliance framework that depends on consumer reporting, subsequent strikes, or reactive takedowns impermissibly shifts the burden of regulatory compliance onto consumers, defeating the very object of the Consumer Protection Act, 2019. The continued re-appearance of such listings even after regulatory intervention establishes that, in the absence of robust ex-ante safeguards, the strike-based mechanism adopted by the opposite party is wholly insufficient for a digital marketplace of its scale and reach.
- v. The Authority is unable to accept the compliance model asserted by the Opposite Party, whereby it disclaims responsibility for preventing the sale of goods that are illegal under Indian law, on the ground of being an intermediary, and confines its role to removing listings only after specific regulatory intimation. Such a framework effectively permits the unrestricted commercial dissemination of unlawful products until regulatory authorities intervene,

thereby exposing innocent consumers to illegal goods, legal consequences, and potential safety risks in the intervening period. This reactive, post-harm model is fundamentally incompatible with the object of the Consumer Protection Act, 2019, which is to prevent consumer harm, not merely to respond to it after it has occurred. When the subject matter itself is prohibited by law, the platform cannot abdicate responsibility by pleading technological neutrality.

- vi. The continued facilitation of such sales, even temporarily, results in real consumer detriment which cannot be undone by subsequent takedowns. A system which allows the sale of inherently unlawful products until formally directed to stop is not a compliance mechanism but a hazard to consumer rights and public interest. Such conduct amounts to a failure to exercise due care and undermines the statutory mandate to ensure fair, transparent, and lawful digital marketplaces.
- vii. Platforms such as the opposite party cannot function merely as passive intermediaries. E-commerce entities are required to take reasonable steps to prevent the listing and sale of prohibited or non-compliant products, as well as other illegal activities on their platform.

Listings as Advertisements and Liability of the Platform

- viii. Under the Consumer Protection Act, 2019, any digital dissemination of information that promotes, offers, or invites consumers to purchase goods constitutes advertising directed at consumers. Simultaneously, the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 recognise that intermediaries host, display, and make available third-party commercial communications.
- ix. Accordingly, where a structured digital platform enables public display, discovery, and promotion of goods with the object of attracting purchasers, such product listings assume the legal character of advertisements hosted and published through an intermediary system. The use of the term “listing” in this Order therefore includes its nature and effect as an advertisement hosted and disseminated by the opposite party.

Deliberate Omission of Material Information and Cheating of Consumers

- x. The investigation establishes that the product listings omitted material and essential disclosures relating to regulatory approvals, frequency specifications, and licensing obligations. Such omissions violate consumers' statutory right to information under Sections 2(9) and 2(11) of the Consumer Protection Act, 2019, and constitute misleading advertisements and unfair trade practices under Sections 2(28) and 2(47) of the said Act.
- xi. By enabling the promotion and sale of regulated wireless products while concealing mandatory legal requirements, the Opposite Party facilitated a false belief that the products were lawful for unrestricted use, thereby misleading and deceiving consumers and inducing purchases under false representations.

Sale of Illegal Frequency Devices and Mandatory ETA Disclosure

- xii. The investigation further reveals that certain walkie-talkie devices sold through the platform operate in the UHF frequency range of 400–470 MHz, which is expressly prohibited under Rule 3 of the Use of Low Power and Very Low Power Short Range Radio Frequency Devices (Exemption from Licensing Requirement) Rules, 2018.
- xiii. Equipment Type Approval (ETA) is mandatory for any person importing, manufacturing, or selling wireless products in India. ETA ensures consumer safety and compliance with authorised spectrum usage. The requirement of ETA therefore constitutes material and indispensable information that must be disclosed by manufacturers, sellers, importers, and platforms alike. The failure to disclose such information amounts to deliberate concealment of material facts.

Illegality of Listings and Platform Liability

- xiv. Accordingly, the walkie-talkie listings made available by sellers on the platform of the opposite party, without disclosure of ETA/WPC certification, are illegal and in violation of the Consumer Protection Act, 2019. Further, the offering for sale of walkie-talkie devices operating in the frequency range of 400–470 MHz, including products intended for foreign jurisdictions, is unlawful in India and cannot be sold without requisite licences and regulatory approvals.

Violation of Consumer Protection (E-Commerce) Rules, 2020

- xv. Under Rule 5 of the Consumer Protection (E-commerce) Rules, 2020, the opposite party is statutorily obligated to ensure that all information necessary for enabling consumers to make informed decisions at the pre-purchase stage is displayed prominently, clearly, and accessibly on its platform. The failure to ensure mandatory disclosures in respect of regulated wireless equipment constitutes a direct breach of the said Rules.

Loss of Intermediary Safe-Harbour Protection

- xvi. The Opposite Party has relied upon Section 79 of the Information Technology Act, 2000 and the judgment of the Hon'ble Supreme Court in *Shreya Singhal v. Union of India*, and the decisions of the Hon'ble High Court of Delhi in *Kent RO Systems Ltd. v. Amit Kotak* and *Myspace Inc. v. Super Cassettes Industries Ltd.*, to contend that directions to intermediaries must be specific, targeted, and confined to clearly identified unlawful content. The Authority has carefully considered these judgments. All three decisions were rendered in the context of online speech, copyright infringement, or trademark misuse, where the underlying subject matter was not per se unlawful, and illegality arose only upon judicial determination of whether particular content infringed legal rights. These judgments were intended to prevent arbitrary censorship and to ensure that intermediaries are not compelled to undertake subjective adjudication of lawful expression.
- xvii. The present case stands on an entirely different footing. The sale of walkie-talkie devices without mandatory ETA/WPC certification and in prohibited frequency bands is not a matter of disputed legality, but is ab initio illegal under the telecom and wireless regulatory framework in India. The illegality arises from objective statutory prohibitions and does not depend upon adjudication of competing private rights. Therefore, the rationale of the aforesaid judgments, which were rendered in the domain of online content regulation, cannot be invoked to shield the continued hosting, advertising, and commercial dissemination of products whose sale itself is prohibited by law. The reliance placed by the Opposite Party on these judgments is misconceived.

Violation of IT Intermediary Rules and Sector-Specific Guidelines

- xviii. The DOT public advisory dated 10th May 2016 issued by Ministry of Communications and IT, which can be accessed via the link <https://dot.gov.in/spectrummanagement/online-sale-or-purchase-wireless-sets-and-equipments> , which states that:

"3. In this regard, the on-line/ e-commerce companies may further note the following:

- ii. It is the responsibility of these intermediaries to follow certain due diligence guidelines as stated in the Information Technology (Intermediaries guidelines) Rules, 2011, which includes signing of "User Agreement" .*
- iii. In the instant case, there is a need for the Dealer Possession License (DPL) under the relevant provisions of the Indian Wireless Telegraphy Act 1933 by the seller for wireless equipment if it is in the licensed bands or "Equipment Type Approval (ETA)" if it is in the de-licensed band. The purchaser needs to obtain "frequency authorization/agreement in principle letter" from WPC Wing, DoT under Indian Telegraph Act 1885 before purchasing any equipment in the licensed bands and subsequently wireless operating license for the same after submitting required documents and spectrum charges/ fees. Therefore, the on-line intermediaries need to ensure that these statutory requirements are fulfilled.*

4. Therefore, it is reiterated that if there is any licensing/ statutory requirement on telecom equipment being sold or purchased, it will be the responsibility of those selling it or purchasing it, as well as of the online intermediaries facilitating such sale and purchase, that the relevant statutes of the Government are not violated."

- xix. The above advisory explicitly places responsibility on intermediaries to ensure that sellers and purchasers comply with statutory requirements. Opposite party's failure to take any pro-active steps since 2016 to verify or display ETA

and licensing information constitutes non-compliance with the advisory and demonstrates disregard for regulatory obligations.

- xx. Despite assurances of corrective action, subsequent verification revealed that new walkie-talkie listings lacking mandatory disclosures reappeared on the platform within days. This demonstrates the absence of an effective monitoring mechanism even after explicit regulatory notice. Accordingly, the opposite party is also found to be in violation of Rule 3(1)(d) of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, which obligates intermediaries to remove unlawful content upon notification by an authorized government agency.

24. Section 2(9) of the Consumer Protection Act, 2019 provides for the consumers right to be informed against the unfair trade practice. And this section puts a liability upon the manufacturer, seller and importer to disclose all the important information to the consumers.

25. Further section 2(47) of the Consumer Protection Act 2019 states that:

“unfair trade practice means a trade practice which, for the purpose of promoting the sale, use or supply of any goods or for the provisions of any service, adopts any unfair method or unfair or deceptive practice (d) represents that the goods or services have sponsorship, approval, performance, characteristics, accessories, uses or benefits which such goods or services do not have”.

26. Section- 2(28) of the Consumer protection Act, 2019 defines “misleading advertisement” in relation to any product or service to mean an advertisement, which—

- a) falsely describes such product or service; or
- b) Gives a false guarantee to, or is likely to mislead the consumers as to the nature, substance, quantity or quality of such product or service; or
- c) Conveys an express or implied representation which, if made by the manufacturer or seller or service provider thereof, would constitute an unfair trade practice; or
- d) Deliberately conceals important information;

27. From a bare reading of the above provisions of the Act, it is clear that any advertisement should:

- i. contain Truthful & honest representation of facts.
- ii. have assertions, guarantees only when backed by underlying credible and authentic material, study etc.
- iii. Not indulge in unfair Trade practice as defined in Section 2(47) of the Act. It should be free from false representation that the goods/services are of particular standard, quality [(section 2(47)(a)] and should not make false or misleading representation concerning the need for or usefulness of any goods or services (section 2(47)(f) of Consumer Protection Act with respect to unfair trade practice.
- iv. Disclose important information in such a manner that they are clear, prominent and extremely hard to miss for viewers/consumers so as to not conceal important information.

28. After due considerations of the submissions of the opposite party and the investigation report, CCPA concludes that:

- I. The opposite party continued to host, list, and facilitate the sale of walkie-talkie devices on its e-commerce platform without disclosure of mandatory technical and regulatory information, including the operating frequency band. No evidence was furnished by the opposite party to demonstrate that such devices possessed the requisite Equipment Type Approval (ETA) or certification from the Wireless Planning and Coordination (WPC) Wing of the Ministry of Communications. This finding is corroborated by the Annexure A and Annexure B of the DG investigation report.
- II. While the post-facto remedial measures claimed by the opposite party are noted, but ignorance of law cannot be accepted as a valid defence. The opposite party is an established and large-scale e-commerce platform operating in India and is expected to possess adequate knowledge of, and ensure compliance with, applicable telecom, wireless, and consumer protection regulations. Failure to do so amounts to negligence in discharging its statutory duties towards consumers.

- III. The product listings hosted on the website of the opposite party failed to disclose essential information relating to frequency specifications, licensing requirements, and certification status. The absence of such material disclosures deprived consumers of information necessary for making informed purchasing decisions and exposed them to potential legal and regulatory consequences arising from the use of unauthorized wireless equipment.
- IV. The failure of the opposite party to ensure that only lawful and compliant product information is displayed on its platform compromises consumer safety and constitutes violations of the statutory mandate under the Consumer Protection Act, 2019, including:
 - a. Section 2(9) – the consumer’s right to be informed;
 - b. Section 2(47)(d) – representing that goods have sponsorship, approval, or characteristics which they do not possess; and
 - c. Section 2(28)(iv) – deliberate concealment of material information.
 - d. Section 2(28)(i)- falsely describes such products or service;

29. The CCPA is empowered under Section- 20 & 21 of the Consumer Protection Act, 2019 to issue directions and if necessary, it may, by order, impose a penalty which may extend to ten lakh rupees and for every subsequent contravention may extend to fifty lakh rupees. Further, Section 21 (7) of the above Act prescribes that following may be regarded while determining the penalty:-

- a) the population and the area impacted or affected by such offence;
- b) the frequency and duration of such offence;
- c) the vulnerability of the class of persons likely to be adversely affected by such offence.
- d) Gross revenue from sales effected by virtue of such offence.

30. From the material available on record and the information gathered during the course of investigation, it is observed that the Opposite Party operates one of the largest e-commerce marketplaces in India, facilitating the listing, advertising, promotion, and sale of a wide range of consumer goods to buyers across the country through its online platform. The platform is accessible nationwide through its website and mobile applications, enabling consumers from multiple States and Union Territories to access, compare, and purchase products listed by third-party sellers.

Owing to the scale, reach, and technological architecture of the platform, the Opposite Party exercises substantial influence over consumer purchasing decisions and market visibility of products.

31. The investigation further reveals that the Opposite Party's platform enabled the listing and sale of walkie-talkie devices sourced through domestic supply chains, thereby making such devices available to a vast and geographically dispersed consumer base. Records placed on file establish that a total of 2,602 units of walkie-talkie devices were sold through the platform during the relevant period. Each of these transactions occurred in the absence of mandatory disclosures relating to operating frequency, licensing requirements, and Equipment Type Approval (ETA)/Wireless Planning and Coordination (WPC) certification, thereby exposing a large number of consumers to unauthorized and potentially illegal wireless communication equipment.

32. The sale of such regulated products without requisite disclosures and approvals has resulted in consumers being misled into believing that the walkie-talkie devices were lawful for unrestricted use in India, when in fact their possession and operation may attract legal and regulatory consequences under applicable telecom laws. Consumers who purchased these devices have consequently been cheated, exposed to regulatory risk, and deprived of their right to make an informed choice, solely due to the Opposite Party's failure to ensure lawful and transparent listings on its platform.

33. Given the scale of dissemination, the volume of sales, and the nationwide consumer outreach of the Opposite Party's platform, the misleading and non-compliant listings cannot be treated as isolated or inconsequential. Rather, they constitute dissemination of misleading advertisements on a platform with substantial market presence and extensive consumer reach, thereby aggravating the severity of the violation.

34. The opposite party has continued to list the impugned products even after CCPA notice. Therefore, even by its own interpretation of section 79 of the IT Act 2000 on safe harbor, the opposite party is in violation. The omission of the opposite to delist the products even after CCPA notice has stripped the opposite party of safe harbor exemption under IT Act 2000. Accordingly, the conduct of the Opposite Party attracts the applicability of Section 21(2) read with 21(7) of the Consumer Protection Act, 2019.

In light of the above facts and circumstances CCPA finds it necessary to impose of penalty for dissemination of misleading and non-compliant advertisements affecting a large number of consumers and public across the country as a class.

35. In view of the above, under section- 20 & 21 of the Consumer Protection Act. 2019, CCPA hereby issues the following direction to the opposite party:

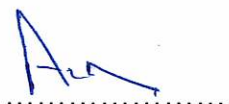
- a) In light of the nature of the violations detailed in the foregoing paragraphs, it is necessary that the opposite party is directed to pay a penalty of **₹10, 00,000/-** for indulging in misleading advertisement and unfair trade practice.
- b) The opposite party shall ensure that in future no walkie-talkies or any product requiring statutory approval/certification is listed, advertised or sold on its platform without full compliance with applicable laws and mandatory disclosures.
- c) The opposite party shall periodically carry out self-audit of its platform so that such violations of law through deceptive listings are not prevalent. It shall further publish certificate of such self-audit on their website in consumer interest.
- d) Submit a compliance report of the directions (a) & (b) above within 15 days of receipt of the Order.

The above order and directions are passed in exercise of the powers conferred upon CCPA under section 10, 20, 21 of the Consumer Protection Act 2019.



Nidhi Khare

Chief Commissioner



Anupam Mishra

Commissioner

ANNEXURE-I

amazon.in/C1177-Midland-Xt30-Pair/dp/B06WXLZF7/ref=sr_1_19?crid=3786E8AQ9NLHM&mb=ey2joIMS9.gwuOFXS2HY_k78-upWd8orNwW3GZmpO3D0y37afb-55mwi-rh-fmQO3xY-6wS_rc3g8ICKbqhokIZZD_0neLsfGK4o1DcBp7wCYh0eDlkhVcLmsk8...


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Electronics > Radio Communication > Two-Way Radio Sets



Roll over image to zoom in

Midland Xt30, Pair
Brand: Midland
4.0 ★★★★★ 320 ratings

-11% **₹8,500**
M.R.P.: ₹9,600

Inclusive of all taxes
EMI starts at ₹412. No Cost EMI available [EMI options](#)

Offers

Cashback Upto ₹255.00 cashback as Amazon Pay Balance when... 1 offer	No Cost EMI Upto ₹382.72 EMI interest savings on Amazon Pay ICICI... 1 offer	Bank Offer Upto ₹1,250.00 discount on select Credit Cards, HDFC... 28 offers	Partner Offers Get GST invoice and save up to 28% on business purchases 1 offer
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[7 days Returnable](#) [Free Delivery](#) [Secure transaction](#)

Brand Midland
Number of Channels 16
Talking Range Maximum 6 Kilometer
Voltage 12 Volts
Number of Batteries 6 AAA batteries required. (included)
[Report an issue with this product](#)

₹8,500⁰⁰
FREE delivery 4 - 7 June. Order within 14 hrs 34 mins. [Details](#)
Delivering to New Delhi 110003 - [Update location](#)

Only 2 left in stock.
Fulfilled by [walkie talkie enquiries](#)
Sold by [walkie talkie enquiries, a shop in Delhi-NCR](#)
Payment [Secure transaction](#)

Quantity: 1 [v](#)

[Add to Cart](#) [Buy Now](#)

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amazon.in/Walkie-Talkie-Toys-Kids-Outdoor/dp/B0F83RWQB8/ref=sr_1_1?crid=3786E8AQ9NLHM&mb=ey2joIMS9.gwuOFXS2HY_k78-upWd8orNwW3GZmpO3D0y37afb-55mwi-rh-fmQO3xY-6wS_rc3g8ICKbqhokIZZD_0neLsfGK4o1DcBp7wCYh0eDlkhVcLmsk8...


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Toys & Games > Electronic Toys > Walkie Talkies



Roll over image to zoom in

Walkie Talkie Toys for Kids – 2-Way Radio Toy for 3-12 Year Old Boys Girls, Up to 80 Meter Outdoor Range
Brand: Generic

-54% **₹599** (₹299.50 / count)
M.R.P.: ₹4,299

Inclusive of all taxes

Offers

Cashback Upto ₹17.00 cashback as Amazon Pay Balance when... 1 offer	Bank Offer Upto ₹1,250.00 discount on select Credit Cards, select... 31 offers	Partner Offers Get GST invoice and save up to 28% on business purchases. 1 offer
--	---	---

[7 days Returnable](#) [Free Delivery](#) [Amazon Delivered](#) [Secure transaction](#)

Brand Generic
Colour Yellow - Multicolor
Number of Channels 2
Special Feature Lightweight
Talking Range Maximum 80 Meter

About this item

- Real 2-Way Communication for Kids: These walkie talkies offer crystal-clear sound and simple push-to-talk functionality, ideal for children aged 3 to 12 for real-time chatting fun.
- Up to 80 Meter Outdoor Range: Kids can play across backyards, parks, or campsites with up to 80 meters of wireless range, encouraging outdoor play and exploration.
- Ergonomic & Child-Safe Design: Lightweight, durable, and made for small hands, these radios feature large buttons and a safe build perfect for young users.
- Ideal Gift for Boys & Girls: A perfect present for birthdays, holidays, or any occasion, this walkie

₹599⁰⁰ (₹299.50 / count)
FREE delivery Thursday, 5 June. [Details](#)
Or fastest delivery Wednesday, 4 June. Order within 22 hrs 42 mins. [Details](#)
Delivering to New Delhi 110003 - [Update location](#)

In stock
Delivered by [Amazon](#)
Sold by [4 u...](#)
Payment [Secure transaction](#)

Quantity: 1 [v](#)

[Add to Cart](#) [Buy Now](#)

[Add to Wish List](#)

Smartivity

Exciting DIY Kits for Smart Little Minds!
15% off Limited time deal
₹677⁰⁰ ₹799.00 [prime](#)

amazon.in/ELE-ESPIRIT-Die-Espirit-Electronics/dp/B0F3JPQCTC/ref=sr_1_2?rid=3786E8AQ9NLHM&idb=ej2j9oMSJ9.gwOFXSHY_K7B-upWd8orffWw3GZmpO3D0y37afb-55mmi-rh-fmQO34Y-6w5_rc3gBICKbqhoKIZZD_OneL5FGK4o1Dc8p7wC7b0eD4HwC...

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Toys & Games > Baby & Toddler Toys > Early Development & Activity Toys > Electronic Early Development Toys



Ele' Espirit Electronics (1)
Visit the ELE ESPRIT Store

-32% ₹11,499 (₹11,49,900 / 100 g)
M.R.P.: ₹16,999

Inclusive of all taxes
EMI starts at ₹557. No Cost EMI available. EMI options ▾

Offers

Bank Offer
Upto ₹1,250.00 discount on select Credit Cards, selec...
31 offers >

No Cost EMI
Upto ₹517.79 EMI interest savings on Amazon Pay ICICI...
1 offer >

Partner Offers
Get GST invoice and save up to 28% on business purchases.
1 offer >

7 days Returnable Free Delivery 6 Month Warranty Amazon Delivered Secure transaction

Size: 1

1	2	3
₹11,499.00 (₹11,49,900.00 / 100 g) ₹16,999.00	₹9,199.00 (₹9,19,900.00 / 100 g) ₹14,699.00	₹6,899.00 (₹6,89,900.00 / 100 g) ₹10,399.00

Perfect Adventure Kids Toys, situation can be real-time monitoring of children. Stay connecting with your friends and families especially in outdoor activities, the best outdoor toys for boys and girls.
[See more product details](#)

***₹11,499.00** (₹11,49,900.00 / 100 g)
FREE delivery Tuesday, 10 June.
[Details](#)


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In stock

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Sold by [Eskart Impex Private limited](#)
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Quantity: 1 ▾

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UJEAVETTE® Solar Electric Mechanical Dog Children's Educational Toy for Boys and Girls

Report an issue with this product

amazon.in/s?k=walkie+talkie&rid=19QJATZIBCE58spsrefix=walkie+talkie%2Caps%2C287&ref=nb_sb_noss_2

1-48 of 466 results for "walkie talkie" [Sort by: Featured](#)

Price
₹350 - ₹8,800+

Customer Review
★★★★☆ & Up

Brands
☐ PJ Power Joy

Discount
10% Off or more
25% Off or more
35% Off or more
50% Off or more
60% Off or more
70% Off or more

Item Condition
New

Pay On Delivery
☐ Eligible for Pay On Delivery

Category
Toys & Games
Walkie Talkies
Electronics
Rechargeable Batteries
Binoculars
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Two-Way Radio Sets
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☒ ☐

Availability
☐ Include Out of Stock

Seller
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Check each product page for other buying options.




Walkie Talkie Toys for Kids - 2-Way Radio Toy for 3-12 Year Old Boys Girls, Up to 80 Meter Outdoor Range | Only for Kids, Entertainment...

₹599 (₹299.50/count) M.R.P.: ₹1,199 (54% off)
prime
FREE delivery Tomorrow, 7 Jun
[Add to cart](#)




Ele' Espirit Electronics (1)

₹11,499 (₹11,49,900 / 100 g)
M.R.P.: ₹16,999 (32% off)
prime
FREE delivery Thu, 12 Jun
[Add to cart](#)




visionrabbit Li-ion Rechargeable Battery BL-5 3800mAh 7.4V for Two Way Radio Walkie Talkie Model BAOFENG UV-5R with C-Type...

₹2,599 (₹1,299.50/count) M.R.P.: ₹4,999 (48% off)
FREE delivery Wed, 11 Jun
[Add to cart](#)
More Buying Choices
₹2,199 (2 new offers)



Midland Xt30, Pair

₹8,500 M.R.P.: ₹9,500 (11% off)
FREE delivery 9 - 12 Jun
Only 2 left in stock.
[Add to cart](#)



Zeadio Versatile Two-Way Radio Case, Universal Durable Holster Pouch Case Holder for Two-Way Radio Walkie Talkies (ZNC-D, Pack ...)

₹799 M.R.P.: ₹1,199 (33% off)
prime
FREE delivery Tue, 10 Jun
Or fastest delivery Tomorrow, 7 Jun
[Add to cart](#)


amazon.in/Walkie-Talkie-Toys-Kids-Entertainment/dp/B0F3RWQBM/ref=sr_1_1?crid=19Q7ATIZIBCES&ib=ey2joiMSJ9.gwuOFX52HY_k7B-upWc8okKH4Hs9f_OqjmlN4lg8OGF3sMo0Kj-q2utb6kue8Zgp2YxwuTtEwNK3f958Q833CeGZhGleHLN0Xuk1ym...

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Walkie Talkie Toys for Kids – 2-Way Radio Toy for 3-12 Year Old Boys Girls, Up to 80 Meter Outdoor Range | Only for Kids, Entertainment Purpose Only

Brand: Generic

₹599⁰⁰ (₹299.50 / count)
 FREE delivery Tomorrow, 7 June. Order within 55 mins.
 Details

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In stock

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UIJAEVETTE Gaming Console 2.4G...
 ₹948⁰⁰ ₹1,499.00
 Shop now

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Bank Offer
 Upto ₹1,250.00 discount on select Credit Cards, HDFC...
 40 offers >

Partner Offers
 Get GST invoice and save up to 28% on business purchases.
 1 offer >

7 days Returnable Free Delivery Amazon Delivered Secure transaction

Brand Generic
Colour Yellow - Multicolor
Number of Channels 2
Special Feature Lightweight
Frequency Range 400-470 MHz

About this item

- Real 2-Way Communication for Kids: These walkie talkies offer crystal-clear sound and simple

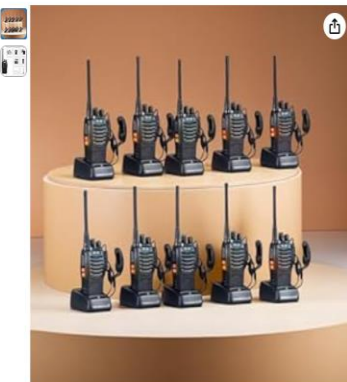
amazon.in/ELE-ESPIRIT-Ele-Espirit-Electronics/dp/B0F3JPQCTC/ref=sr_1_2?crid=19Q7ATIZIBCES&ib=ey2joiMSJ9.gwuOFX52HY_k7B-upWc8okKH4Hs9f_OqjmlN4lg8OGF3sMo0Kj-q2utb6kue8Zgp2YxwuTtEwNK3f958Q833CeGZhGleHLN0Xuk1ymx13WV...

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Toys & Games > Baby & Toddler Toys > Early Development & Activity Toys > Electronic Early Development Toys



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Ele' Espirit Electronics (1)

Visit the ELE ESPIRIT Store

₹11,499⁰⁰ (₹11,49,900 / 100 g)
 -32%
 FREE delivery Thursday, 12 June. Details

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 Sold by Elekart Impex Private Limited
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Add a Protection Plan:

☐ 1 Year Extended Warranty for ₹499.00
☐ 2 Year Extended Warranty for ₹895.00
☐ 1 Year Fire Protection Plan for ₹99.00

Quantity: 1

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 1 offer >

7 days Returnable Free Delivery 6 Month Warranty Amazon Delivered Secure transaction

Size: 1

Size	Price	Weight
1	₹11,499.00 (₹11,49,900.00 / 100 g)	₹11,499.00 / 100 g
2	₹9,199.00 (₹9,19,900.00 / 100 g)	₹9,199.00 / 100 g
3	₹6,899.00 (₹6,89,900.00 / 100 g)	₹6,899.00 / 100 g

Perfect Adventure Kids Toys, situation can be real-time monitoring of children. Stay connecting with your friends and families especially in outdoor activities, the best outdoor toys for boys and girls.

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