Response of Citibank, N.A. on
TRAI Consultation paper on Unsolicited Commercial Communication

Q.1 To what extent, time required for registration and enforcement can be reduced? For achieving reduced time lines, what changes in processes or in different entities e.g. PCPR, NCPR, CPDB may be required? Will providing scrubbing as a service for RTM reduces time? Please give your suggestions with reasons.

Suggestions:

- *Update of NCPR should be the first step & PCPR to become a request based access provided to respective telecom provider. Ideal reduction to 1-2 days from a good client experience standpoint*
- *Cloud based registration platform will also make the solution available 24*7 and implementable by RTMs on a real time basis.*

Q.2 How to ensure availability of Mobile Apps for registering preferences and complaints and for de-registration for all types of devices, operating systems and platforms? Whether white label TRAI Mobile App may be bundled along with other Apps or pre-installed with mobile devices for increasing penetration of app? For popularizing this app, what other initiatives can be taken? Please give your suggestions with reasons.

Suggestions/reasons:

- *App availability to be mandated as a regulatory norm to major Operating system providers – Google/Apple*
- *Customer to link the app with their mobile number, email*
- *Reports of historical complaints and customer pro-active measures can be sent as push notifications to customers through the app*
- *App will enable easy, accurate and structured capture of customer preferences & act as storage of full/partial consent, full/partial blockage of communication from customer perspective*
- *TRAI mobile app can certainly be white labeled for bundling on mobile devices. Govt guideline can help do the same. Amongst other initiatives, all relevant principals like banks, telecom cos, builders, etc. can promote the TRAI app on their respective websites, pop ups can be put up on the websites. Emails can also be sent to customers for using TRAI app. Additionally telecom providers can also provide the awareness of the TRAI app during all customer interactions*

Q.3 In case of Mobile Number Portability (MNP), what process may be defined for retaining the status of customer for preference registration? Please give your suggestions with reasons.

Suggestions/reasons:
- *For MNP cases, the customer preference from preceding connection should continue*
- *Only change being the update on PCPR will be transferred from Service provider A to B*
- *Customer should be updated of the continuance of preferences through SMS/Mail registered on the App*
- *Change/modification/deletion should only be initiated by the customer and not be telecom provider*

Q.4 How bulk registration may be allowed and what may be the process and documents to register in bulk on behalf of an organization or family? Please give your suggestions with reasons.

Suggestions/reasons:

- *'Register as family' to be provided as an option on App and OTP confirmation to be sent to the listed numbers for verification and completion*
- *NCPR update to happen immediate and respective PCPR registers (family members can have different connections)*
- *SMS/1909 facilities can take inputs of the additional mobile numbers alone from the subscriber/ primary requestor and initiate sms's to the numbers with links/OTP to authenticate registration*

Q.5 Is there a need to have more granularity in the choices to actually capture customers interest and additional dimensions of preferences like type of day, media type(s)? What will be impact of additional choices of preferences on various entities like CPRF, PCPR, NCPR, CPDB etc.? Please give your suggestions with reasons.

Suggestions/reasons:
- *Granular preferences would be relatively easier to add for the customer on the app – other avenues like SMS or email mode of registering would be a challenge*

High level of specificity in choices can help serve desired objective only when the end to end chain of flow – both sms or voice calls from UTMs is completely removed

Q.6 Should the scope of UCC regulation be enhanced to include unwanted calls like silent, obnoxious, threatening calls etc. and unauthorized communications.? What role government or constitutional organizations may play in curbing such activities? Please give your suggestions with reasons.

Suggestions/reasons:
- *At the outset, silent, obnoxious/threatening calls can be included under the scope of UCC regulations*

- *For all calls related to threats TRAI/Government - strict action once the same is proven – Enforcement authority to provide more assistance/resistance*

Q.7 What steps may be taken to address the issues arising from robo-calls and silent calls? What are the technical solutions available to deal with the issue? How international co-operation and collaboration may be helpful to address the issue? Please give your suggestions with reasons.

Suggestions/reasons:
- *Declaration by RTM while registration under NTR to include non-usage of Robot/silent calls etc*
- *The lack of control & devious means that these types of calls can be originated, leave no room for comfort from a regulatory setting*
- *Silent calls, are an avenue to bypass the TRAI norms and should be strictly penalized*
- *Common ground for telecom providers to share details of silent call numbers, source/origin, basis many customers calling them back immediately after a missed call should be established*
- *Telecom providers can also use the call duration – silent calls originate with a barely 1 second long missed call which is an extremely rare case from a customer to customer calling context*
- *Signature solutions(pattern detection) and Honeypots to be deployed by telecom providers, designed specifically for robot/silent calls – License cancellation upon non-compliance should be mandated*

Q.8 For robust verification and authentication of telemarketer getting registered, what changes in the process of registration, may be introduced? Please give your suggestions with reasons.

Suggestions/reasons:
- *While registering on NTR, a telemarketer should declare the origination of calls/sms by sharing latitude-longitude context*
- *Geo-tagging of originating offices/sources will result in greater control & a coded allocation of telecom resources by providers to telemarketers will mean curbing of UTM activity at OAP level itself*

Q.9 Should registration of other entities such as content providers, TMSEs, Principal Entities, or any other intermediaries be initiated to bring more effectiveness? Whether standard agreements can be specified for different entities to be entered into for playing any role in the chain? Please give your suggestions with reasons.

Suggestions/reasons:
- *TRAI should explore the creation of entities that will ensure delegation of responsibilities at different levels*
- *TRAI to have standard agreements with RTM, OAP, TAP & TMSE if required*
- *Every step of the chain originating from the RTM should be coded with RTM's license number – at access provider/TMSE/Content provider/scrubbing service provider*
- *TRAI to provide standard templates of agreement for RTMs to execute with their down chain entities as per requirement/service provided or taken*

Q.10 Whether new systems are required be established for the purpose of header registration, execution and management of contract agreements among entities, recording of consent taken by TMSEs, registration of content template and verification of content? Should these systems be established, operated and maintained by an independent agency or TRAI? Whether agency should operate on exclusive basis? What specific functions these systems should perform and if any charges for services then what will be the charges and from whom these will be charged? How the client database of TMSEs may be protected? Please give your suggestions with reasons.

Suggestions/reasons:
- *New systems are required for header registration, recording of customer consent taken, content templates & verification*
- *Contract agreements between involved entities can be explored in a tiered manner as suggested in Qn 9*
- *Header registration to be treated like a brand copyright – similar sounding/similar spelling headers etc cannot be obtained by others*
- *Customer consent taken can be maintained at an outsourced vendor's end on a cloud platform/server & checks/verifications can be on a case to case basis – Cost of maintaining the consent and ready retrieval can be funded by the content providers/business entities*
- *Content template and verification to be carried out at OAP's end & accountability ensured*

Q.11 Whether implementation of new system should full edged since beginning or it should be implemented in a phased manner? Whether an option can be given to participate on voluntary basis? Please give your suggestions with reasons.

Suggestions/reasons:
- *New systems should be launched in a staggered manner with the most critical changes given more time to be accepted and implemented by the entities*
- *No voluntary participation can be allowed - changes are required from a simplicity and future compatibility standpoint*

Q.12 Whether scrubbing as a service model may be helpful for protection of NCPR data? Whether OTP based authentication for queries made by individuals on NCPR portal may be helpful to protect NCPR data? What other mechanisms may be adopted to protect the data? Please give your suggestions with reasons.

Suggestions/reasons:

- *Yes, OTP based authentication will help ensure only authorized person from RTMs will initiate scrubbing process. NCPR data is not shared with any RTMs, NCPR only provides the registration status of all phone nos sent in scrubbing requests. NCPR data should be available to registered TM basis a valid agreement and restricted only to category /category basis the agreement. The Data should be on a cloud based platform and should have restricted access*

Q.13 What interface and functionality of NTR system may be made available to Principal entities for managing header assignments of their DSAs and authorized agents? How it may be helpful in providing better control and management of header life cycles assigned to DSAs and authorized entities? Please give your suggestions with reasons.

Suggestions/reasons:

- *Header assignment by PEs to their DSAs & authorized agents should be preceded by issuance of specific headers to PEs by TRAI basis requirement shared*
- *Basis list of approved headers by TRAI, PEs can authorize DSAs/agencies for specific time period to use the corresponding headers*
- *PE authorization to be a key component for any communication request raised to RTM by down chain entities*

Q.14 What changes do you suggest in header format and its structure that may be done to deal with new requirements of preferences, entities, purpose? How principal entities may be assigned blocks of headers and what charges may be applied? What guidelines may be issued and mechanism adopted for avoiding proximity match of headers with well-known entities? Please give your suggestions with reasons.

Abbreviations:

PE - Principal entities

RTM – Registered telemarketer

Suggestions/reasons:

- *Header assignment to PEs to be in lines with brand copyright norms – for eg ABCD bank, ABCD Bank, ABCD BK, ABCD bk, abcd bank, abcd bk, abcd BK will all be a single block of headers issued to one PE*
- *Headers can have a prefix of PRM & TRS to signify promotion & transaction respectively for customers to have an accurate understanding*
- *Charges can be basis the size of the headers' block being taken up by the PE*

Q.15 Whether voice calls should be permitted to TMSEs and how these can be identified by the customers? How intelligent network (IN) or IP Multi-media subsystem (IMS) based solutions may be useful for this purpose and what flexibility it may provide to TMSEs in operating it and having control on its authorized entities? Please give your suggestions with reasons.

Suggestions/reasons:
- *Traceability of TMSEs is currently a concern owing to a labyrinth of entities they operate with – be it RTMs or aggregators*
- *Voice calls can be allowed provided they are a RTM/or contracted to RTM*

Q.16 What steps need to be initiated to restore the sanctity of transactional SMS? What framework need to be prescribed for those transactional SMS which are not critical in nature? Please give your suggestions with reasons?

Suggestions/reasons:
- *TRAI to have a limited time window during the day for transactional SMS – for all SMSs other than ATM withdrawal, card swipe, online purchase – transactions wherein the customer has to get an immediate update*
- *Select window for SMS pushout during the day can help in effective tracking of SMS volumes and keep customer inconvenience at bay*
- *All TMSEs should be required to provide header categories under "Critical" and "Others" Category. All transactional messages under the Critical category must be sent out and permitted. However any other category must be backed with reproducible customer consent from the TMSE. Any breach to the others category must be treated as a gap to process and should have financial disincentive.*
- *Moderation of header assignment and flexibility during festive events/promotionsPreference to the customer on period of the year/opt in mechanism for offers*

Q.17 To what extent, present gap between time when UCC complaint was made and time when this was resolved can be reduced? What changes do you suggest to automate the process? Please give your suggestions with reasons.

Suggestions/reasons:
- *Currently TAP and OAP are provided with a 72 hrs window each when a UCC complaint is raised for resolution*
- *While 72 hrs is justified at OAP's end for investigation and action upon RTM/TMSE for the breach, the same window at TAP's end is not justified*
- *TAP, in current scenario, only checks the accuracy of the complaint, registration details of complainant and CDR records before passing the same to OAP for review – require additional information of history of complaints by the subscriber*
- *Origin of UCC complaint through Mobile App would enable TAT reduction significantly*

Q.18 How the medium of Customer Complaint Resource Functionality (CCRF) with pre-validation of data e.g. Mobile App, Web Portal etc. may be helpful to achieve better success rate in complaint resolution process? Please give your suggestions with reasons.

Suggestions/reasons:
- *Mobile App would pre-fill customer registration details, preferences etc*
- *The flow of information into the TAP/OAP process flow is quicker resulting in faster turnaround*
- *Pre validated data would provide historical trends of the customer's complaints – genuine vs fake complaints can be segregated faster – TRAI to look at past history and complaints*
- *App can have the built in functionality of capturing call/SMS records from specific set of numbers – 140 series, SMS headers etc for accurate data analytics, predictive modelling etc*

Q.19 Whether access providers may be asked to entertain complaints from customers who have not registered with NCPR in certain cases like UCC from UTM, promotional commercial communication beyond specified timings, fraudulent type of messages or calls etc.? What mechanism may be adopted to avoid promotional commercial communication during roaming or call forwarding cases? Please give your suggestions with reasons.

Suggestions/reasons:
- *Access providers should aim to resolve complaints from customers not registered on NCPR too – while the tracking may not be on the same lines as regular UCC complaints, these would help identify and take proactive actions against UTMs, data misuse, non-compliant RTMs etc*
- *In case of roaming/call forwarding cases, TAPs can be instructed to only complete communications within the respective telecom circle for promotional and non-critical transactional messages*
- *Content templates can be put in place at providers' end, for effective segregation of content*

Q.20 How the mobile App may be developed or enhanced for submitting complaints in an intelligent and intuitive manner? How to ensure that the required permissions from device operating systems or platforms are available to the mobile app to properly function? Please give your suggestions with reasons.

Suggestions/reasons:
- *TRAI mobile app to be promoted by all service providers/manufacturers & software providers App to have all required permissions on the phone by default, with the option of customer modifying as per choice when desired*
- *App can effectively map call and message records, consent, customer preferences etc and provide an excellent tool for analysis/make process more robust*

Q.21 Should the present structure of financial disincentive applicable for access providers be reviewed in case where timely and appropriate action was taken by OAP? What additional measures may be prescribed for Access Providers to mitigate UCC problem? Please give your suggestions with reasons.

Suggestions/reasons:
- *Present structure of financial disincentive should be continued for access providers*
- *TRAI can look at a slab based system wherein beyond a minimum threshold, UCC complaints raised will fall under the disincentive ambit*
- *Access providers will have to deeply strengthen their issuance process of commercial telecom resources to RTM, TMSE, aggregators etc – GPS tagging of office premises/call origination*
- *Claim of data misuse by UTMs by access providers is unacceptable as the issuance of telecom lines through due diligence & appropriate checks need to be in place*
- *Constant and effective signature solutions to be built with machine learning capabilities*

Q.22 Whether strict financial disincentives should be levied for different types of techniques like robocall, auto-dialer calls for UCC? Please give your suggestions with reasons.

Suggestions/reasons:
- *Strict penalties to be levied against robot & auto- dialer(non-registered ones)/silent calling entities*
- *Data security and safety is a big question mark in such cases and have far reaching implications*
- *Access providers to continuously develop honeypots to identify and fortify processes against such mechanisms*

Q.23 What enhancements can be done in signature solutions? What mechanism has to be established to share information among access providers for continuous evolution of signatures, rules, criteria? Please give your suggestions with reason.

Suggestions/reasons:
- *Signature solutions can look at replicating plagiarism/image/music detecting softwares that help identify similarity between multiple sources simultaneously*
- *Quick identification of the content having greater than a certain % of similarity is essential to narrow down source/telemarketer*
- *Solution could focus at OAP's end for content similarity identification and throw alerts of potential UCC threats*
- *Access providers could look at a rigor of engaging each month for transfer/discussion on pattern identification, rules/criteria changes*
- *Cloud based transfer of historical UCC identification, predictive analysis etc*

Q.24 How Artificial Intelligence (AI) can be used to improve performance of signature solution and detect newer UCC messages created by tweaking the content? Please give your suggestions with reasons.

Suggestions/reasons:
- *Signature solutions can look at replicating plagiarism/image/music detecting softwares that help identify similarity between multiple sources simultaneously*
- *Key mode of data changes include translation to other languages/text formats/strings/codes etc*
- *Solutions through artificial intelligence and machine learning for such tweaks should be regularly updated*

Q.25 How the honeypots can be helpful to detect and collect evidences for unsolicited communications? Who should deploy such honeypots? Please give your suggestions with reasons.

Suggestions/reasons:
- *Honeypots to have numbers pertaining to all segments of the society and not enrolled into DND*
- *Post getting active, the numbers will become a part of the communication base by telemarketers & act as a sampling test for compliant/non-compliant entities*
- *Regular growth of honeypot base and stringent action against defaulters is necessary*
- *Honeypots should be maintained by all access providers and tracking/monitoring of the communications to be done jointly with TRAI on a monthly frequency*

Q.26 Should the data from mobile app or from any other source for registering complaints be analyzed at central locations to develop intelligence through crowd sourcing? How actions against such defaulters be expedited? Please give your suggestions with reasons.

Suggestions/reasons:
- *Data should be analyzed at central locations to develop intelligence, take proactive measures and keep strengthening the system in a structured way at TRAI's end & inputs shared with all stakeholders*
- *Data from mobile app would also be more accurate, from the customer directly and extremely safe and pave way for efficient tracking*
- *Action against defaulters can be looked upon basis their upward entity chain – RTM/TMSE etc*

Q.27 How the increased complexity in scrubbing because of introduction of additional categories, sub-categories and dimensions in the preferences may be dealt with? Whether Scrubbing as a Service model may help in simplifying the process for RTMs? What type and size of list and details may be required to be uploaded by RTMs for scrubbing? Whether RTMs may be charged for this service and what charging model may be applicable? Please give your suggestions with reasons.

Suggestions/reasons:
- *Every RTM should declare its industry and should get responses only on customers registered for that industry type or registered for all*
- *Increased Data security norms to be met at RTM's end*
- *Scrubbing activities to be on a case to case, communication wise & applicable charges collected – Capture of each campaign details in a templated format is a must for tracking*

Q.28 How the cases of false complaints can be mitigated or eliminated? Whether complaints in cases when complainant is in business or commercial relationship with party against which complaint is being made or in case of family or friends may not be entertained? Whether there should be provision to issue notice before taking action and provision to put connection in suspend mode or to put capping on messages or calls till investigation is completed? Please give your suggestions with reasons.

Suggestions/reasons:
- *False complaints create an entire cycle of investigation resulting in loss of man hours*
- *TAP should have access to a base of customers mapped to their business/commercial relationships so that there can be a flagging of potential false complaint before being shared with OAP*
- *No current methodology to identify if complaint is against family or friends unless the customer registers at their end*
- *This concern can only be completely addressed with intelligence build up over a period of time, wherein the access providers can have a base of false complainants/mode of complaint etc can help in early identification*
- *During the investigation of complaints flagged as potential false, connections of telemarketers should not be suspended or capped*

Q.29 How the scoring system may be developed for UCC on the basis of various parameters using signature solutions of access providers? What other parameters can be considered to detect, investigate and mitigate the sources of UCC? How different access providers can collaborate?
Please give your suggestions with reasons

Suggestions/reasons:
- *Access providers could look at a rigor of engaging each month for transfer/discussion on pattern identification, rules/criteria changes and collaborate effectively*
- *Real time data from the mobile app, on the calls/messages received can help detecting UCC sources*
- *Scoring system can be based on historical patterns, time of communication, mode of communication, seasonality especially in case of promotional messages etc*
- *Segregation of product offerings by access providers between Business to Business and Business to Consumer, with effective authentication is essential for UCC mitigation in the long run*

Additionl Points:

- We would recommend a standard financial penalty on all offenders with linkage to financial institution. This will surely help in standardizing approach across the financial institutions.

- We would also recommend periodic meeting of Financial Institutions and TSP to have better coordination and information sharing.