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Mr. S.K. Gupta,
Advisor (Quality of service),
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhavan,
Jawahar Lal Nehru Marg (Old Minto Road),
New Delhi - 110 001

June 10, 2010

Dear Sir,

Sub.: Suggestions on 'Consultation Paper on Review of Telecom Unsolicited Commercial Communications Regulations'

With reference to the above Consultation paper published by the TRAI, we provide our response below for the Authority's consideration.

Background:

Telemarketing as a channel has been used effectively in promotion of products & services across various industries ranging from banking, financial services, telecom, insurance, FMCG, IT, public sector enterprises, etc.

Telemarketing & SMS or mobile marketing has been actively used to inform prospects & consumers on introduction of various products & services which they can avail of to make their interaction with the manufacturers & distributors easier, faster & direct.

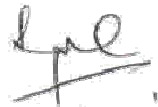
Telemarketing including SMS based marketing in a widely dispersed country like India offers an efficient mechanism to reach the farthest ends of the country riding on the backbone of the success of telecom revolution and is helping the industry further the cause of financial inclusion. The key benefits of using telemarketing channels are:

- *Providing access to financial and other services:* thus furthering the cause of financial inclusion
- *Creating awareness:* Dissemination of information & promotion of products & services.
- *Operational feasibility, efficiency & productivity:* Cost efficiently reach out across the country, enables outsourcing telemarketing processes to domain experts (domestic call centers) & focus on core businesses.

Proposed voluntary measures to facilitate NDNC compliance

Keeping in mind the valid concerns raised by the Authority, our insurance company would be willing to put the following additional processes in place, as "self regulation" measures, to facilitate compliance with the NDNC framework already in place:

1. We will ensure registration of telemarketing companies. We will ensure that in all our distribution agreements with channel partners and service providers a clause to this effect is inserted and we will obtain confirmation from them regarding their



registration and process for compliance to NDNC data scrubbing. Further we will also insert penalty clauses in all our agreements for non compliance to NDNC guidelines. We believe that this would help increase the penalties substantially from the current levels as per the Authorities regulations.

2. We will also suitably amend our existing arrangement with channel partners and service providers, in order to comply with the Unsolicited Commercial Communication Regulator.
3. We will institute a disciplinary action framework which provides for imposition of penalties for violation of TRAI regulations on the employees/agents of insurance company if they indulge in Unsolicited Customer Calling on DNC registered customers.
4. We will increase our efforts in creating awareness of this compliance requirement in the branch offices to ensure that all persons within the company are aware of the regulatory requirement and implications of non compliance thereto.

Further we request the Authority to evaluate taking the following steps:

1. Evaluate further steps to increase the levels of awareness by educating the general public with regard to registering on NDNC. The current registration base can be increased by conducting awareness campaigns, running education series through various modes of media, such as newspapers, magazines, television, etc. Even telephone bills, customer service centers/ outlets and websites of service providers could indicate NDNC numbers for the purpose of registration, especially highlighting the easy to use SMS based registration. In fact, statements pertaining to this may be mandated across all telecom customer communication in a minimum font size of 12 in a visible colour, placed prominently in the document to attract attention.
2. NDNC Registry could be tailored to suit customer needs on the basis of various categories. As such, if customer were to register in to the registry for not receiving calls pertaining to a particular category, e.g. home appliances, healthcare, financial services, etc, then his details would be scrubbed accordingly only.

Our Submission to the Authority

In view of the above, we request the Authority to continue with the existing regime of "National Do Not Call Registry".

Further, the matter has been discussed at the industry level and we believe companies are fully seized of the importance of adherence to compliance with TRAI regulations and are always available for extending necessary support to the Authority in it's initiatives to enforce compliance with the TRAI regulations.

Thanking you,

Yours truly,


Saroj K Panigrahi
Head-Legal, Compliance & Company Secretary.