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Mahanagar Door Sanchar Bhavan
Jawaharlal Nehru Marg (Old Minto Rd.)
New Delhi – 110002, India

Sub: ValueFirst response to the draft “The Telecom Commercial Customer Preference (Tenth Amendment) Regulations, 2012

Dear Sir,

We are pleased to provide our response to the draft “The Telecom Commercial Customer Preference (Tenth Amendment) Regulations, 2012”.

Through this regulation it is absolutely clear that the Authority is quite keen to ensure that telemarketing is not conducted in the country by unregistered telemarketers. This is a very welcome step.

We have only a few observations:

- a. Access Providers may have a challenge in the implementation of the proposed recommendations – i) additional process during the sign up of a new consumer and ii) periodic awareness to the entire consumer base. Access Providers may find this onerous from process and cost perspective.
- b. This regulation impacts the entire universe of telecom subscribers. It is unclear as to at what level does telemarketing begin and normal communication ends – for example an individual may be promoting the sale of his personal goods (e.g. second hand household furniture) to his friends. On a similar note Human Resource Department (HR) of a company could be communicating to prospective candidates by procuring their numbers from a job portal – will a few complaints lead to a such company or such an individual not having the ability to get any telecom resource for one full year.

It is our belief that we need stricter norms to prevent unregistered telemarketers from flouting the TCCCP regulations. However we must clearly define what

constitutes violation so that the regulation does not become draconian and hamper normal way of life for a telecom subscriber in the country.

Yours truly,

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