

Complaint Redressal process:

Current process:

1. DND customer complaints with his operator, on receipt of UCC message within 3 days.
2. Operator raise complaint with originating operator on NCPR portal for resolution (TAT 72 hrs)
3. Originated operator post CDR validation, forwards the complaint to respective platform provider
4. Platform provider would follow up with respective aggregator for necessary opt-in & submit it to originated operator.
5. This originated operator would in turn resolve the complaint on NCPR portal with respective remark based on opt-in provided
6. Resolved feedback in updated with complainant operator.
7. Touch points involved in complaint closure: TRAI; Operators; Platform providers; aggregators; end enterprise

Proposed process:

8. DND customer complaints with his operator, on receipt of UCC message within 4 to 24 hrs (can be reviewed).
9. Check for customer MDN & sender id on the central portal / mobile app for existing KYC details.
10. If customer details found on the portal against sender id with any entity registered as TM, operator can close the complaint directly stating "customer registered to receive communications".
11. Respective customer will receive an opt-out message for not receive any further communication from respective sender / enterprise.
12. If customer detail not found on portal, but identified the entity based on sender id necessary penalty may be levied to the entity upon validation of complaint & its opt-in details submitted by enterprise.
13. If customer detail & entity detail not found on portal, terminating operator may raise the complaint with the originating operator and the process will be continued from point -9.
14. Touch points involved in complaint closure: TRAI & operators, minimizing the levels & there by faster closure of complaints.

TM registration process:

Current process:

15. Enterprise can be registered as TM with TRAI by paying Rs.5000 valid for 5 years. Avail telecom resources from platform providers/operators by paying security deposits & necessary agreements in place.

Proposed process:

16. TM registration for retailers & aggregators should be separated and enterprise wise registration should be introduced
17. Every enterprise who wanted to sent messages to their registered/opted customers need to register with TRAI as registered enterprise - RGET.
18. Registration fee should be there for enterprise registration - Ex: Rs.1000 (or differential price based on business type - To be declared by TRAI)

19. **KYC & Contact SPOC details** to be mandatorily provided at time of registration, without which **RGET** registration not to be completed.
20. Their customer base KYC details to be updated weekly basis against to the DND base scrubbing at TRAI portal.
21. Based on the subscriber base, customer should be welcome note succeeding to opt-out option for promotional content.
22. Enterprise needs to send out opt-out process to all customers within 180 days from date of KYC details uploaded on portal.
23. In case UCC complaint from customer where he was already registered to receive such communications from enterprise, opt-out procedure needs to be communicated to customer further to avoid the complaints. And proof of opt-out procedure sent to be maintained by enterprise.
24. Operators, Platform Providers, Aggregators should not encourage the enterprises who are not registered with RGET

Sender id registration process:

Current process:

25. End enterprise is taking sender id's from registered telemarketers/resellers, they in turn taking resources from platform providers/operators.

Proposed process:

26. Enterprise would directly request & get approved from central portal, where they go approach resellers/aggregators with pre-approved sender id's along with their TM registered certificate.

Guidelines:

27. Sender id to have 6 digits alphabetic characters & should resemble the name of enterprise.
Eg: HDFCBK (HDFC Bank); HDFCLN (HDFC Bank Loans); etc...
28. No aggregator should have provision to allow open sender id for end enterprise.
29. Sender id should be unique & can't be allowed to multiple enterprises. To be validated on centralized portal.
30. Sender id cannot be nouns (Name; place; animal; things); telecom operator names (reserved id's like AIRTEL; DOCOMO; etc...); generic names like "ALERTS; SYSTEM; RESULT; etc...").
31. Enterprise to request for sender id's & should be approved (by TRAI/TRAI appointed 3rd party) on this portal & should use only those pre-approved sender id's.
32. Sender ID registration is mandatory and can be allowed with 1 to 10 based on case to case requirement and its justification

Proposed process changes:

33. No prepaid credits / accounts to be allowed to any enterprise by the aggregators. In such scenario, where any escalation received respective aggregator should be liable and can be penalized as per current penalty clauses.
34. No open sender id's to be allowed to any aggregators. I.e. enterprise/aggregator should not be able to create their own sender id per their wish.

35. TRAI to re-look at the validity of customer registrations based on sources of enterprise like "Info collected via enquiry forms; coupons filled at malls; websites visited (cookies); order placed/transaction done; customer self provided info while user registration/application forms.

Issues for Consultation

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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 exibility it may provide to TMSEs in operating it and having control on its authorized entities? Please give your suggestions with reasons.

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?

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

