

Comments on Consultation Paper

Consultation Paper dtd. 29th May, 2018 on Inputs for Draft Telecom Commercial Communication Customer Preference Regulation, 2018,

Most Humbly Sir,

First, our prima facie input on the draft regulation pertains to Section II. The regulation suggests registration of preferences using multiple dimensions such as Categories, Mode, Day and Time.

We are of the opinion that while such dimensions are technically achievable, additional dimensions will complicate the usability of the application and therefore risk the success. In the current TCCPR register, registration under the ALL category is almost 90% of the NCPR register.

Before proceeding with such complexity in the regulation we request that the authority apart from sandboxing the technology, does a consumer behavior study and sample of usability of the solution by end consumers. The Policy should be simplistic for end-consumers, access providers and users. If that is achieved the enforcement will also be easier to achieve.

Second, selection criteria of DLT server provider and security of user data needs to be given more detailed emphasis with exact service and security assurance criterion defined. This especially given that DLT providers often use public infrastructure for processing requirements. Even Content Management and Security is important since even Transactional Content is proprietary to agencies and any disclosure can lead to loss of competitive advantage.

Third, Section 25 (5) (ii) A – decreasing throughput even if complaints are found to be less than 10 in last seven days from unique subscribers can leave a UTM open to being a victim of regulatory sabotage by some malefactor. We suggest that there should be a minimum threshold also, say two or five, below which action may be less stringent than reducing throughput.

Regarding the remainder regulation, time is too short to peruse and respond in detail. If given an extension in timeline to respond, we will be keen to peruse the regulations for further comments. Nonetheless, we submit that it is of great and pioneering credit to the Authority on exploring block-chain as a technology for such a practical use.

Yours truly,

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