Note on ongoing DCA (Digital Consent Acquisition) Pilot for finalizing new Consent Registration Function (CRF)

1. Purpose and need for the Pilot initiative

This pilot project is an initiative by the Telecom Regulatory Authority of India (TRAI) and is supported by the Reserve Bank of India (RBI). Its ultimate objective is to ensure that the customers get promotional calls and messages from businesses and other entities (senders) only if they have given their consent to receive such call and messages.

Although TRAI has mandated a framework for acquiring the consent of the customers by the business for making promotional calls and sending messages, and also placing such consents on a shared digital platform of the Telecom Service Providers (TSPs) so that before any such communication is sent to the customer, his/her consent is verified yet its adoption by Business entities, including banks, has been minimal. This has resulted in a continued reliance on consents available with the senders in offline mode which are not updated on the digital platform for checking them in real time. Existence of such legacy consents in offline form often leads to opaque consent practices by the senders as it is not possible for the telecom service providers to verify such consents in real time. Therefore, such practices contribute to Unsolicited Commercial Communication (UCC) or spam, reliance on outdated consents, and loss of consumer trust in promotional channels. Furthermore, offline consents do not allow customers to access, view, or manage their consent preferences, forcing them to resort to complaints against senders—creating a lose-lose scenario for both businesses and customers.

The Digital Consent Acquisition Pilot has, therefore, been initiated to address these problems.

2. Participants in DCA Pilot

All the telecom service providers (Airtel, BSNL, Reliance Jio, QTL, RCOM, STPL, TTL and Vodafone Idea) and some of the major RBI-regulated banks, namely, SBI, PNB, Axis Bank, Bank of Maharashtra, Canara Bank, Kotak Mahindra Bank, IndusInd Bank, ICICI, HDFC, Indian Overseas Bank, and Punjab & Sind Bank are participating in this pilot project. These participating banks are uploading the existing consents of the customers, available with them, on sample basis to the shared digital platform of the TSPs, and will also upload new consents of the customers as and when these banks acquire such consents. After

the consents are placed on the digital platform, these consents will be checked by the TSPs before any promotional call or message is delivered to the customers.

The pilot also evaluates the technical readiness of all entities involved, test consent management by the customers, and identifies implementation challenges prior to nationwide deployment.

3. DND registration is necessary to make digital consent effective

Do Not Disturb (DND) registration provides customers with the ability to block promotional communication, while the Consent Registry empowers them to create specific exceptions for chosen entities, such as a bank. DND registration remains the foundational mechanism for exercising control over promotional communications. If a customer is not registered under DND, it is interpreted that the customer has implicitly consented to receive all categories of promotional communication, rendering any consent recorded in the Consent Registry operationally irrelevant.

DND registration can be completed easily through a few steps using the TRAI DND App. Customers may also register by calling or sending an SMS to 1909, or by using the mobile applications and websites of their respective TSP. Further, the TRAI DND App and the other channels mentioned above can also be used by customers to lodge complaints relating to spam or UCC in a convenient and time-bound manner.

4. Why you are receiving the Consent Notification

As part of this pilot, customers of participating banks may receive SMS from numbers beginning with 127 i.e. 127xxx. These notifications are sent by the telecom service provider to the customer whose consents have been uploaded on the digital consent registration platform.

5. Feedback:

Notifications are issued solely to test the revised process, verify that it is interoperable i.e. work across TSPs, and ensure system readiness before national rollout. Those receiving SMS notifications are requested to take the following actions:

i. Open the SMS received from 127xxx as part of the testing process.

ii. Use the link in SMS to access the consent portal and review how consent information is presented and managed.

iii. Verify customer-facing features, including consent visibility, revocation options, and user flow.

iv. Report observations or issues to the designated nodal officer/IT team, specifically on:

- Notification behaviour
- Portal accessibility and rendering
- Accuracy and completeness of consent records
- Revocation workflow and confirmation
- Any UI/UX or customer-journey inconsistencies

These inputs will support structured feedback, facilitate refinement of the consent workflow, and contribute to the successful execution of the pilot.

Thanks for your co-operation.

With Regards