

Dear Sir,

We have received your draft for “The\_Telecom\_Comm  
ercial\_Communications\_Customer\_Preference\_(Tenth\_Amendment)\_Regulations  
,\_2012”\_and\_consultation\_paper\_on\_review\_of\_measures\_taken\_for\_curbing\_u  
nsolicited\_commercial\_communication s.

We welcome such a proposal with the right intent, SMS and Call spam is a global nuisance which should be stopped immediately.

On our analysis of the draft, we felt that the basis of newer initiatives is:

- Ensuring only registered telemarketers are able to send promotional content.
- Unregistered telemarketers who are reported as spammers by DND/ non - DND subscribers are disconnected immediately.

While the amendment will certainly have impact on the imprudent Telemarketers / Spammers, spammers would attempt to exploit other channels which are perhaps not under the ambit of these drafts and other regulations.

Specifically, we hope adequate attention has been paid to the possibilities of [SMS spoofing](#) and [WAP Push](#) - as future tools in the hands of spammers.

- SMS spoofing is the practices of masking the real number/Sender by masquerading as some other telephone number.
- WAP Push is a technology for WAP enabled phones ( any smartphone) , using which promotional content can be pushed without even having a Sender/Telephone number on the message. These messages are not pushed via the regular SMS route, instead are sent through the data channel for phones where internet capabilities are enabled.

From our perspective, we have always believed this issue should be solved by:-

- Empowering user community to identify spam and leverage technology to aid them in blocking unwanted communication
- Creating a database of Spammers identified by community and make sure all communication/blocking is opt-in for users
- Making the Spammer database available publically free of cost to let users identify / and or block them through various means
- Identify the top spammers from the database and penalize / disconnect them

We stand by this belief and we have achieved reasonable success through Phone Warrior in moving towards the same, as of now we have more than 35000 registered users across the globe, from India, US, UK, Indonesia, South Africa and 132 other countries. Phone Warrior was amongst top 5 business apps at recently concluded mBillionth-2012. We are now the [#1 Free app for BlackBerry to block Text & Calls](#).

I have attached the Mobile spam industry report for July - 2012 which aims to uncover the nature of mobile spam in India's metros. We would also share the impact of TRAI's regulations on spam in India, once these are in effect.

Please let us know if you seek any other information.

Regards,  
Chandan Gupta  
Founder & Director

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