Subject: **Fwd: IndiGo: TRAI Consultation Paper on Unsolicited Commercial Communication**
To: rajender@trai.gov.in

Date: 11/03/17 02:52 PM
From: "Asit Kadayan, Advisor" <advqos@trai.gov.in>

image001.png (7kB)

-------- Original Message --------
From: **"Stephen Tame (IT,ISC)"** <Stephen.Tame@GOINDIGO.IN>
Date: Oct 10, 2017 12:11:55 PM
Subject: IndiGo: TRAI Consultation Paper on Unsolicited Commercial Communication
To: "advqos@trai.gov.in" <advqos@trai.gov.in>
Cc: "Vikram Chona (Corp,ISC)" <Vikram.Chona@GOINDIGO.IN>, "Praveen Gupta (ISC)" <Praveen.Gupta@GOINDIGO.IN>, "Stephen Tame (IT,ISC)" <Stephen.Tame@GOINDIGO.IN>

Dear Sir's,

We respectfully submit the following inputs to your request for public comment; as per your Consultation Paper on Unsolicited Commercial Communication issued 14th September 2017.

Whilst at IndiGo we are not Telecommunications operators nor Telecommunication experts, we do focus considerable efforts into our Customer Services and Customer Communications.

Two of our IndiGo core values are to be "Courteous" and "Hassle Free". With this as our foundation; to simplify and improve SMS communications to our customers, we wish to propose a number of suggested improvements to the SMS Commercial Communication standards and processes for TRAI consideration.

After reviewing your detailed consultation paper, we have supplied IndiGo inputs to your questions; Numbered 2; 6; 8; 14; 16; 24; 25; 26;
as a we are not Telecommunications specialists, we do not have any contributions we can assist with on the remaining questions.

I initially attempted to supply inputs via your website "Add Comments" Link, however I am having some trouble with Account Set-up; past few days, I received messages for the TRAI site "The username *Stephen.Tame* has not been activated or is blocked".

I have included all our IndiGo inputs into the email correspondence below; If you do wish for us to supply our inputs; in any other preferred form please advise.

Thanks and Regards

Steve

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Chapter 5 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.

No Inputs.

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.

There are a 3 alternative areas for consideration, adding a Regulatory Traditional APP; Leveraging the generally imbedded Telecommunication company supplied APP; or to take advantage of the Messaging technologies to deliver a regulatory and consumer functional outcome.

Traditional APP

A Pre-installed TRAI Mobile App being also part of commercial advertisement of the TSPs / Handset Manufacturers would initially be both cost and commercially effective; with the App upgraded as normal apps. In case of a Consumer needs to complain, TRAI mobile app would allow the Consumer to select the sender-id as complain which shall reach to TRAI server for further action.

A TRAI app working across all devices and OS platforms, will require initial and continuous investments in ensuring continued compatibility across all devices.

These regulatory traditional APPS in world examples across many countries, start well; through generally fail to survive past the first few years. The core problems are for these apps there is no persistent consumer exposure and experience, as the apps are rarely actually used. The cost benefits of consumer usage as tracked vs apps expense become problematic for regulatory agencies to continually justify their budgetary expenditures. These expenditures are ongoing as the App will continue needs to be upgraded , tested to ensure this continues to link across multiple devices, multiple organisations and multiple application versions.

Leveraging the Telecommunications Company APP

Consumers will continue to invest more time in the Telecommunication company supplied APPS, than any regulatory APP; as these provide depth of functions; across multimedia, music, movies, apps downloads etc.

It would be almost impossible to seek to imbed Regulatory APP components into these applications as the ongoing diversity of technologies, hardware and standards applied creates an ongoing delivery challenge.

However all websites and applications (APPS) today all have some Help/Assistance pages these pages cover the how to use or questions and answers for consumers. It can be seen across a number of countries and regulators/agencies where the regulator has required as a mandate that suppliers (Telecommunication companies) are required include regulator Help and references imbedded in their Help pages for both Website and Mobile APP.

For example a brief Help topic supplied by the regulators on managing “Do not Call” “Do not SMS”; and relevant Complaint Pages.

These Help Topics then also contains web links directly to the Regulator/Agency web pages for completion of any Preferences and or Registration of Complaints.

In this case investments significantly lighter; as regulators apply focus in the delivery of Web pages as the services. These services are then are linked into directly from any of the Telecommunications company’s APP Help/Assistance pages and WEB Help/Assistance.

Using Messaging Technologies to Supply services.

The real challenge for registration of preferences and registration of complaints is that this itself will takes time and effort from the consumer. Consumers today especially mobile consumers live in the here and now, the SMS was received now, the Annoying call

was received now. One hour onward all this is likely forgotten and consumer then unlikely to then go through set of processes / additional effort to register a complaint.

We need to challenge the process and thinking and determine how to we service the consumer problem and report the issues as this occurs; now. Ideally the consumer can simply and immediately register a complaint now. Here we can consider using the same messaging technologies to report the problem; as caused the problem. For example.

If Consumer receives an SMS, and the consumer wishes to complain. Then they can forward the SMS to “1909” where this is a short dialing code for TRAI in India)

Advise to Consumer:
Simply select the SMS on their phone and forward this message to 1909; also please include in the first line of the text enter the SenderID of the SMS message **“BANKBD”** this will then go the regulatory systems for processing.

If Consumer receives and Annoying commercial. Then they can forward this number as a complaint SMS to “1909”.

Advise to Consumer:
Simply copy the phone number from their phone and past this into an SMS message and send to “1909”.

Consumer are instantly registered based upon sending numbers and the complaint is instantly filled.

Consumers can see their complaints by progressing to the Regulatory Website and confirming their Mobile numbers and an OTP.

The Consumer can be given advice, feedback also through the same channel in this case the SenderID can be “1909’; as this is numeric code; customer can reply with a 1 this is OK; or a 2 please follow-up with a call.

It can be considered/agreed that “1909”, is a freecall, no charge SMS for the Consumer.

The Regulatory Systems Back End Processes. Will also require integration points into Telecommunications systems.

SMS: Core regulatory systems can then process and send automatically periodic reports to the SenderID’s of the number of SMS complaints received;
(If appropriate we can also share consumer numbers).

Automation will perform this without any efforts to the registered SenderID contact email (this is part of SenderID registration).

An SLA is agreed for SenderID to take action improve their ratings re complaints and if this exceeds as thresholds, over Weeks/Months

1. Then the sender ID is automatically suspended for say 5 days;

2. If this reoccurs then suspension for 10 days; and

3. Then perhaps one month or permanent deregistration.

Calls: Core systems then process and send automatically reports to the Caller (Telco's should have registered owners of these numbers). Numbers and ISDN dialing Blocks are managed by Telco's therefore Telco's will likely needs to send these emails out; when details are received from regulatory systems.

The objective is to send to the registered owner of the number; details of the complaints received; (If appropriate we can also share Consumer numbers).

Automation will perform this without any efforts; to registered owner the registered emails address of the out dial phone number or phone ISDN number blocks.

An SLA is agreed for registered number owner to take action improve their ratings re complaints and if this exceeds thresholds, over Weeks/Months

1. Then the phone number (or ISDN Block) is automatically suspended for say 5 days;

2. If this reoccurs then suspension for 10 days; and

3. Then perhaps one month or permanent deregistration.

The controls and measure will be driven be real-time active complaints against a SenderID/Caller. Reports and alarms are send automatically to Sender ID/Caller, and when these exceed agreed thresholds systems automatically will stop these SenderID's and Callers by issuing blocks on the Telecommunication companies for an agreed enforcement period. This is very similar to how the Email spam issues are managed across the world.

Q.3 In case of Mobile Number Portability (MNP), what process may be defined for retaining the status of Consumer for preference registration? Please give your suggestions with reasons.

No Inputs.

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.

No Inputs.

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.

No Inputs.

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.

With the removal of the cost barriers to marketing calling and with especially with the advent of IP based calling, marketing cold calls are becoming more annoying than SMS and or email. SMS and Email is at least noninvasive whereas calling is directly invasive for the consumer.

The technologies are developing fast, with machines and direct language capability becoming more advanced (refer SIRI, Alexa) where consumers can have conversation with the AI engines to action requests, perform tasks. It is only a matter of a few years for these AI engines to replace Call Center agents, and engage in direct callouts to consumers.

AI natural language calling will be the new marketing norm, and some efforts will needed to pre-empt the changes where calling replaces SMS as the fast growing problem in the telecommunications sector.

A number of countries support Silent Number and No Call lists. Whilst some care must be taken to separate Marketing cold calls (Consumer has no relationship with the calling business) from Consumer Service (Consumer has an active relationship with the calling business) and Transactional (Consumer has an active transaction in progress).

Offering a choice for Consumer to restricts call-in's is a service that is becoming very necessary for the Indian consumer.

Controls over the restrictions can become problematic, generally the telecommunication providers claim that cannot check every outbound call against a no calls list. Therefore this has to be a responsibility of the calling agencies (Call Centers) to check for any consumer general preferences for marketing calls and/or specific registrations for no call numbers.

Controls can be managed by TRAI APP; TRAI Website and/or Messaging Apps

TRAI APP / Website:

TRAI Mobile App, Website could apply filters the call based on the 'opt-in' / 'opt-out' option selected for various categories of the calls.

It could also allow user to classify unwanted calls / messages received from various numbers.

TRAI may fix a limit, wherein if an unidentified caller number is classified by certain number of users, it shall add to it TRAI Mobile app and Website as an updated list for all other mobiles.

Messaging:

As noted above, a consideration is for consumer to use messaging SMS to register complaints; simply copy the inbound phone number and send this as SMS to "872". This creates a Consumer mobile registration and filing of complaint. As systems and integrations become more advanced this could be extended.

We can consider after the mobile number is pasted into the SMS add "STOP"; this is then adds to the Consumers preference to "Stop" this number, messages sent to Telecommunication company to pass to the registered owner (Call Center) of the inbound number to stop calling this mobile.

If we can classify the nature of the inbound call into it type/classification then we can add "STOP ALL" this is then adds to the Consumers preference to "Stop" this number for all calls of this classification. A lot more complicated and then messages will needs to be sent to Telecommunication company to pass to the registered owner (Call Centers) for all inbound number that may may be of this classification.

It is possibly simpler to implement; and simpler for consumer if we focus on market complaints and SLA improvements as the key mechanisms for control. As outlined for this objective we to send to the registered owner of the number; details of the complaints received; (If appropriate we can also share Consumer numbers).

Automation will perform this without any efforts; to registered owner the registered emails address of the out dial phone number or phone ISDN number blocks.

An SLA is agreed for registered number owner to take action improve their ratings re complaints and if this exceeds thresholds, over Weeks/Months

1. Then the phone number (or ISDN Block) is automatically suspended for say 5 days;

2. If this reoccurs then suspension for 10 days; and

3. Then perhaps one month or permanent deregistration.

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.

No Inputs.

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.

Registration process should be simple, yet effective. Documents issued by Ministry of Corporate Affairs, Ministry of Finance and Ministry of Telecommunication as proof of identity, etc should be part of the registration process in order to appropriately identify marketers.

Registration for Marketing calls fall into two main categories;

Marketing cold calls (Consumer has no relationship with the calling business) and

Consumer Service (Consumer has an active relationship with the calling business).

Consumer should be able to opt in or opt out of these two areas.

There is also a third Category of Consumer communications

Transactional (Consumer has an active transaction in progress) these should be separated from general telemarketing controls with consideration to freeing this from some of the regulatory oversight.

We do also however also needs to take note that the Technologies in this space are also changing fast; falling outside of Telecommunication company and regulatory controls. Marketers are moving more now into the emerging connected Mobile Data consumers; India being one of the fastest growing in the world. Marketers are adopting the tools that are Data based rather than messaging limited to Telecommunications operators. Facebook Messenger; Facebook Messenger Lite; WhatsApp; WhatsApp for Business; and Hike etc. With a lower cost of operation, and richer Consumer experiences are the emerging as the SMS replacements. These channels are in effective use and growing very fast across India today.

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.

No Inputs.

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.

No Inputs.

Q.11 Whether implementation of new system should full fledged 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.

No Inputs.

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 NCPR2 portal may be helpful to protect NCPR data? What other mechanisms may be adopted to protect the data? Please give your suggestions with reasons.

No Inputs.

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.

No Inputs.

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.

SMS Headers, Form and Standards:

The header of SMS messages is the SenderID. As a general rule in SMS the maximum length allowed for message originator (SenderID --> &from=) is:

- 11 characters maximum length for Alphanumeric Originators
- 15 digits maximum length for Numeric Originators

The SenderID for the message originator in India is limited to 6 Characters (regulated by TRAI) this SenderID is alphanumeric and all Capitalized.

This is then used in the current message SenderID construct. XX-YYYYYY.

- Where XX is the circle code of the telecommunications circle where the message was sent.
- Where "-" is Hyphen
- Where YYYYYY is the Alpha code of the registered sender

For Example a bank we will call "BANK BD" this is then **DL-BANKDB** SenderID is company named '**BANKBD**'; Telecommunications Circle is '**DL**' or Delhi;

SMS SenderID Considerations:

With the adoption of any Alphanumeric as a component of the SMS Sender ID (SMS Header) the total length of the SMS SenderID will then be limited to 11 Characters. Therefore we must be very focused in the usage of any and all the Available character positions.

The key outcome must be to balance;

- Informing the Consumer of the message Sender (Originator)
- Protecting the Consumer from unsolicited, annoying spam messages; and

- Providing the Consumer with best possible management and function toolsets within the SMS messaging applications.

The inclusion of the Telecommunications Circle, in the current process adds limited Consumer value

Messages today can originate from any Circle and be received in any Circle. Messages from the same SenderID, can originate from Multiple Circles , this is an outcome of location of the SMS gateway technologies or suppliers rather than the location of the originating business, or location of the Consumer.

- The inclusion of the Circle code, adds a separation of the message Queues for the Consumer for the same SenderID, and arranged messages in application where the can be sorted by Circle rather than SenderID.

EG:
Messages from “BANK BD” Bank have Sender ID’s “AM- BANKDB”; AD-BANKDB”; “DM- BANKDB”, etc This is real example, all these messages are from the “BANK DB” Bank, though separated across multiple message queues in the SMS messaging application due to the inclusion of the Telecommunications Circle Code.

This adds some confusion for the Consumer as there are multiple message queues from the same SenderID, the separation of the message Queues creates more entries on the phone without contributing any consumer value. It also detracts from the clear identification, sorting and finding the SenderID.

- It would be far easier for the Consumer of all the Messages from “BANK DB” Bank we all collected in one place with one SenderID in this example all the messages received on the phone from “BANK DB” Bank would all be collected under one SenderID “BANKBD”.

It is suggested that these circle codes should be removed, from the new SMS SenderID standards. If these are still required for tracking then we could add these automatically into the first characters of the message content.

For Example

BankDB-CRD1 <<-Sender ID

AM <<-First line of Message Text for Tracking uses 3 Characters “AM” and Carriage Return
Thank you for using Debit Card ending 9999 <<- Message Text
For Rs. 1500.00 in GURUGRAM at XXXXX
on 2017-09-28:20:50:01 Avl
bal: Rs. 124000.00.52

The proposed Sender ID (SMS Header) standard for consideration.

YYYYYY-ZZZZ (this utilizes all the 11 characters that are available for the Alphanumeric SMS SenderID).

- **Where “YYYYYY” is the SenderID/Company Identification and Registration of message originator.**

- **“-“ is the hyphen or dash separator, though this could also represent a block, and**

- **“ZZZZ” is used to deliver customer services function.**

"YYYYYY" SenderID

This is the same as the registrations and controls today, requiring no changes in Consumer understanding or the current SenderID business registration processes.

The business identification and registration codes (6 Character Sender/Originator) as part of larger SenderID, is primarily for Consumer information and to exercise of some controls over registered businesses.

The question proposes some value in the name registration process.

Whilst some codes like dialing short codes for Consumer dialing or Internet domain names where the usage of these is Consumer outbound calling/searching for the Consumer into the registered business, can be considered to have some business value. As for these type of Consumer outbound codes/property the registered business can advertise the codes for example dial 131313; or go to www.BANK-BD.com. in this context these codes then inherit outbound business value.

For the SMS 6 Character Sender/Originator and part of the larger SenderID identification, once Alphanumeric is selected these cannot be used for response (some exceptions exist in some countries), therefore there will be no Consumer outbound into business opportunity and thus limited value or property; that can be advertised.

There is limited business value in the YYYYYY codes and these cannot be reused by the Consumer. Whilst there is value in the name/text of the registered business (message originator) for example "BANKBD", for the business and consumer. This value is though primarily benefiting the consumer with clarity of the message sender.

YYYYYY can be both Upper and or Lower Case
In the current standards the Business identification and registration codes (6 Character Sender/Originator) is limited to Upper Case only.

- The usage of ALL Upper case inside SMS, and for a number of messaging applications is generally perceived as yelling and a little insensitive, by social convention CAPITALISATION should always be limited or preferably not used at all.

- Whilst we cannot have separate businesses registering Upper case and mixed case variants, for example for "BANK BD" Bank we cannot have separate businesses register "BANKDB", "BankDB", "BANKdb" etc. If we treat these as all one and the same; we can consider relaxing the current ALL capitalization limitations.

Other than matching codes against a registration, there is no real technology driver to enforce CAPITALISATION only. The matching against a registration database can be managed simply by execution of a standard CAPS/UPPER function (a program/database standard), therefore "BANKDB" is equivalent to "Bankdb" or to any combination of Upper or lower case combinations of the same text.

This is the way email addresses work, it does not matter whether an email address is all upper; all lower; or a mix of Upper and lower this is all the same.

This process will needs to be verified with the registration database, however if this is allowed; we can maintained registrations and regulation matches as per current process, whilst we also open the opportunity to use Upper and Lower case for the message originators.

The "-" After YYYYYY as in "YYYYYY-" should be a usable character.

There was a request in the Question on how Principle business may be allocated blocks of headers (SenderID). Suggestion is if the business wishes to create multiple blocks for the same business then we can allow the use of the "-" position.

As outlined earlier in the Alphanumeric form for the SenderID; we will then be limited to 11 Characters. Therefore we must be very focused in the usage of any and all the Available character positions for beneficial outcome.

- The Principle business may decide to use “BANKDB-“ and their primary Block. The Registration validation and Consumer information remains contained in the first 6 Characters the “YYYYYY”.

- However after this “YYYYYY” the Principle business, may elect to replace the “-“ position with other characters, the allowed characters are alpha (a-z, A-Z) and numeric (0-9) characters, this generates a Block of 62 options in addition to “BankDB-“ this supplies “BankDBa” through “BankDBz;; ” BankDBA” through “BankDBZ” and “BankDB0” through “BankDB9”

- To Confirm, this would not change the current registration, validation or Consumer information; as this will remains focused only on the registration of the first 6 Characters the “YYYYYY”; “BANKDB” ; same as “BankDB”

The “ZZZZ“ after the “YYYYYY-“ should be for the benefit of the Consumer.

The final four characters should be available for the Sender for the classification and separation of SMS messages within the Messenger Application; for the best benefits and outcomes for the Consumer.

As an example; we receive many messages types from the “BANK DB” Bank, some marketing, some operational, some transactional and some security/OTP related. It is not easy to identify the SMS types as these are received across the SMS message queues; or to best manage, keep or delete these messages.

SMS message applications, allow for deletion of the entire SMS Queue as one action; or alternatively if you open the SMS Queue for the messages contained therein you can delete messages one at a time. If all messages are in one SMS Queue, it is almost impossible to work out what is important, and what is not, and deleting messages that are not important whilst saving messages that are important.

“ZZZZ” For the creation of Type/Classification of message queues; Examples

For Banking business “BANK DB” Bank

- A BANK DB Message Queue for Card Transactions, “BankDB-CRD1”; would accumulate all messages separately for review and management that are related to any transaction on the Bank DB Members card registered as CRD1.

- A BANK DB Message Queue for ATM Transactions, “BankDB-ATM”; would accumulate all messages separately for review and management that are related to any ATM transaction.

- A Bank DB Message Queue for OTP Transactions, “BankDB-OTP”; would accumulate all messages separately for review and management that are related to any OTP transactions.

- A BANK DB Message Queue for Card/Bank Statements, “BankDB-1709”; would accumulate all messages separately for review and management that are related to the Card/Bank Statements published for year 2017 and month 09.

There is balancing act to create enough separation of Queues and messages to deliver Consumer benefit and creating too many to detract from Consumer benefits. This is best left to Market/Consumer services forces between the sender and Consumer to strike an effective balance. Once the options become available we should expect to see innovation across this area.

For an Airline Business Air Express “AIRExps”

- An Air Express Message Queue for Airline Boarding passes, Flight notifications, Airport information Etc “AIRExps-MMDD” The use MMDD to accumulate all SMS messages relating to the Consumers Flights that is departing on the Month and Day; for example 0928; for all information for Air Express flights departing on the 28thof September 2017.

DEL – BOM flight departing on the 28thSeptember 2017. All relevant information of this day’s flights will be in this one Message Queue “AIRExps-0928” Itineraries, Boarding passes, Airport notifications, Flight notifications, Delay notifications Etc.

BOM – DEL flight departing on the 30thSeptember 2017. All relevant information of this day’s flights will be in this one Message Queue “AIRExps-0930” Itineraries, Boarding passes, Airport notifications, Flight notifications, Delay notifications Etc.

- General Consumer Marketing Messages, would be separated into in the “AIRExps” Message Queue. Note I have used the potential mixed case option.

The capability of separating SMS Queues generates significant improvement in classification of SMS messages and management over SMS Queues for the Consumer.

Q.15 Whether voice calls should be permitted to TMSEs and how these can be identified by the Consumers? How intelligent network (IN) or IP Multi-media subsystem (IMS) based solutions may be useful for this purpose and what flexibility it may provide to TMSEs in operating it and having control on its authorized entities? Please give your suggestions with reasons.

No Inputs.

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?

There is a clear separation in Consumer expectations and Consumer value between

- Marketing cold calls (Consumer has no relationship with the calling business)

- Consumer Service (Consumer has an active relationship with the calling business)

The Consumer should be able to opt in or opt out of these two areas; **and**

- Transactional (Consumer has an active transaction in progress)

We do needs to take some care in the developing digitalization of transactions and communication to Consumers for orders, delivery tracking, electronic receipts, and confirmation for electronic transactions and transfers. With the growing status of E-commerce across India, and the Strategy of the Indian Government for a “Digital India” and a “Cashless society”; transaction messaging capability is becoming a necessary foundation to support these initiatives.

Still, there must be a balance between utility, business communications, opportunity for Consumers to complain; whilst also supporting and fostering industry innovations.

- Senders (Originators) should still need to be registered and SMS SenderID standards applied as noted in the structure “YYYYYY”; this facilitates identification of the Sender and provides the capability for Consumers to register complaints.

- However as well as this registration, there are currently additional controls over the frameworks/structure of the messages themselves. These controls may restrict transaction communications and limit innovations.

- Whist some limitations may still be considered and applied to the “Marketing Cold Calls” and “Consumer Service”; Transactional messages for registered Senders, should perhaps be freed from any regulatory oversight for content and form.

As noted above; the Technology landscape is changing fast; with a connected India emerging out of the recent Telecommunications disruptions. Data is becoming the New telephony system, replacing traditional landline, analog voice and soon SMS. These SMS traditional services will be in major decline as Facebook Messenger and WhatsApp, continue to emerging as the replacement platforms for what was tradition SMS.

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.

No Inputs.

Q.18 How the medium of Cutomer 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.

No Inputs.

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.

No Inputs.

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.

No Inputs.

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.

No Inputs.

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.

No Inputs.

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.2

No Inputs.

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.

AI, and Machine learning are the disruption technologies changing the way we work and operate. They have the capability to stream/process masses of data and from this infer behavior irregularities and takes real-time action.

One of the best implementations with decades of improvement across message management is for the Global management of the Email SPAM problems. Not only endpoint Spam filters; whist these are still in place, they only now deal with the smaller issues.

Bulk Email Senders, today need to develop internet online reputations before they can run up volumes; each Sender ID is analyzed and checked for is behavioral characteristics and Consumer reactions. When these metrics are outside the acceptable parameters the address is automatically shut down.

The challenge in the consideration or implementation of toolsets like AI/Machine learning; in this context is that unlike the Internet (One network) the SMS gateways and Telco's operated across multiple network structures; there is no one central point of analysis possible

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.

Honey pots outside the Telecommunication number registrations processes have proven to be of limited effectiveness.

Telco's and their agents with privacy regulations should be limited in sharing any Consumer information names, mobile phones numbers outside their organisations. This is the first line of defense, at this stage of the process Honeypots can become useful to ensure compliance. A number of countries require Telco's to conduct regular audit tests in setting up new numbers (the volume is generally % of business). These number are set-up across the Telco offices and Agents networks, as a normal; consumer number however this is not used anywhere and becomes a Honeypot for verification of any leakage of Consumer data. This is then periodical repeated across the Teclo front of office locations.

Outside of verification of number registrations Honeypots become less effective. Unsolicited communications come from many sources; most untraceable. Consumers may share information with trusted Merchant (1); who the on sells, shares or is accessed by Merchant (2) and then this continues. In this case Honeypots will not achieve the desired results.

An alternative approach is regulatory authority based upon a complaint; to compel the Sender ID, to disclose the source of their data for this number; so that this can be followed-up for investigations on possible breach of Consumer privacy.

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.

All data should be analyzed at a central location, this will then deliver the necessary intelligence and targeting. Crowd sourcing is an interesting consideration, though not certain this will lend itself to this scenario. In order to engage crowd sourcing it will be necessary to share information on mobile numbers etc.. that should be generally be considered private.

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. 60

No Inputs.

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.

No Inputs.

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.

No Inputs.

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