

**Mr. A. Robert J. Ravi,
Advisor (CI & QoS)
TRAI, New Delhi**

Sir,

With reference to your mail dated 7th August, 2012, we are sending our comments on the draft "The Telecom Commercial Communications Customer Preference (Tenth Amendment) Regulations, 2012" as given below:-

1. There are a few sectors like Insurance which may primarily use personal number for telemarketing. – Ask Operator to impose penalty even to the company being promoted. No. holder may be an individual directly on the pay rolls of the insurance company. If not, then we may recommend registration of FIR against such person.
2. CAF – To specifically mention /undertake that the no. will not be used for any telemarketing purposes.
3. Capping of hourly limit of 100 SMS with a rider limit of 500 SMS on daily basis.
4. Black listing of defaulter for a specific period may be for 2 years. A common pool of database to be maintained by TRAI w.r.t defaulter to bar him any connection for next 2 years.

**Dr G S Sood
President**

**Society for Consumers' & Investors' Protection (Regd)
118, 2nd floor, DDA SITE 1, NEW RAJINDER NAGAR,
NEW DELHI-110060
INDIA, Ph:- +911128744789 Fax;- +911145082832**