Code of Practice (CoP) – Process for Registration, modification and Deregistration of Preferences and Recording & Revocation of Consent

A. Foreword:

I. This Code of Practice (CoP) is formulated to comply with TRAI's The Telecom Commercial Communications Customer Preference Regulations, 2018 ('TCCCP Regulations 2018').

II. This CoP deals with process steps for registration, modification and deregistration of different types of preferences including mode/time of delivery etc. It also deals with process to record and revoke the consent by a customer, for receiving messages from a particular Sender/Consent Acquirer and its header.

III. For avoidance of doubt, in the case of any difference between texts, the text set out in the TCCCP Regulations, 2018 shall take precedence. In case of any confusion in interpretation or clarification needed, the clarifications thus provided by respective Telecom Service Provider (TSP) shall be final and binding.

IV. This CoP is the outcome of mandate given in TCCCPR-2018 and has evolved with the joint initiative and concurrence of all the Access Providers.

V. It is to be clearly understood by all stakeholders that any modification to this CoP would be well within the right of TSP, with no liability of any financial claim or damages or any other adverse action, subject to suitable information of such changes being provided to concerned stakeholders.

Section II. Scope

The Scope of this CoP is to:

1. Effective control of Unsolicited Commercial Communication.
2. Comply with the TCCCP Regulation, 2018.
3. Cover process for Registration, Modification and Deregistration of Preference by consumer and its implementation with the TSP systems.
4. Cover process for Consent Recording and Revocation by consumer and its implementation with the TSP systems.
5. Provide Network system functioning conditions including SLAs and architecture regarding Preference
6. Provide minimum set of information which will be put on DLT system for sharing with different Entities and in between TSPs.

Section III. Process for Preference Registration, Modification and Deregistration

A. Default status for New and Existing customers:

1. Default status of all new connections activated post implementation, will be fully unblocked.

2. In case of existing customers, the default status post implementation, would remain the same as existing. This should be applicable between 1000 and 2100 hours on all days of the week from SMS & Voice mode.

3. Customer may choose to modify their preferences as per this CoP,. While registering through any channel, if customer does not select mode/day/time band etc., we should consider a default setting for such cases which may be like – all days of the week between 1000 and 2100 hours from all modes of communication. By default all commercial communications will be blocked from 2100 hours to 1000 hours. Customer can opt by unblocking same.

B. Modes of Registering and Modification and Deregistration of Preference

Following options of modes for Preference registration/modification/deregistration, will be provided by TSP:

1. Voice call – through 1909 through Agent assistant or customer can write to 1515@tatatel.co.in

2. Web Portal – TSP's website (authentication through OTP) https://telemarketer.tatateleservices.com:8082/#/subscriber-login

3. Any other means as may be prescribed by TRAI from time to time.-

C. Process for Registration, Modification and Deregistration of Preference

1. **Procedure for registration or change of preference of Categories of content for Commercial Communications: -**
   a) Customer can opt-out for any or all of following Commercial Communications Content category (ies)
   of content, as per Table-1 & its foot-notes of Annexure-1.
   b) Customer can opt-in for any or all of following Commercial Communications Content category (ies) of content, as per Table-2 and its foot-notes of Annexure-1.

2. **Procedure for registration of preference or change of preference of Mode for Commercial Communications:-**
   a) Customer can opt-out of any or all of following category(ies) of mode(s) of communication, as per Table-1 and its foot-notes of Annexure-2.
   b) Customer can opt-in of any or all of following category(ies) of mode(s) of communication, as per Table-2 and its foot-notes of Annexure-2.

3. **Procedure for registration or change of preference of Time band(s) for Commercial Communications:-**
   a) Customer can opt-out of any or all of following time bands for receiving of commercial communications, as per Table-1 and its foot-notes of Annexure-3
   b) Customer can opt-in for any or all of following time band(s) for receiving of commercial communications, as per Table-2 and its foot-notes of Annexure-3

4. **Procedure for registration or change of preference of Day Type(s) for Commercial Communications:-**
   a) Customer can opt-out of any or all of following day type(s), as per Table-1 and its footnotes of Annexure-4:
   b) Customer can opt-in for any or all of following day type(s), as per Table-2 and its footnotes of Annexure-4

5. **Guiding Rules**
   a) Fully Block category would provide for blocking of all promotional and service messages excluding transactional and Implicit messages. It will also exclude those service messages for which specific consent has already been provided by customer until and unless consent is digitally acquired in DLT.
   b) If a customer is in Fully blocked category, then selection of time band unblocking, will automatically put the customer in Fully Unblock category during the selected time band.
   c) If a customer is in Fully blocked category, then selection of day(s) unblocking, will automatically put the customer in Fully Unblock category during the selected day(s).
   d) If a customer is in Fully blocked category, then selection of modes unblocking, will automatically put the customer in Fully unblocked category for the selected mode.
   e) Similar treatment as per b) to d) above, will apply in case customer is in partially blocked category.

D. SLAs for Preference registration and its effectiveness

1. Receipt of customer's request of registration/modification/deregistration of preference will be duly acknowledged within fifteen minutes of the request made by the customer in DLT with Unique reference number (URN)..If customer writes to 1515@tatatel.co.in, SLA is 4 hrs.

2. The Registering TSP will share the requisite information (defined in subsequent Section VII.) on customer's preference with all other TSPs through DLT interconnected systems, within maximum of 8 hours

3. Every Access Provider shall ensure that preferences recorded or modified by the Subscriber are given effect to in near real time and in such a manner that no delivery of commercial communication is made or blocked in contravention to the Subscribers' preference after twenty four hours** or such time as the Authority may prescribe..

Section IV. Process for Recording and Revocation of Consent

A. Process for Recording of Consent-

"Consent" means any voluntary permission given by the customer to sender to receive commercial communication related to specific purpose, product or service. Consent may be explicit or inferred as defined in the Regulation.

"Consent Register" means a Distributed Ledger for Consent (DL-Consent) having all relevant details of consent acquired by sender, in a secure and safe manner, to send commercial communications and may be required for the purpose of pre and post checks for regulatory compliance based on the consent.

Principal Entities (PE) to create Consent Template with their DLT Registrar operator

Sample Consent Template

Thank you for connecting with ABCD Enterprise. We appreciate your interest in our offers, products, and services. We will be in touch with you via call or sms on your registered contact number to keep you updated on our latest products and offerings.

Modes of Digital Consent Acquisition

QR code-PEs can use the QR code to acquire the consent of customers
PEs to integrate QR Codes with consent acquisition modules and APIs to communicate with respective operators for consent acquisition

API integration -Principal Entities to integrate their POS with the APIs created by operators. PEs can select appropriate OAP for integration.
POS which can be integrated with APIs - Website, Mobile Application, Physical POS…etc

Website -option for single and manual consent acquisition through DLT.

Digital consent submitted to DLT by PE will be sent to respective Telecom Service Provider of the end subscriber for whom consent is received.

TSP to send SMS to Subscriber with Principal Entity name and Consent template to seek confirmation on Digital consent submitted by PE.

TSP will send Short code or link on which Subscriber has to respond with Y or N

If Subscriber responds back Y , then Consent gets recorded Digitally in DLT

- If Subscriber responds N , then Consent gets rejected
- If Subscriber doesn't respond, DLT will try 3 times to receive response post which the request will expire

In case Digital consent initiated and doesn't gets successfully recorded, PE can't initiate new request to acquire consent for next 3 months.

B. **Process for Revocation of Consent-** Consent Revocation process is applicable to only Terminating Access Provider. TTL is only OAP.

Section V. Network/System Functioning Conditions

1. Network/System Architecture

2. Standards, Specification and SLAs

3. Flowchart of Preference and Consent process

4. Message Sequence Charts for messages with parameter details and time sequence to provide details about the process between two entities and action taken by particular entity;

5. Flow Charts to provide details about the process between two entities and action taken;

Section VI. Consequence management

1. In case of default/breach in functions to be performed by respective Entities registered/appointed by TSP, TSP should take strict action against the same which may include warning notice, show cause notice, penalty, temporary or permanent termination etc.

Section VII. Information handover over DLT to Entities and/or other TSPs

A. DL-Preference

1. Recording preferences on Distributed Ledger for Preferences (DL-Preferences)

a) Access Provider shall automate its internal systems and develop appropriate APIs to interact with DL-Preferences;

b) Access Provider shall record preferences on DL-Preferences for requests received from all modes;

c) These revised preferences shall be available, in real time, for considerations by entities for scrubbing process for new list of telephone numbers under process, however, earlier messages or voice calls which have already been scrubbed and have validity may be delivered;

2. Every Access Provider shall establish, maintain and operate Distributed Ledger(s) for Preference (DL-Preference) with requisite functions, process and interfaces: -

a) to record choices of preference(s) exercised by the customer in the Distribute Ledger for Preferences (DL-Preferences) in an immutable and non repudiation manner;

b) to record, at least, following details of the customer who has registered its preference(s) for the main categories:
   (i) telephone number in the international numbering format as referred in the National Numbering Plan;

   (ii) lifetime history till the customer is active in its network, with date(s) and time stamp(s), of choices exercised by the customer for registering his preference(s) and subsequent changes to it made by the customer from time to time;

   (iii) changes in the subscription of telephone number, during the process of opening and closing of subscription;

   (iv) unique registration number issued at the time of registration of preference(s);

c) to interact and exchange information with other relevant entities, responsible to carry out functions for regulatory compliance(s), in a safe and secure manner;

d) to support any other functionalities as may be required to carry out functions for regulatory compliance(s);

Section VIII. Amendment to CoP

This CoP can be amended by respective TSPs at any given point in time subject to following:

a) It is understood that CoPs stipulate various requirements which are interlinked with CoPs of other TSPs as well. Considering the same, wherever the amendment can lead to change in information sharing with other TSP and/or billing, processing etc. with other TSP, such amendment should be shared with two weeks advance intimation before actually implementing the same.

b) Wherever there is any material change for any existing Sender(s) which impacts performance of its obligations, an advance notice of at least 7 calendar days along with changes and its effective date for such existing Sender(s), should be given on their respective registered email-id.

Section IX. Publication of CoP

This CoP is published by TTL on its website.

Further, on any amendment to the CoP, same should be published by TTL over its website.

Section X. Definitions

In this Code of Practice, unless the context otherwise, the Definition of various terms used under different clauses of the document will be according to the Definitions given under Regulation 2 of the Telecom Commercial Communications Customer Preference Regulations, 2018.

Section XI. Version History

The space below is provided to keep a track and record details of Amendments of this Document

S.no	Date	Details	Remarks
1	12.11.2018	Version1.1	
2	01.10.2024	Version 2.1	

Annexure-1

Table-A
Customer can opt-out of any or all of following category(ies) of mode(s)
of communication:

UCC Categories of Communication (Choices for Preference(s))	Select Options in DLT
All CC Categories to be blocked except transactional type of commercial communications	0
All CC Categories to be blocked except transactional & Service type of commercial communications	50
(i)Banking/Insurance/Financial products/credit cards	1
(ii) Real Estate,	2
(iii) Education,	3
(iv) Health,	4
(v)Consumer Goods and Automobiles,	5
(Vi)Communication/Broadcasting/Entertainment /IT,	6
(vii)Tourism and leisure,	7
(viii)Food and Beverages	8

Note : The RTM has to be categorised basis number series in order to segregate the call and handed over to DND scrubbing server. DND server should have the intelligent to identified the scrubbing on the basis of RTM number series

Note-1: In case of communication with customer executive of Customer Care Center of access provider, preference to opt-out may be communicated;
Note-2: Customer to be communicated with confirmation and final status along with options to unblock;
Note-3: Fully Block option shall put the customer in fully blocked state and block services as well promotional commercial communications from all categories of content, mode, time band and day types.
Note-4: BLOCK PROMO option shall block only promotional types of commercial communications for all categories of content, mode, time band and day types except service and transaction type of commercial communications;
Provided that the Authority may, from time to time, add or remove number of category(ies), or sub category(ies) for content.

Annexure-2

Table-A

Customer can opt-out of any or all of following category(ies) of mode(s) of communication:

UCC Mode of Communication (Choices for Preference(s))	Select Options in DLT
All Categories of Mode (to be blocked)	10
(ii) SMS,	12
(iii) Auto Dialler Call (With Pre-recorded Announcement),	13
(iv) Auto Dialler Call (With Connectivity to live agent),	14
(v) Robo-Calls,	15

Note : The RTM has to be categorised basis number series in order to segregate the call and handed over to DND scrubbing server. DND server should have the intelligent to identified the scrubbing on the basis of RTM number series

Note-1: In case of communication with customer executive of Customer Care Center of access provider, preference to opt-out may be communicated;

Note-2: Customer to be communicated with confirmation and final status along with options to unblock;

Note-3: BLOCK 10 option shall block all categories of modes except transactional type commercial communications while saving the status of customer for categories of time band and day types;

Provided that the Authority may, from time to time, add or remove number of category(ies), or sub category(ies) for mode;

Annexure-3

Table - A

Customer can opt-out of any or all of following time bands

UCC Time band for Communication (Choices for Preference(s))	Select Option in DLT
All Time Bands (to be blocked)	20
(i) 00:00 Hrs to 06:00 Hrs,	21
(ii) 06:00 Hrs to 08:00 Hrs,	22
(iii) 08:00 Hrs to 10:00 Hrs,	23
(iv) 10:00 Hrs to 12:00 Hrs,	24
(v) 12:00 Hrs to 14:00 Hrs,	25
(vi) 14:00 Hrs to 16:00 Hrs,	26
(vii) 16:00 Hrs to 18:00 Hrs,	27
(viii) 18:00 Hrs to 21:00 Hrs,	28

(ix) 21:00 Hrs to 24:00 Hrs,	29

Note-1: Time Bands (i), (ii), (iii) and (ix) shall be default OFF for all customers irrespective of the status of registration of customer i.e. for all customers including those who have not registered any type of preference(s), anytime unless customer has registered its preference(s) and switched ON;

Note-2: In case of communication with customer executive of Customer Care Center of access provider, preference to opt-out may be communicated;

Note-3: Customer to be communicated with confirmation and final status along with options to unblock;

Note-4: BLOCK 20 option shall block all categories of modes while saving current status of customer for categories of content, time band and day types, however transactional type of commercial communications may not be blocked;

Provided that the Authority may, from time to time, add or remove number of category(ies), or sub category(ies) for time band;

Annexure-4

Table - A

Customer can opt-out of any or all of following day type(s):

UCC Day Type(s) for receiving Communication (Choices for Preference(s))	Select Option in DLT
All Day Type(s) (to be blocked)	30
(i) Monday	31
(ii) Tuesday	32
(iii) Wednesday	33
(iv) Thursday	34
(v) Friday	35
(vi) Saturday	36
(vii) Sunday	37
(viii) Public Holiday and National Holiday	38

Note-1: In case of communication with customer executive of Customer Care Center of access provider, preference to opt-in may be communicated;

Note-2: Customer to be communicated with confirmation and final status along with options to unblock;

Note-3: BLOCK 30 option shall block all categories of types of days while saving the status of customer for categories of time band and day types, however transactional type of commercial communications may not be blocked;

Provided that the Authority may, from time to time, add or remove number of category(ies), or sub category(ies) for day type(s);