



Tata Teleservices Limited CoP (Code of Practice) – Complaints

Code of Practice for Complaint

A. Foreword:



1. This document is formulated to comply with “The Telecom Commercial Communications Customer Preference Regulations released dated July 19th, 2018 by the Telecom Authority of India (TRAI). (‘TCCCP Regulations 2018’) and the relevant TRAI directions and Guidelines.
2. This document can be here after named as “Code of Practice-Complaint handling or CoP-Complaint”
3. The Code of Practice formulated in this document only refers to the complaint handling related to the complaints received to Access provider by its subscribers for Unsolicited Commercial Communication.
4. For avoidance of doubt, in the case of any difference between texts, the text set out in the TCCCP Regulations, 2018 and the relevant TRAI directions and Guidelines shall take precedence. In case of any confusion in interpretation or clarification needed, the clarifications thus provided by “TSP name” shall be final and binding.
5. Any modification to this CoP would be well within the right of “TSP name”.
6. With no liability of any financial claim or damages or any other adverse action, subject to suitable information of such changes being provided to concern Entities.



B. Sections

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Section I. Scope

The Scope of this CoP is to:

1. Comply with the TCCCP Regulation, 2018 and its subsequent amendments and the relevant directions and Guidelines issued by TRAI from time to time.
2. Effective and timely handling and resolution of UCC complaints raised by customers.
3. Cover process and modes for registration of complaints by customers-Complaints received within 7 days of UCC (including the date of UCC) will be accepted as “complaints”, and complaints between 8 days to 15 days will be considered as Report.
 - a. Process for complaint handling, verification and resolution, including necessary action on UCC made by RTM & UTM.
 - b. Provide minimum set of information which will be put on DLT system for sharing with different Entities and in between TSPs.

Section II. Process for Complaint registration, verification and resolution

A Modes of Complaint Registration

1. Procedure for UCC Complaint registration through Voice Call

Sr.no.	Procedure
1	Customer to dial Toll Free number 1909 to register the UCC complaint. Customer to provide following details to customer care executive. a) Date of UCC communication received. b) SMS Header or Telephone number from which UCC received. c) Brief description of UCC received. d) Referred telephone number(s), if any. e) On Successful registration of complaint, customer will get unique reference number within 15 mins of complaint registration.
2	Procedure for UCC Complaint registration through TSP Website - DND Tab



	- Customer to provide mobile number/ Del number on which UCC is received. - OTP will be generated and sent to customer mobile number or registered email address. - customer to enter OTP and enter the UCC complaint registration page. - customer to provide details as mentioned in Point 1 and on successful registration of complaint unique reference number will be sent to customer email id.
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Section III. Process for Complaint Resolution and Remedial action against sender(s)

A. Complaint Mechanism:

1. Terminating Access Provider (TAP) shall verify if the date of receipt of complaint is within Seven days of receiving commercial communication and in case the complaint is reported by the customer after Seven days, the TAP shall communicate to the customer about the closure of his complaint in accordance to this CoP and change status of complaint on DL-Complaint as a report instead of complaint.
2. Post receipt of complaint through above-said modes, Terminating Access Provider (TAP) shall record the complaint on DL-Complaints and shall notify the details of the complaint to the concerned Originating Access Provider (OAP).
3. Post above mentioned steps , TAP shall assign the complaint to OAP
4. **In case the Complaint is related to Registered Telemarketer (RTM):** TTL (OAP) shall examine the Preference status of Complainant -

RTM (Registered Telemarketer) Complaint handling Process

- If complainant is DND registered then TTL (OAP) to notify RTM
- Else close the complaint as Customer not Registered- RTM /Preference Not Registered Category .

Note- The complaints where the DND preference is activated on the same date when complaint is registered then basis the time UCC occurrence the complaint will be closed as valid if the UCC is made after the DND activation time on DLT. It is noticed that due



to DLT Sync issues the DND preference is not updated in real time and in some cases it can lead to closure as invalid basis DND preference not registered.

a. Pre-checks would involve checking:

- i. CDR to check occurrence of complained communication
 - ii. Sender and Header/CLI was registered
- b. In case, all regulatory pre-checks were carried out and delivery of commercial communication to the recipient was in confirmation to the provisions of the regulation, OAP shall communicate to TAP to inform basis complainant about the closure of complaint as 'No Action required' basis the reason of such action- For example in case of CDR showing no such occurrence of complained communication, the OAP shall communicate to TAP to inform complainant about the closure of complaint as "CDR Not Match".
- c. The following scenarios / rejection reasons are those where no action is required to be taken against the reported RTM/ Sender. The reason for each one of these is self - explanatory, and these complaints do not require any further investigation nor seek any further information/ justification from the RTM /Sender.

Sr. No	Type of Rejection
1	Not a UCC
2	Service SMS/Call
3.	Not promotional in nature
4	Incomplete /incorrect info
5	Customer not registered/ Preference not blocked
6	Complaint wrongly routed
8	Duplicate complaint
9	UCC > 7 Days Old - Report
10	Call Forwarding

- c. In case, any of the regulatory pre-checks were not carried out, the OAP shall take actions against the defaulting entity and communicate to TAP to inform the complainant about the action taken against his complaint through DL-Complaints.



- d. For every valid complaint, a warning/notice is being issued to Entity/RTM;
 - (b) In addition to the above, all headers and templates are reviewed and blacklisted as required.
 - (c) In extreme cases, even the PE is blacklisted.

RTM SMS –

- TM Delivery is the customer who is registered with OAP, any fraud/Spam is through SMS template which is registered by Principal Entity and Approved by TSP.
- In case of any Valid complaint, Action is taken on Entity w.r.t to Template blacklist/Header Blacklist and to an extent of PE blacklist.
- In suspected fraud cases physical verification of PE registered address is carried out and if found negative PE is blacklisted.
- TM Delivery are disconnected & blacklisted in case of reported fraud by DOT /TRAI or any competent authority.

RTM Voice

- All voice calls are duly scrubbed against the preference and consent hence no calls gets connected to DND customers.
 - The incidence can happen only in case of technical glitch related to scrubbing failure or DLT sync issues for DND status updation in DLT. Hence no Violation on 140XX.
 - 140XX , to be disconnected & blacklisted in case of reported fraud by DOT /TRAI or any competent authority.
 - RTM can also get blacklisted incase multiple complaints registered against them for making fraudulent calls (eg threatening calls, Impersonation of TRAI/DoT /Police etc, blackmailing calls , any anti social activity etc)
- e. In case, any violation occurs due to incorrect template registered, complaint to be closed as Valid and Template will be blacklisted and communicated to Original Registrar TSP to evaluate the other Templates of Entity. No Violation to be tagged against the Telemarketer/Sender and no penalty applicable to TM or OAP.
 - f. In case where complaint registered is for VNO , the complaints are forwarded to respective VNOs for further action. We request VNO to respond within 5 days of



complaint notification sent, cases where response is received within timelines are closed invalid , else the complaints are closed as valid and reported in PMR.

VNO is directly responsible for submission of any clarification in regard closure of complaints.

- g. In case the complaint is found to be because of failure of Scrubbing, remedial action will be taken at N/w and IT end. Complaint will be closed under reason reflecting technical issue with no violation marked on TM/ PE.

Unregistered Telemarketer (UTM) Complaint Handling Process-

5. **For the Complaint in relation to communications via 1600xxx and SMS/Calls in initiated by the Unregistered Telemarketer (UTM):** The OAP

Step 1: Verification of Communication (CDR Validation):

1. Upon receipt of a complaint, the Originating Access Provider (OAP) notification is sent to sender on same day.
2. OAP shall examine the Communication Detail Records (CDRs) to verify occurrence of the complained communication between the complainant and the reported number.
3. For every complaint where communication occurrence is established, the OAP shall issue a notice to the reported sender, informing them of the complaint and advising compliance with regulatory provisions.
4. If no communication record is found:
 - o OAP shall inform the Terminating Access Provider (TAP) for closure of complaint as:
"No CDR found for the reported UCC."

Step 2: Complaint Pattern Assessment:

5. Where communication occurrence is confirmed, OAP shall assess complaint history against the sender using complaint data available with the Access provider.
6. Based on assessment:



- a. Where ≥ 5 valid complaints/reports are received from five different recipients within the preceding ten (10) days:
 - o Detailed investigation shall be initiated.
- b. Where < 5 valid complaints/reports within the preceding ten (10) days:
 - o Complaint shall be closed with action status: "Notice Issued to Subscriber."

Investigation & Enforcement Process Against UTM

Step 3: Investigation

In the cases meeting the complaint threshold, OAP shall:

- o Provide opportunity to the sender for representation through notice already issued; and
- o Complete investigation within five (5) business days from initiation to determine whether the communication constitutes UCC.

Step 4: Action on Confirmation of UCC

If sender is established to have transmitted Unsolicited Commercial Communication, the following actions shall apply:

- i. First Instance of Violation:
 - Impose Outgoing (OG) barring on all active telecom resources of the sender for fifteen (15) days;
 - Share action details across all Access Providers for implementation of similar OG barring across networks.
- ii. Second Instance of Violation:
 - The existing process flow shall continue to apply after imposition of the first violation, i.e., 15-day OG barring of all telecom resources.
 - In case fresh complaints are received against the sender after completion of the 15-day barring period, the assessment shall restart to examine whether five (5) valid complaints have been received within the last ten (10) days.

Action while putting the sender in second violation:

- Disconnect all telecom resources of the sender for one (1) year;
- Place sender under Blacklist Category;
- Notify all Access Providers to refrain from allocation of new telecom resources to such sender for up to one (1) year.

**Step 5: Restoration / Regulatory Review:**

Telecom resources subjected to barring or disconnection shall be maintained under temporary suspension and not permanently disconnected, enabling review by the Telecom Regulatory Authority of India (TRAI), which may order restoration or removal of restrictions, as appropriate.

Section V. Information handover over DLT between TAP and OAP**1. By TAP: On receipt of Complaint**

- a. Date and time (if reported by complainant) of UCC
- b. Date and time of receipt of complaint
- c. Sender and recipient of complained UCC
- d. Unique reference number
- e. Text as captured during the registration of complaint
- f. Reference number mentioned in complaint, if any.

2. By OAP, after investigation

- a. Unique reference number
- b. Date and time of receipt of complaint
- c. Date and time (if reported by complainant) of UCC
- d. Complainant Number
- e. Header/number from which UCC is received
- f. TAP name
- g. TAP Service area
- h. Date of UCC referred to OAP
- i. UCC TYPE (Voice or SMS)
- j. Description of UCC
- k. CDR status (Matched/Not Matched)
- l. Action Taken

Section VII. Amendment to CoP

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

It is understood that the Codes of Practice (CoPs) prescribe various requirements which are interlinked with the CoPs of other TSPs as well. In view of the same, any amendment that may result in changes impacting information sharing, billing, processing, or other



operational aspects involving other TSPs should be shared and mutually discussed with the concerned TSPs prior to implementation.

Section VIII. Publication of CoP

This CoP may be published by TSP on its website after the implementation of the new systems and processes. Further, on any amendment to the CoP, same may be published by TSP over its website.

Section IX. Definitions

The definitions would be as per the definitions contained in TRAI's TCCCP Regulations, 2018 and its subsequent amendments as issued by TRAI from time to time.

Section X. Version History

Sr. No	Version Number	Date of Submission to TRAI	Effective Date of CoP	Main/Amendment Number
1	TTL_CoP_Complaints 1.0	10 th October 2018	As per clause mentioned in CoP	Main
2.	TTL_CoP_Complaints 2.0	31 st Jan 2019	As per clause mentioned in CoP	Amendment
3	TTL COP Complaints 3.0	31 Jan 2021	As per clause mentioned in CoP	Amendment
4	TTL COP Complaints 3.0	24.01.2024	As per clause mentioned in CoP	Amendment



5	TTL COP Complaints 4.0	01.08.2025	As per clause mentioned in CoP	Amendment
6	TTL COP Complaints 5.0	28.02.2026	As per clause mentioned in CoP	Amendment