



Code of Practice for Entities (CoP-Entities)



A. Foreword:

- I. This Code of Practice (CoP) is formulated to comply with TRAI's The Telecom Commercial Communications Customer Preference Regulations, 2018 (6 of 2018) ('TCCCP Regulations 2018') as amended from time to time
- II. This CoP deals with various entities involved in performing various functions as required under the said regulation and prescribes the functions to be performed by them.
- III. For avoidance of doubt, in case of any difference between texts, the text set out in the TCCCP Regulations, 2018 and its subsequent amendments and relevant directions 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 its subsequent amendments and relevant directions and has evolved mostly 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.



B. Sections

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Section I. Effective Date

As per Regulation, TRAI can give inputs to the CoP post its submission. amended for any further suggestions. There are few scenarios which makes it important to implement as part of COP so that action can be taken on the entities involved in UCC generation effectively.

Section II. Scope

The Scope of this CoP is to:

1. Comply with the TCCCP Regulation, 2018 & as amended from time to time and relevant directions.
2. Effective control of Unsolicited Commercial Communication.
3. Provide for appointment of various Entities (internally managed within TSP or delegated to a partner entity) who would perform the respective functions assigned as per TCCCP Regulation and/or this CoP.
4. Cover process for registration of 'Sender(s)' (i.e. Principal Entities, TM, or Content Providers) and their obligations, who will be assigned and allocated the headers (SMS or Voice CLIs), Consent mechanism, Consent management tools, Whitelisting their URLs/APKs/CTAs, etc., Content and Header registration, validation and Scrubbing etc.
5. Provide minimum set of information which will be put on DLT system for sharing with different Entities and in between TSPs.



Section III: Appointment of Entities/ Registrars

1. The Access Provider, at its sole discretion, may choose to perform the functions of Entity by its own or may also choose to delegate the same to a third party or may choose multiple third parties to perform different activities or may choose multiple third parties for an individual activity
 - a. Access Provider shall ensure proper authorization of such Legal entity through legal agreements, which shall include strict conditions for safety, security and confidentiality of the information being made available over the DLT system.
2. Entity Registration Functionality:
 - (1) All entities with associated functions, who will be carrying out given functions for effective control of Unsolicited Commercial Communications being delivered through them, shall be declared by each Access Provider on DLT. once they are registered;
 - (2) any legal entity may carry out one or more functions while keeping all records and execution of functions separately against each activity for internal audit by the access provider to ensure the effectiveness of Unsolicited Commercial Communications control to meet regulatory outcomes specified in the regulations;
 - (3) each functional entity shall be given unique identity by the access provider(s) to be used to authenticate and track the events;
3. Every Access Provider shall formulate structure and format for headers to be assigned for the purpose of commercial communications via sending SMS for Promotional SMS and Non Promotional (Transactional &Service SMS)
 - a. Three types of entities may register & get allocated with a Unique ID post registration namely Principal Entity, , Telemarketer, Aggregator.
 - b. Only legal entities/ organizations can register as an “Entity” at DLT.
 - c. Details such as Organization name, Industry Category (Govt/ Private Ltd/ Public Ltd/ SEBI/ Others), PAN or TAN, Address, authorization letter are mandatory at the time of registration which get updated at DLT.
 - d. Entity Registrar can accept and approve all secondary entity registration requests even for the cases where Entity name, address, PAN and Industry type, etc. are not matching with DLT
 - a. If the necessary documents are shared along with declaration letter from respective entity on company’s letter head with Sign, seal and stamp from authorized person.
 - e. Certificate will be issued with the name as approved by the Registrar.
 - f. For any secondary registrations, both Entity and Headers, responsibility purely lies with Primary creator and no action to be initiated by secondary Operator.



- g. Only the above information filled in by the entity at the time of initial registration with the access provider who becomes his Creator operator are updated on DLT.
- h. Any modifications to the above information at DLT has to be initiated by the entity with his creator operator.
- i. During registration, entity has to upload his PAN / TAN document, proof of address & authorization letter which is further validated by the Entity-Registrar of the operator.
- j. Proof of Identification (as agreed between all operators) is the PAN / TAN & this is unique for an entity & his entity class (PE/TM/TA) across DLT.
- k. Validation through OTP on both mobile number & email id is done by the TSP during the registration.
- l. In case of any issues observed during the registration validation by the Entity registrar, the request may be rejected which is duly communicated to the entity with reasons
- m. The validation is same for entities across Industry categories & Entity class, except for Government Entities & SEBI registered brokers.
- n. Exceptional approvals may be granted for Government entities basis the Authorization letter shared by the entity in their office stationery or on the provision of GST document which has the PAN or TAN number in the GSTN.
- o. SEBI registration certificate is to be uploaded for the broker entities registering under SEBI industry category.
- p. Entities are communicated on the registered mail Id post validation by the TSP on both successful & unsuccessful registration.

Section IV: Types of Entities Registration and their functions:

There are seven types of Entities which are to be appointed by a TSP, either to be done within its organization or for delegation to a third party, for performing the functions as per TRAI TCCCP Regulation, 2018. The functions and process steps to be followed by such Entities are given as follows:

- 1. Entity Registrar - Points to be added;**
- 2. Header Registrar (Entity - HR)**

Broad Functions:

1. Assign header via Header Registration Functionality, on its own as per allocation and assignment principles and policies, to facilitate principal entity to get new headers;
2. Carry out pre-verifications of documents and credentials submitted by an, business entity or legal entity requesting for assigning of the header during Entity registration;



4. Carry out additional authentications in case of a request for headers to be issued to SEBI registered brokers or other entities specified by Authority by directions, orders or instructions issued from time to time;
5. Carry out additional authentications in case of a request for headers to be issued for well-known brands;
6. Carry out additional checks for look-alike headers which may mislead a common recipient of commercial communication, it may also include proximity checks to well-known brands while assigning headers irrespective of current assignments of such headers, and to follow specific directions, orders or instructions, if any, issued from time to time by the Authority;
 - a. maintain header register, in a secure and safe manner, and make accessible relevant information for identifying the assignee at the time of request
 - b. carry out Header Registration Function;
 - c. manage record of headers i.e. free for assignment, assigned to an entity;
 - d. synchronize records, in real time, among all header ledgers available with participating nodes in Header Registration Functionality in an immutable and non-repudiable manner.

A. Process steps to be followed:

- a. assign header for SMS via Header Registration Functionality, on its own as per allocation and assignment principles and policies, to facilitate content provider or principal entity to get new headers;

Process for Allocation and Assignment Principles and policies:

Categories of Header Assignment

UCC category	Short code
Banking/ Insurance/ Financial products/ credit cards	1
Real Estate	2
Education	3
Health	4
Consumer goods and automobiles	5
Communication/ Broadcasting/ Entertainment/ IT	6
Tourism and Leisure	7
Food and Beverages	8



- i. No absolute right or ownership of Sender on the header(s). In case of any dispute or otherwise, under pure discretion of the TSP, the assignment of header(s) can be revoked, with or without notice. TSPs under its discretion, can disallow allocation of any specific headers as well.
- ii. The assignment of header(s) will as per commercial terms prescribed by respective TSP.

Process for Pre-verification Checks and request for assignment of SMS header:

- i. Only the PE can raise request for headers. Basis the table above, they will mention the header name & whether Promotional or Service/ Transactional.
 - ii. The entity has to select the “Category” defined in the above table while requesting for the header.
 - iii. Check that the header(s) should be related to company name or initial alphabets of the words in the company name the brand name such Sender holds.
- b. bind with mobile number(s), in a secure and safe manner, which shall be used subsequently on regular intervals for logins to the sessions by the header assignee;
- c. carry out additional authentications in case of a request for headers to be issued to SEBI registered brokers or other entities specified by Authority by directions, orders or instructions issued from time to time;

Process for Additional Authentications - SEBI related: The Sender should be a SEBI registered investment advisor or broker or sub broker or portfolio manager or merchant banker and should provide its SEBI registration document.

- d. carry out additional authentications in case of a request for headers to be issued to or well-known brands, including specific directions, orders or instructions, if any, issued from time to time by the Authority;
- e. carry out additional checks for look-alike headers which may mislead to a common recipient of commercial communication, it may also include proximity checks, well-known brands while assigning headers irrespective of current assignments of such headers, and to follow specific directions, orders or instructions, if any, issued from time to time by the Authority;



Process steps for Additional checks for look-alike headers:

- i. When a header request is raised, it is first validated against the entity's name along with its brand, goods & services dealt by him.
- ii. It is also checked whether the same has any resemblance to well-known / popular brand or company or Government activities etc to the best of the Entity-HR's knowledge in the absence of a defined/ available list for the same
- iii. If there is no striking resemblance the header may be approved if the relation or connection can be established with the entity's name, brand, products or services through the justification provided/ valid documents shared such as TM certificate, FSSAI certificate, website link etc
- iv. If there is a striking resemblance to any well-known / popular brand or company or Government authority – the requested is rejected & reason for the same communicated to the entity.
- v. If, despite all best efforts as above, a header is allocated to an entity, and the Bonafide entity approaches the TSP later for the header or for preventing the other entity from using it, the TSP may withdraw or re-allocate the header. This to be provided in the standard agreement.

Process steps for Registration of Sender and/or Header: Post successful checks and documents availability as per above, the Entity-HR will register the Sender and/or assign the header and make respective entries in the system. Despite the above checks & balances at the Header registrar end, if duplicate or look alike headers get created, such cases are treated as exceptions & settled b/w TSPs.

Process steps for De-registration of Sender and/or Header:

- i. In case of repeated complaints as defined in the complaint handling CoP.
 - ii. In case limited period mentioned in the Authorisation letter provided by Government agency or Corporate/well-known brand.
 - iii. On direction from LEAs, Regulators or other competent authorities
 - iv. Any other scenarios, as defined by TSP from time to time.
- f. Such de-registration/blacklisting of Sender or Header(s) should be immediately informed to the respective Sender on their registered email id, along with process of re-allotment as defined by TSP from time to time.
- g. Above process steps as defined from sub-point a) to h) are to be followed in case a Sender or Telemarketer seeks allocation of telecom resource for voice calls, except the provisions which are specific to SMS as a bearer.



Process for Voice Header Allocation

Allocation of 140 Series Voice Header to Telemarketer (For Promotional Calls)

- Entity must register as a Telemarketer (TM) on the DLT platform and get the TM Certificate to acquire a header (140xx) for promotional communication.
- TM can request TSP to get the voice header for promotional calls by submitting TM certificate.
- 140XX series is used for voice promotional communication.
- Following steps are involved in Initiating Voice Header Registration by TM
 - TM logs in to the portal and Navigate to Header -> Voice Header registration
 - Provide PE ID, Header and TM remarks and submit the request.
 - CLI, TM & PE combination will be unique.
 - Only for Active PE's and TSP registered PE's the request is accepted.
 - On successful submission, a Unique request number (URN) will be generated for this request.
 - The summary of the submission is seen in Voice Header summary page for TM.
 - In case of VNO/Platform service provider, TM resources are allocated to VNO/Platform Service provider, who can request TTL (as registrar) to initiate header registration on DLT platform with necessary CRM platform access.
 - In cases where a VNO or Aggregator intends to onboard its associated Principal Entities/Telemarketers onto the TTL DLT platform and permits TTL (as the registrar) to access their CRM/systems for validation, TTL extends support to ensure smooth and effective operations w.r.t to registration and complaint management. This includes helping the VNO/Aggregator maintain compliance with regulatory requirements

Voice Header Acceptance by PE

- Entity must register as a Principal Entity (PE) on the DLT platform to acquire a header (140xx) for promotional communication.
- Following steps are involved in Voice Header Registration by PE
 - PE logs on to the portal and Navigate to Header -> Voice Header Registration Summary.
 - The Voice Header Summary page will open with all the pending requests.
 - Click on the corresponding header, it will route to voice header registration for PE.
 - Industry category and sector provided during PE registration will be displayed.
 - PE selects the header category and uploads the category document.
 - PE adds his remarks and submits the voice Header registration request to registrar for approval.
 - Last action will be updated as 'Approved by PE' and Last action date will be updated with current date
- Similar to promotional voice header registration process, PE can initiate registration request for Voice service and transactional header by selecting the TM details and TM accepts the request



Allocation of 1600 Series to PE/Sender

- As per extant provisions, 1600 series has been allocated exclusively for service/transactional calls for BFSI and Government Entities.
- Accordingly, 1600 header to be allocated only to respective PEs for service/transactional calls.

Voice Header approval

- Following steps are involved in Voice Header Approval by TSP/ACCESS PROVIDER
 - TSP/ACCESS PROVIDER will login to the portal and Navigate to Header -> Voice Header Worklist Summary.
 - Voice Header Worklist Summary page will open with all the pending requests.
 - On click of URN, the page routes to Voice header registration Approval Page
 - Header registrar validates by
 - Checking the availability of 140xx Number in CRM database
 - Industry category of PE
 - Upon Successful validation, the request is approved by TTL.
 - Activation Date is updated with current date
 - In case, if the provided information is insufficient, Registrar will select the respective party (PE/TM) at which end there is a gap and select the appropriate reason to send back for modification.
 - All voice headers can be viewed in the reports section.

Resubmission of Header request by PE/TM

- Respective party needs to correct the deficiency and resubmit the request for approval.
- If the status is Pending with TM, then TM navigates to voice header summary page, click on URN and route to Voice header Modification for TM
- TM acts accordingly to the registrar's comments and submits the request.
- If the status is Pending with PE, then PE navigate to voice header summary page, click on URN and route to Voice header Modification for PE
- PE acts accordingly to the registrar's comments and submits the request.
- Upon Submission, the Header Registrar will re-validate the request and takes necessary action.

Suspension Rights to TM

- TM to Navigate to Voice header summary page and click on SUSPEND button.
- A popup will appear to choose Permanently or Temporarily disable header.
- Only for temporarily disabled headers, option will be given to reactivate them.
- If the reactivation has to be done for permanent deactivation, the header registration process needs to be reinitiated.
- The entity who suspended the header can only reactivate it by clicking REACTIVATE Button on the Summary page.



- During this time PE will not be allowed to make calls using respective header
- If the header is permanently suspended, then linkage between TM and PE will be removed, but the header would remain with TM and can be allocated to other or same PE later.

Suspension Status

- Disabled by TM/PE – Temporary status, will have binding in system between same PE and TM.
- Removed by TM/PE – Permanent status, this removes the linkage and moves the header to free pool of TM, however it can be relinked by the respective party with same PE/TM if required. Reconfirmation will be alerted to TM /PE accordingly

Suspension Rights to PE

- PE to Navigate to Voice header summary page and click on SUSPEND button.
- PE to choose Permanently or Temporarily disable header.
- Only for temporarily disabled headers, option will be given to reactivate them.
- If the header is permanently suspended, remove the linkage of TM and PE with headers and move to freepool.
- The entity who suspended the header can only reactivate it by clicking REACTIVATE Button on the Summary page.
- When a PE initiates Suspension/reactivation, TM to receive a mail notice and the action will get captured in DLT with the date and time stamp.
During this time TM will not be allowed to make calls using the respective header for that PE.

Reallocation

- New header allocation Process is considered to Reallocate the Number to new PE by TM after 1 day of cooling period

h. **Process Steps in case Header already allocated:** There could be following scenarios:

- i. In case, a header is already allocated to an entity and a different, seemingly Bonafide entity approaches the TSP/ACCESS PROVIDER later for the header or for preventing the other entity from using it, TSP/ACCESS PROVIDER may withdraw or re-allocate the header.
- ii. In case, two entities at one point of time seek a particular header. TSP/ACCESS PROVIDER have a guiding framework to resolve such issues, on case to case basis.



SMS Header Delinking Process

- i. Principal Entity to reach out to Access Provider customer Care and register their concern on the unavailability of Header. (TSPs may provide their email for the entire process)

Access Provider Customer Care to do preliminary validation of the claim such as if the requested header is created & registered by TSP/ACCESS PROVIDER or other TSP. If Other TSP than the customer to be informed to be taken up the respective TSP. Cases to considered:

- ✓ TSP/ACCESS PROVIDER Donor and TSP/ACCESS PROVIDER Recipient.
- ✓ TSP/ACCESS PROVIDER Donor and Other TSP Recipient.

In case the header is created & registered with TSP/ACCESS PROVIDER, then claim to be verified like if the header name is a subset of the company name or its brand or registered trademark with related documents received. If no match observed than the request would be denied.

If connection between the entity & the header can be established, then the request would be taken, and separate communication would be sent to the original entity (Donor Entity) for Header release.

If original Entity (Donor Entity) agrees to release the Header and gives consent, then Transfer of ownership request to be raised by Customer Care .

On release of Header in free pool post Header is deleted from Donor Entity, Recipient Entity to raise request for Header (Follow same process of Header Registration).

Incase Donor Entity is of other Operator, Principal Entity has to approach Other Operator to get the header released.

For look like Headers allotted to different Principal Entities, on release from one entity , header will get inactivated for that entity and will not move to free pool.

Consent Template Registrar (Entity-CSTR) and Consent Registrar (Entity-CR)

1. As per TRAI Direction dated 13.06.2025, a Pilot has been conducted by the TSPs for the Consent Registration Function (CRF) framework with a few RBI regulated banks.
2. The process of recording consents will be inserted here as per successful completion of the Pilot and subsequent Commercial Go Live. Till such time, the process of obtaining consents in line with TCCCPR 2010 shall remain applicable.



3. Content Template Registrar

A. Broad Functions:

- a) Content Template Registrar (Entity-CTR) to carry out content template registration function;
- b) keep records of registered templates in immutable and non-repudiable manner;
- c) maintain with minimum performance requirements as specified;
- d) perform any other function and keep relevant details required for carrying out pre and post checks for regulatory compliance;

B. Process Steps to be followed:

- a) **to check content of the template being offered for registration as a Transactional template , service message template and Promotional templates ;**

Process Steps for checking Content offered for registration: SMS Content Template

- i. Sender will share with Entity-CTR the proposed template to be registered under the category of transactional or service message.. The template should carry both fixed and variable portion, distinctly identified. Sample Templates with fixed and variable portions will be prescribed and shared with senders during Registration. All variable portions will be tagged under pre-defined labels.
- ii. Sender to ensure not to send any objectionable, obscene, unauthorized or any other content, messages or communications infringing copyright and intellectual property right etc., in any form, which is not permitted as per established laws of the country. TSPs' to be indemnified for any such misuse by sender/aggregator through relevant clause in the agreement.

Entity-CTR to check the content of the service message templates and transactional message templates submitted by the sender

- iii. TSPs under its discretion, can disallow registration or cause deregistration of any content template based on any specific keywords or otherwise.



- iv. Header not mandate to be registered with all the Access provider, Header registered with other TSP will also be allowed for Content template registration,
- a) to identify fixed and variable portion(s) of the content in the offered transactional template, service message and promotional message template with identification of type of content for each portion of variable part of the content, e.g. alpha numeric, numeric, callback, URL , email .
- b) URLs/APKs/OTT links/Call back numbers to be whitelisted before running the SMS campaign to ensure no scrubbing failures
- c) PE TM chain to be declared by PE in DLT for SMS
- d) All Variables in Content Template to be Pre-Tagged as Text, , Number, URL, Call back number, email.

Voice Content Template

- a. Principal Entity (Sender) to register Voice Template and declare the purpose of call.
- b. Entity to declare the mode of Voice call and provide declaration for Auto dialer/Robo calls while registering the voice template.
- c. Entity -Content Template Registrar (CTR) to verify the template.

Telemarketer for Various Functions

Note: Scrubbing and Delivery function are not provided independent. Scrubbing is performed as part of Delivery function.

1. Broad Functions:

- a) carry out scrubbing;
- b) keep record of all numbers scrubbed for complaints resolution;
- c) maintain with minimum performance requirements as specified;
- d) perform any other function and keep relevant details required for carrying out pre and post checks for regulatory compliance;



2. Process Steps to be followed:

- a) For SMS - to process scrubbing as defined, in a secure and safe manner, using header, template, CTA, variable values, PE-TM chain, preferences and consent of customer(s) and category of content; -
- b) For Voice - to process scrubbing as defined, in a secure and safe manner, using header, preferences and consent of customer(s) and category of content;
- c) provide details about preferred time slots and types of days for delivery;

Process Steps for processing Scrubbing:

- i. Scrubbing function can be for either category of commercial communication i.e. promotional, and service.
- ii. The Scrubbing function would mean checking of customer's Del number against registered preference or consent, depending upon the message type being promotional.
- iii. The Telemarketer or Sender through OAP, will provide the MSISDNs and content of message along with the category of content (i.e. promotional or service) to the TM-SF as per the format prescribed by the DL/TM-SF.
- iv. take necessary measures to protect Preference Register and Consent Register data during scrubbing,

Process Steps for Protection of Data during scrubbing:

6(b) Telemarketers for Delivery Function (TM-DF) of communication with telecom resource connectivity to OAP:

A. Broad Function:

- a) carry out delivery function
- b) authenticate source of the communication submitted for delivery by header assignee or by aggregator and ensure their identity is part of content of communication for traceability;
- c) maintain with minimum performance requirements as specified;



- d) If any PE initiates a PE-TM chain, then the TM-AF has to accept and define the TM-DF to complete the chain, then the PE will do the final approval of the PE-TM chain. TM-AF cannot add another TM-AF in the PE-TM chain, as only one TM-AF and one TM-DF is allowed in the PE-TM chain.
- e) perform any other function and keep other relevant details which may be required for carrying out pre and post checks for regulatory compliance;

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 or show cause notice or penalty or temporary/permanent termination etc.
- 2. TSP may formulate an internal process on above.

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

Following information should be handed over by a TSP to all other TSPs:

- 1. Sender
 - a. Sender ID
 - b. Header
 - c. Sender Name and Address
- 2. Header
 - a. Header
 - b. Date-Time of registration
 - c. Purpose (Transactional, Service, Promotional or Government)
 - d. Linked Telemarketer
- 3. Consent Register (Functionality not available) – To be updated post CRF Go Live
 - a) Customer Number
 - b) Date/time of OTP message generation



- c) Date/time of OTP validation and consent recording
- d) PE
- e) LOB/Brand
- f) Validity of consent, if any

4. Content Template

- a) Sender ID
- b) SMS header
- c) Consent Template registration unique number
- d) Content Template
- e) Fixed portion and Variable portion

5. PE-TM Chain

Section VIII. Amendment to CoP

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 IX. Publication of CoP

This CoP may be published by TSP/ACCESS PROVIDER on its website after the implementation of the new systems and processes.

Further, on any amendment to the CoP, same may be updated by TSP/ACCESS PROVIDER over its website.

Section X. Definitions

The definitions would be as per the definitions contained in TRAI's TCCCP Regulations, 2018.



Section XI. Version History

Sr. No	Version Number	Date of Submission to TRAI	Effective Date of CoP	Main/Amendment Number
1	TTL_CoP_Entities 1.0	10 th October 2018	As per clause mentioned in CoP	Main
2.	TTL_CoP_Entities 1.0	31 st Jan 2019	As per clause mentioned in CoP	Amendment
3.	TTL_CoP Entities 2.0	15 th Jan 2021	As per clause mentioned in CoP	Amendment
4	TTL CoP Entities 3.0	5 th Nov 2024	As per clause mentioned in CoP	Amendment
5	TTL CoP Entities 4.0	01.08.2025	As per clause mentioned in CoP	Amendment
6	TTL CoP Entities 5.0	28.02.2026	As per clause mentioned in CoP	Amendment