Subject: **Fwd: Idea Cellular Response to TRAI CP on "Unsolicited Commericial**   Date: 11/10/17 09:29 AM
Communication"
To: Rajender Kumar Sharma <rajender@trai.gov.in>

From: "Asit Kadayan, Advisor" <advqos@trai.gov.in>

Annexure A - Idea Response- CP TCCCP Regulation_Fi... (439kB)

-------- Original Message --------
From: **Gagandeep Bajaj** <gagandeep.bajaj@idea.adityabirla.com>
Date: Nov 10, 2017 12:29:48 AM
Subject: Idea Cellular Response to TRAI CP on "Unsolicited Commericial Communication"
To: "advqos@trai.gov.in" <advqos@trai.gov.in>
Cc: Rahul Vatts <rahul.vatts@idea.adityabirla.com>, Gagandeep Bajaj <gagandeep.bajaj@idea.adityabirla.com>

The Secretary,
Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi - 110 002

Kind Attention: Advisor (QoS)

Sub. : Consultation Paper on "Unsolicited Commercial Communications" dated 14.09.2017

Sir,

The Authority is already aware of the extreme financial stress prevailing in the telecom Industry with almost all operators incurring losses on the investments made. Infact, so grim is the situation that the Industry has for the first time ever, registered a revenue drop for the full financial year, the AGR of the Industry having declined to INR 1,404bn for FY17 with a YoY decline of 4.9%, while the AGR for Q1FY18 having declined to INR 283bn with a YoY decline of 27%. Thus the Indian Telecom Industry, that has already invested over INR 9.2 lakh crores in setting up world class mobile networks over the last 20 years is currently going through one of its most disruptive phases, and reeling under a heavy debt burden of over INR 4.6 Lakh Crores.

Against that background, we feel that it is extremely critical that the Authority commit itself to undertaking a cost benefit analysis before coming up with any new Regulation on Unsolicited Commercial Communications (UCC) towards which the TSPs have already made significant investments in the past. Infact we would also urge that going forward each Public Consultation / Regulation issued by the Authority be accompanied with a regulatory impact assessment (RIA). Globally, RIA is a process of systematically identifying and assessing the expected effects of regulatory proposals, using a consistent analytical method, such as benefit/cost analysis, and its most important contribution to regulatory quality lies in its impact on policy-makers' approaches to policy decision-making. RIA therefore has the capacity to provide real benefits from the early stages of its implementation, provided that it is adopted in a consistent and systematic way. The experience in various jurisdictions, such as the United States and European Union member states also clearly shows that Regulatory Impact Assessment (RIA) is one of the best analytical instruments permitting to identify the results of the planned action and to give them a direction that ensures the best quality and efficiency of the law.

That said, we would also like to urge the Authority to discontinue the practice of levying financial disincentive on access providers. This is because 80% of UCC related complaints are on account of promotions carried out on voice calling by Unregistered Telemarketers, the identification and elimination of which is practically not possible. However, the TSPs still continue to make best efforts towards mitigation of such occurrences through closely monitoring calls pattern, location, etc. to identify Unregistered Telemarketer activities and take immediate corrective actions. Such efforts have already brought down incidences of UCC related complaints considerably.

Against the above background, please find attached herewith our submission as Annexure A.

Should the Authority require any clarifications or further information on the positions set out in this response, please do not hesitate to contact us.

Thanking You,
For IDEA Cellular Limited

Gagan Deep Bajaj
Senior General Manager – Regulatory & Corporate Affairs

Annexure A

The Authority is already aware of the extreme financial stress prevailing in the telecom Industry with almost all operators incurring losses on the investments made. Infact, so grim is the situation that the Industry has for the first time ever, registered a revenue drop for the full financial year, the AGR of the Industry having declined to INR 1,404bn for FY17 with a YoY decline of 4.9%, while the AGR for Q1FY18 having declined to INR 283bn with a YoY decline of 27%. Thus the Indian Telecom Industry, that has already invested over INR 9.2 lakh crores in setting up world class mobile networks over the last 20 years is currently going through one of its most disruptive phases, and reeling under a heavy debt burden of over INR 4.6 Lakh Crores.

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Against the above background, we now proceed to making our submissions on the various queries raised in the Consultation Paper.

RESPONSE TO QUERIES

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.

Idea Response:

- The existing process where the upload of incremental files is performed twice in a week, is itself a very stringent task and hence further squeezing the TAT would have adverse impact on the processing of request & scrubbing.

- Currently, we have rarely come across any complaint where RTM has sent promotional communication to any DND subscriber, which means that most of the TM's are ensuring the scrubbing. The recommendation in CP of providing scrubbing as a service would involve additional cost & thus we recommend with the existing process only.

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.

Idea Response:

- While we understand the authority's concern on overall DND process, we don't expect consumers to use Apps specific for each concern. It is imperative to note complaints like network/coverage, billing etc. are larger in number than DND hence specific app to handle DND registration, de-registration,

preference change & complaint management is not required, otherwise we will have to have APP for each consumer concern.

- Further, as Idea Cellular we already have offered options for registration, deregistration, preference change & complaint management to our customers through our existing MY Idea App. Adding another App, as recommended by the Authority, will only be duplication even if it is bundled or kept separate as another APP specific to DND.

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

Idea Response:

- We support continuation of the customer's earlier DND status even after porting. In order to achieve this, it would be best to eliminate any de-registration and/or registration process. The Recipient operator should update its PCPR database basis NCPR database for the ported customer.

- Further, any manual work such as ticking the preference options during the porting process is likely to lead to inadvertent errors, i.e., the preference may change during porting.

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.

Idea Response:

- The process of registration irrespective of individual or bulk, will require to be actioned against each mobile number, hence even if bulk registration request from authorized signatory is received it needs to be updated against each mobile number mentioned in the letter, manually.

- Additionally, it may be noted that this action would have to be done manually based on the physical request which might lead to inadvertent errors.

- We recommend that the freedom to exercise DND should be left to each individual on his / her own and hence the registration process should be continued as it is without any changes.

Q. 5. Is there a need to have more granularity in the choices to actually capture customer's 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.

Idea Response:

- We support more granularity in the choices for customer, such as type of day, media type, etc. so that the customer gets more choice & importance.

- However, at the same time, we strongly recommend that the Authority do a cost benefit impact analysis before finalization.

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.

Idea Response:

- Our comments against each of the call types is as follows:

  a) Silent Calls – We have checked with our technical team and found that it is not possible to capture the silent call (missed call) logs. Thus taking actions without the proof will not be prudent.

  b) Obnoxious & Threatening Calls – These type of calls are very subjective and open to mis-interpretation and possible misuse. Such calls may be very serious in nature and hence rather putting them into the DND domain, it is better to put them into the Legal domain.

- As regards the Government role, we feel that the Government should constitute strict laws to mitigate such unwanted communications while simultaneously creating conditions conducive for customers to lodge complaints with local LEA's easily.

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.

Idea Response:

- We have checked with our technical team and found that it is not possible to proactively identify silent calls (missed call) & robo-calls.

- In case of robo-calls there would be a need to identify entire CDR where one will need to look if the same number has originated the number of calls at a same time. However, this will lead to exposing all CDR's for manual validation which could be potential breach of privacy.

- Also identification of such numbers on daily basis will require huge efforts and it will be difficult to get the output on regularly.

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.

Idea Response:

The current registration process is very stable and hence we do not recommend any further change in the current regulation prescribed by the authority.

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.

Idea Response:

- Yes, we recommend that there should be registration of principal entities such as Aggregators. Once the aggregators are registered, there should not be any additional obligation for the content providers to also register.

- The TM's and the content provider should get into an agreement and the same should be uploaded by the TM on the NCPR portal on the same lines as the current practice adopted by TSPs to upload their TM Agreements.

- Also the details of the CLI's used for the content sent on behalf of that entity should be uploaded on the portal. This will also enable better clarity for faster resolution of customer related issues, if any.

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.

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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.

Idea Response:

- We agree that new systems are required to be established for the purpose of header registration, execution and management of contract agreements among entities. However, recording of consent / uploading of consent taken by TMSEs may lead to issues such as compromise on privacy / commercial

secrets while registration of content template may lead to the issue of time delays, etc. Hence, these are not recommended.

- Further, it is recommended that the portal should be established, operated & maintained by TRAI.

- We recommend the following format –
  <Name of entity> - <operator><operator code><unique 3 digit TM code given>

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

Idea Response:

- We feel that Scrubbing as a service model may be useful for securing NCPR data. However impact on the overall cost of communication needs to be kept in consideration before introducing such a service model. This is because any increase in cost would most likely lead to a spurt in the activities of URTM (un-registered Tele Marketers).

- It is also pertinent to mention here that that as per the existing trend of complaints we get very few complaints in case of promotions done through RTMs. This indicates that the existing guidelines are stringently followed by the TM & Service providers.

- In case of the queries made by individuals / subscribers, we recommend that an OTP based authentication should be introduced. However in the case of TSP's, a login based query system should be allowed as the same will be helpful during complaint handling

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.

Idea Response:

- As already submitted under our response to Q. 10, we have recommended the need for new systems for the purpose of header registration, execution and management of contract agreements among entities. We have also recommended the following header format –
  <Name of entity> - <operator><operator code><unique 3 digit TM code given>.

- Further, it is recommended that login based options to the NTR system be offered to RTMs. Here, the RTM would be required to define the operator through which it intends to push the promotions & to also feed in the 3 preferred header names meeting with the principal entities specifications. Once the above is done, the system should have the capability to allocate online a unique header / suggested header.

- We recommend DSAs & agent level scrutiny is not required as the responsibility of adherence is upto RTM level.

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.

Idea Response:

- Kindly refer to our response against Q.10 above. The header format has already been suggested in our response to Q.10.

- We do not recommend application of any charges as it is likely to result in increased cost of communication which might have an adverse impact on the industry. The Authority may consider the impact before taking any decision on the fees.
  .

Q. 15. Whether voice calls should be permitted to TMSEs and how these can be identified by the customers? 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.

Idea Response:-

- We don't recommend permitting voice calls to TMSEs as this will lead to complaints regarding usage of transaction pipe for promotions.

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?

Idea Response:

- It has been seen that many customers despite having signed up under DND category are interested to receive details of offers from select entities with which they regularly carry out transactions. For E.g., A customer who regularly buys from a XYZ retail chain / service provider would be interested to receive alerts from that chain, but would not be interested in getting details of offers from an ABC retail chain / service provider. Such customers also regularly sign up for alerts with the chain / service provider they do business with / transactions with.

- However, the way the Regulation is structured currently, the customer would if he wishes to receive offers from the retail chain / service provider he regularly does business with / transacts with, need to partially unblock himself from DND categorization in favour of receiving alerts for that particular category. However, once he does that, he might thereafter end up getting promotional messages from both ABC and XYZ despite wanting to have them only from XYZ.

- Against the above background, we would like to recommend relaxation of the definition of transactional messages to include communications and offers from opted-in entities as regards their products and offers. Such a move will allow customers to greatly benefit by getting alerts and updates

on offers from the Brands they regularly transact with / do business with, and with which they have already registered to receive periodic alerts and updates.

- Having said that, in case the Authority is unable to consider our above proposal despite the inherent customer related benefits, we would recommend the following for ensuring the sanctity of transactional messages, as they stand defined in the Regulations currently.

    i.   It is suggested that routing of transactional SMS (A2P) on anti-spam filtration which is currently used for UTM. However, the Authority needs to keep in consideration the fact that development of such a capability would require huge efforts i.e. cost wise, technical capability study etc.

    ii. We also suggest that the Authority develop a list of various Government and Semi-Government bodies which are currently sending message or may intend to send messages in future. Such listing will help in keeping their messages out of the purview of spam solution.

    iii. We also recommend that scripts of spam be maintained centrally with the authority from where they could be made accessible to all the operators

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.

Idea Response:

- Currently, we have 7 days TAT in total (3 days for OSP & 3 days for TSP & one day for close looping) There is scope of squeezing the TAT by 1 days each side (excluding Saturday & Sunday), the 2 days are required for proper validation of CRD's, as a customer data privacy the CRD access is available only with Nodal officer of circle. Moreover, at time we also have to co-ordinate with TM for locating the log.

- Further, Semi -Automation is already in place for complaints received from Website, APP, TRAI APP, SMS, etc. where Tagging in CRM happens automatically. However other source like complaints from

other SP & touch point are manual. We cannot automate the complaint part completely since there is a need for validation.

Q. 18. How the medium of Customer 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.

Idea Response:

- All source of CCRF are effective, however mobile app & web portal are more convenient in comparison to other sources like calling up the call center or compliant via SMS.

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.

Idea Response:

- It is recommended that non-registered customer complaints should not be entertained. We are already proactively doing analysis & identify the UTM & taking actions against them.

- Secondly, for fraudulent type of message or calls, legal involvement would be required & hence the same should be suggested for police complaint.

- While customer is in roaming or his call is forwarded, currently we do not have any such capability to terminate the call and this would need huge set-up of Opex & Capex which would be very time consuming as well. Going by the current industry situation it is not recommended to explore this option.

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.

Idea Response:

- The existing TRAI APP is working fine and is also well integrated with our CRM.

- However we welcome any further development or enhancement in the mobile APP.

- Mandating device manufactures to provide information of the mobile app developed by TRAI should be taken up by the authority itself.

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.

Idea Response:

- It is critical that the financial disincentive levied on access providers for UCC should be done away with completely. This is because TSPs have been constantly making best efforts to mitigate UCC in the interest of their customers.

- However, should that not be possible, atleast the financial disincentive imposed on Access Service providers on account of UTM should be done away with. This is because the Authority is also aware that 80% of complaints related to UTM are on account of voice promotions, the detection and elimination of which is beyond our capability.

- Having said that, the Access Service providers make multiple efforts in terms of analyzing calling patterns, their locations and use the results to regularly identify prospective UTM and disconnect

defaulting connections. For SMSs, the TSPs have installed spamming solutions and regularly update scripts in the same for best results.

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.

Idea Response:

- There should not be any financial disincentives on robocall, auto-dialer calls for UCC on service provider because they are beyond the capability to be identified.

- In case of any complaints received from subscribers, the service providers can advise the customers to approach police for legal action. Such complaints would also be tagged and action taken / resources disconnected, as per the existing process.

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.

Idea Response:

- Currently all the service provider are having their own signature solutions.

- If a script is blocked in one operator, there is always a possibility that the UTM may start sending SMS from other operator,

- It is recommended to have a utility with authority where all the signature/scripts are collated in this central utility, and a mirror copy is shared / replicated for all the operators twice in a week.

- Lastly, we suggest that the cap be reduced from 200 per hour to 100 per hour.

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.

Idea Response:

- Solutions of AI can be used to improve the performance of signature solutions.

- An artificially intelligent Bot can be programmed that can be used to keep the Telemarketers on the line for as long as possible to learn new patterns.

- This new patterns can be shared with the various operators for necessary implementation in their signature solution.

- However, we believe that implementation of any AI solution would need detailed deliberations between all stake holders.

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.

Idea Response:

- Honeypots which are dummy numbers can be created by the access providers in their network to capture any messages or calls from UTM and can be used to identify and initiate proper action against them.

- There is a likelihood that messages or calls from UTMs might land on honeypots and the data collected may be used for identifying UTMs and taking action against them.

- However this also needs detailed discussion between all the stake holders.

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.

Idea Response:

- We feel that the contours of any such solution that uses intelligence from crowd sourcing need detailed discussions between various stakeholders, as there are various factors and associated conditions that would need to be understood before any view can be given / taken.

- We recommend that the Authority initiate a separate discussion with the stakeholders after sharing all relevant details.

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.

Idea Response:

- We do not see the possibility of much complexity coming in from the introduction of additional categories, sub-categories and preferences.

- Providing scrubbing as a service model will definitely help in simplifying the process of RTMs since the scrubbing will now be real time.

- We recommend that only mobile number details should get uploaded and the downloaded file should highlight the numbers that are not under DND.

- Below is the recommended process steps –

Step 1 – RTM will Login to NCCP portal with their credential.

Step 2 - Upload a file on NCCP portal bearing all the mobile numbers to whom promotion is to be made.

Step 3 – With the reference number, the output file with preference number is downloaded by RTM.

Step 4 – While pushing promotion the RTM updates the reference number received from NCCP. This should be mandatory.

- Further, we recommend RTMs should be charged minimal for the scrubbing service.

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.

Idea Response:

- At the outset, we recommend that scripts of spam be maintained centrally with the authority from where they could be made accessible to all the operators. Thus is likely to prove very helpful as a first step to eliminate instances of victimization.

- Below is the recommended mechanism which can be used to avoid further possibilities of victimization:
  i.   For any UTM related complaint, there should be a 2 level validation before taking any action.
        a. CDR validation
        b. Usage validation

        Here if the CDR validation turns out to be positive, a second level check may be done on the usage level. For E.g., whether the originating number has made > 20 calls/SMS per hour, whether the

location is same for originating these calls, etc. However due diligence would be required before reaching to a conclusion.

ii.   If validation yields positive results, it should be followed with a SMS based notice for the first such instance & disconnection should be initiated only after receipt of the second complaint of same nature.

iii. There should be a provision for such an originating subscriber to approach TRAI in case his /her number suffers disconnection. Subsequently, the Authority can take a decision.

iv.   The blacklisting period be reduced from 2 yrs to 1 yr.

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.

Idea Response:

- Please refer to our response in Q.23 where we have already given an elaborate spam / signature solution.

- The authority may also recommend common rules for scoring of all TSPs in case of the present signature filtrations.