



QTL/Reg/TRAI/1711/511
November 10, 2017

Sh. Asit Kadayan
Advisor (QoS)

Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
Old Minto Road, New Delhi-110002

Subject: Response to Consultation Paper on Unsolicited Commercial Communication.

Ref: TRAI Consultation Paper dated 14.09.2017

Dear Sir

This is with reference to your kind office consultation paper dated 14.09.2017 on Unsolicited Commercial Communication.

In view of the above consultation paper, please find enclosed M/s Quadrant Televentures Limited question wise response on consultation paper.

This for your information and records please.

Thanking You,

Yours Sincerely,
For **Quadrant Televentures Limited**

A handwritten signature in blue ink, appearing to be "Naveen Bhatt", written over a blue horizontal line.

Naveen Bhatt
AGM – Regulatory
+ 91 9999369579

Encl: As stated above

QUADRANT TELEVENTURES LIMITED
Corporate Identification Number : L00000MH1946PLC197474
Corporate Office : B-71, Phase-VII, Industrial Focal Point, Mohali - 160 055 (Punjab) India.
Tel : +91-172-5090000 Fax : +91-172-5090125
Regd. Office : Autocars Compound, Adalat Road, Aurangabad - 431 005 (Maharashtra) India.
Tel : +91-240-2320750-51, www.connectzone.in

Response to Consultation Paper

On

“Unsolicited Commercial Communication”

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.

QTL Response:

1. Complaint logging facility should be directly with TRAI instead of TSP, and the dissemination of complaints to respective TSP should be automatically over API which will not only reduce the time but will also help TRAI to keep visibility of 100% Customer Voice. In addition this will also help TRAI address the issue of reducing the TAT. The new technology of Machine Learning & Chatbot Solution can assist & ease citizens to handle repeated complaints of similar nature effectively and swiftly.
2. Further, TRAI should also introduce a mandatory verbiage in all the promotional messages i.e. “STOP 1909” which means that if a customer wishes to opt out from a particular Company, Sender Id etc. even if he has opted for the commercial communication! Such customer request can be forwarded to TSP over API for immediately implementation within pre-defined time lines. UAE along with other Developed Countries follow this strategy for mitigating complaints and aids to larger Citizen Interest!

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.

QTL Response:

We agree that the pre-loaded app should be made mandatory with Mobile App and in pre loaded SIM cards for new connections/SIM replacement. It should come as a PoPup at the time of registering the SIM card & Handset on network. For existing customers TRAI may utilize Proximity marketing/ digital marketing techniques for promoting, increased & quick penetration of their Apps.

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.

QTL Response:

Validation of NCPR data should be a part of MNP process and the suggestion given above in Point no 1 shall suffice and will require no more additional methods for extra validation.

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.

QTL Response:

Since registering to NCPR is the individual choice hence should be done on bulk. For individual registration you may refer of suggestion mentioned in Question no.2. Even for the family or the corporate connection, his NCPR preference can continue.

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.

QTL Response:

1. Available options are sufficient to understand customer requirement however we may consider below point for enhancing Citizen's Satisfaction Index.
2. Further, TRAI should also introduce a mandatory verbiage in all the promotional messages i.e. "STOP 1909" which means that if a customer wishes to opt out from a particular Company, Sender Id etc..even if he has opted for the commercial communication! Such customer request can be forwarded to TSP over API for immediately implementation within pre-defined time lines. UAE along with other Developed Countries follow this strategy for mitigating complaints and aids to larger Citizen Interest!

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.

QTL Response:

This should be a part of the TRAI app or the complaints can be taken by TRAI through SMS. TRAI can further investigate with TSP and local administration (Police) to close loop it. It should be treated separately.

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.

QTL Response:

As of now there is no full proof solution.

- 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.

QTL Response:

Please create a separate app & use apps like "authenticator" from Hotmail / google as a concept from version of TRAI

- Q.9. Should registration of other entities such as content providers, TM-SEs, 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.

QTL Response:

The activation process of TSP should mandatory be levied on the Resellers/Aggregators who are willing to further resell the services with strict compliances and penalties imposed to them.

- 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.

QTL Response:

This will not be a practical approach as will delay customer on boarding process and hamper the dynamic nature of the business.

- Q.11. Whether implementation of new system should full edged 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.

QTL Response:

A fully fledged system needs to be implemented.

- 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.

QTL Response:

This will not be a practical approach as will delay customer on boarding process and hamper the dynamic nature of the business. The points suggested in Point no 1 will suffice.

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.

QTL Response:

Not Required

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.

QTL Response:

The existing structure look good however in the case of promotional SMS, TM should be allowed to use Alpha sender ID to meet the purpose of brand promotion. Further the Sender ID should be allowed with maximum characters instead to current SIX Characters only.

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 exibility it may provide to TMSEs in operating it and having control on its authorized entities? Please give your suggestions with reasons.

QTL Response:

The existing process followed by TRAI is apt and can be continued.

Q.16. What steps need to be initiated to restore the sanctity of transactional SMS? What framework needs to be prescribed for those transactional SMS which are not critical in nature? Please give your suggestions with reasons?

QTL Response:

Existing system is apt.

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.

QTL Response:

Please refer our inputs against question no1

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.

QTL Response:

As suggested, since TRAI will be the central point for registering customer complaints the success rate for complaint resolution will always be on the higher side. Please refer our inputs against question no1.

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.

QTL Response:

1. The complaints for unregistered NCPR should not be entertained, if found not registered the TCP should guide him the through on-line OTP NCSP registration process.
2. For roaming, a similar process of online HLR mechanism should be implemented similar to NCPR and mandated to scrubbing the calling data before promotional calls. However, transactional communication should be kept out of purview.

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 you suggestions with reasons.

QTL Response:

Use "outsystem" to create these apps, it will provide convenience to customer to log complaint through TRAI app.

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.

QTL Response:

If we have centralized automated system as suggested in Q 1 & 2 will help mitigate UUC problem drastically.

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.

QTL Response:

No, the existing system is apt.

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.

QTL Response:

Esignature should be mandatory for authentication.

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.

QTL Response:

AI module to learn from process & automate needs to run on the TRAI system/application directly. This will enhance the suggestions made by us in point no 1.

Q.25. How the honey pots can be helpful to detect and collect evidences for unsolicited communications? Who should deploy such honey pots? Please give your suggestions with reasons.

QTL Response:

A Third party solution investigator to be appointed by TRAI to address problems.

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.

QTL Response:

Yes – this can be managed with BOT based solutions (including AI) for issues handling and keeping the CRM solutions included. However, the same needs to be maintained and run at TRAI central Server for clear visibility and execution.

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.

QTL Response:

Yes – please use “Gquery” based architecture for a fast & full proof solution.

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.

QTL Response:

Bots to manage the IN call flow – to be as a virtual investigator & action taker on top of existing IN architecture.

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.

QTL Response:

Already answered in questions between 25-28