



**Code of Practice (CoP) – Process for registration, modification and deregistration of Preferences and recording & revocation of Consent**

## A. Foreword:

- I. This Code of Practice (CoP) is formulated to comply with TRAI's The Telecom Commercial Communications Customer Preference Regulations, 2018 (6 of 2018) (TCCCP Regulations 2018).
- II. This CoP deals with process for registration, modification and deregistration of different types of preferences including mode/time/day of delivery etc. It also deals with process to record and revoke the consent by a customer, for receiving messages from a particular Sender/Consent Acquirer.
- III. For avoidance of doubt, in the case of any difference between texts, the text set out in the TCCCP Regulations, 2018 shall take precedence.
- IV. This CoP is the outcome of mandate given in TCCCPR 2018 and has evolved with the joint initiative and concurrence of all the Access Providers.
- V. The CoP will take effect as per the provisions mentioned under the section "Effective Date" of this CoP document.
- VI. Any modification to this CoP would be well within the right of RJIL, 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**

- I. Effective Date**
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## Section I. Effective Date

1. Being a huge change in the entire chain of ecosystem (i.e. system, business processes and functions to be performed by associated parties), there is a need for seeking consensus of the TRAI on first version of this CoP, before solutioning the architecture, its development and deployment.
2. As per Regulation, TRAI can give inputs to the CoP post its submission. This CoP being first of its kind, it is desirable that TRAI gives their inputs before further steps are taken by RJIL towards its implementation. This CoP will become the base document for technical solutioning purposes once RJIL receives inputs from the TRAI, or 30 days from the date of submission to the TRAI. In case of any inputs/observations from the TRAI within this period, this CoP will be effective once such inputs/observations are addressed by RJIL.
3. The solutioning of architecture, processes, its development and deployment activities will commence after finalization of CoP as per point no. 2 above.
4. The timelines for point no 3 mentioned above will depend on the actual requirements emanating from finalized CoP and the timelines given by the Solution Provider.
5. The effectiveness of new ecosystem and processes would depend on its concurrent deployment by all TSPs on a common date.

## Section II. Scope

The Scope of this CoP is to:

1. Comply with the TCCCP regulation, 2018.
2. Cover process for Registration, Modification and Deregistration of Preference(s) by consumer.
3. Cover process for Consent Recording and Revocation by consumer.
4. Provide minimum set of information which will be put on DLT system for sharing amongst all Entities and stakeholders.
5. Control on Unsolicited Commercial Communication by effective implementation of the above.



### Section III. Process for Preference Registration, Modification and Deregistration

#### A. Default status for New and Existing customers:

1. Default status of all new connections activated post implementation, will be fully unblocked.
2. In case of existing customers, the default status post implementation, would remain the same as existing. This should be applicable between 0900 and 2100 hours on all days of the week from SMS mode only and not all modes of communication since the current Preferences allow only SMS for selected preference category and not voice calls.
3. Customer may choose to modify their preferences as per this CoP, post implementation. While registering through any channel, if customer does not select mode/day/time band etc., RJIL shall consider a default setting for such cases as – all days of the week between 0900 and 2100 hours from all modes of communication.
4. In order to retain the Preference(s) and Consent status of port-in numbers, RJIL shall push a file of all port-ins for the day into the DL with the new LRN. The DL will check if the number is there already and update the new LRN and retain all existing preferences with reason for change as 'MNP'.
5. RJIL shall not deregister port-out numbers from the DL but will deregister all disconnected numbers for reasons other than port-out. RJIL shall push a file of all disconnected numbers (non-MNP) for the day and DL shall check and deregister existing numbers with reason 'Disconnection'.

#### B. Modes of Registration, Modification and Deregistration of Preference(s)

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

1. SMS on 1909
2. Voice call on 1909
3. Interactive Voice response system (IVRS) on 1909
4. Mobile Application of RJIL and/or any third party application approved by TRAI
5. Web Portal – RJIL's official website (with authentication through OTP)

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

### **C. Process for Registration, Modification and Deregistration of Preference**

#### **1. Procedure for registration or change of preference of Categories of content for Commercial Communications: -**

- a) Customer can opt-out for any or all of following Commercial Communications Content category(ies) of content, as per Table-A and foot-notes of Annexure-1.
- b) Customer can opt-in for any or all of following Commercial Communications Content category (ies) of content, as per Table-B and foot-notes of Annexure-1.

#### **2. Procedure for registration of preference or change of preference of Mode for Commercial Communications:-**

- a) Customer can opt-out of any or all of following category(ies) of mode(s) of communication, as per Table-A and foot-notes of Annexure-2.
- b) Customer can opt-in of any or all of following category(ies) of mode(s) of communication, as per Table-B and foot-notes of Annexure-2.

#### **3. Procedure for registration or change of preference of Time band(s) for Commercial Communications:-**

- a) Customer can opt-out of any or all of following time bands for receiving of commercial communications, as per Table-A and foot-notes of Annexure-3
- b) Customer can opt-in for any or all of following time band(s) for receiving of commercial communications, as per Table-B and foot-notes of Annexure-3

#### **4. Procedure for registration or change of preference of Day Type(s) for Commercial Communications:-**

- a) Customer can opt-out of any or all of following day type(s), as per Table-A and footnotes of Annexure-4:
- b) Customer can opt-in for any or all of following day type(s), as per Table-B and footnotes of Annexure-4

#### **5. Guiding Rules**

- a) Fully Block category would provide for blocking of all promotional and service messages excluding transactional messages. It will also exclude those service messages for which specific consent has already been provided by customer. Further, if a customer gives consent for a service message in future, the preference status will automatically be changed from 'FULLY BLOCK' to 'BLOCK PROMO'
- b) If a customer is in Fully blocked category, then selection of time band unblocking, will automatically put the customer in Fully Unblock category during the selected time band.
- c) If a customer is in Fully blocked category, then selection of day(s) unblocking, will automatically put the customer in Fully Unblock category during the selected day(s).
- d) If a customer is in Fully blocked category, then selection of modes unblocking, will automatically put the customer in Fully unblocked category for the selected mode.

- e) Similar treatment as per b) to d) above, will apply in case customer is in partially blocked category.

**D. SLAs for Preference registration and its effectiveness**

1. Receipt of customer's request of registration/modification/deregistration of preference(s) will be duly acknowledged within fifteen minutes of the request made by the customer with a Unique reference number (URN).
2. RJIL shall share the requisite information (defined in subsequent Section VII) on customer's preference with all relevant stakeholders through DLT interconnected systems, within 23 hours.
3. Every Access Provider shall ensure that preferences recorded or modified by the Subscriber are given effect to in near real time and in such a manner that no delivery of commercial communication is made or blocked in contravention to the Subscribers' preference after twenty four hours or such time as the Authority may prescribe.





## Section IV. Process for Recording and Revocation of Consent

### A. Process for Recording of Consent

The process captured under CoP Entities for consent recording, would apply.

### B. Process for Revocation of Consent

1. TSP shall establish facility for revoking the consent by its customers and shall make necessary arrangements:-

(1) to receive request, from the customer, for revoking the consent, if any, given by the recipient to the sender or to the consent acquirer for the purpose of receiving a commercial communication message or voice call;

(2) to provide modes, free of cost, to the customer, as per his choice, to revoke consent either by: -

*(i) sending SMS to short code 1909 with Label <Revoke> and <Sender ID> i.e. SMS header or to telephone number/level 5 short code mentioned in the message or during the voice call received from the sender(s); or*

*(ii) calling on 1909 or number mentioned for revoking the consent during the voice call received from the sender(s); or*

*(iii) calling on customer care number; or*

*(iv) Interactive Voice Response System (IVRS); or*

*(v) Mobile app developed in this regard either by RJIL, or by the Authority or by any other person or entity and approved by the Authority; or*

*(vi) Web portal with authentication through OTP; or*

*(vii) Any other means as may be notified by the Authority from time to time.*

*Note: Modes (i) to (v) to permit revocation only if the customer is calling from the same number on which he is seeking revocation of consent.*

(3) TSP will integrate the feed/input information from above sources to the Entity-CR. Technical solution for the same will be worked out subsequently after architecture solutioning is done and maybe incorporated in this CoP at a later stage.

(4) Entity-CR will remove the subscriber's contact information (telephone number to which the message was sent) from the consent record(s) corresponding to the sender for all purposes requiring explicit consent except in case specific purpose(s) (which matches with one of the consent template registered for the Sender ID) is indicated by the customer during revocation of consent from the consent register within 1 business day;

(5) Entity-CR will duly acknowledge the customer's request to revoke the consent with unique reference number;

(6) Entity-CR will ensure that any person who receives request to revoke consent, must not disclose the customer's personal information to others without his consent;

- (7) Entity-CR will fetch details of the consent including its purpose(s), details about day and time when it was taken, and details about sender(s) or consent acquirer(s) who has or have taken the consent;

**C. OTP generation, delivery and authentication:**

1. OTP can be generated for following scenario:
  - a. Consent recording: Where an SMS from a short code (toll-free level '5' as defined in CoP-Entities), containing SMS header, purpose of seeking consent and OTP is delivered to customer, as part of consent recording process.
  - b. Consent revocation: Where consumer gives a request for consent revocation through web-portal, an OTP would be sent to customer through SMS along with the SMS header from which revocation is sought.
2. The validity of the OTP, in both the above scenarios, would be 10 minutes.
3. OTP will be valid for each transaction separately.
4. OTP generation, delivery and Validation:
  - a. Entity-CR will be responsible to generate OTPs and send the same to customer through SMS connectivity.
  - b. In case of OTP for consent recording Customer would need to send the OTP to the same short code, through which OTP was delivered to customer.
  - c. Post receipt of OTP from customer, the Entity-CR will authenticate the same and record customer's consent post successful validation.
  - d. Post successful validation or failure, customer will be informed accordingly, through SMS.

**Section V. Consequence management**

1. In case of default/breach in functions to be performed by respective Entities registered/appointed by RJIL, strict action shall be taken against the same which may include warning notice, show cause notice, penalty, temporary or permanent termination etc.
2. RJIL shall formulate an internal process on above.



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

### A. DL-Preference

1. Recording preferences on Distributed Ledger for Preferences (DL-Preferences)
  - a) RJIL shall automate its internal systems and develop appropriate APIs to interact with DL-Preferences;
  - b) RJIL shall record preferences on DL-Preferences for requests received from all modes;
  - c) These revised preferences shall be available, in real time, for considerations by entities for scrubbing process for new list of telephone numbers under process, however, earlier messages or voice calls which have already been scrubbed and have validity may be delivered;
2. RJIL shall establish, maintain and operate Distributed Ledger(s) for Preference (DL-Preference) with requisite functions, process and interfaces: -
  - a) to record choices of preference(s) exercised by the customer in the Distribute Ledger for Preferences (DL-Preferences) in an immutable and non repudiable manner;
  - b) to record, at least, following details of the customer who has registered its preference(s) for the main categories:
    - (i) telephone number in the international numbering format as referred in the National Numbering Plan;
    - (ii) lifetime history till the customer is active in its network, with date(s) and time stamp(s), of choices exercised by the customer for registering his preference(s) and subsequent changes to it made by the customer from time to time;
    - (iii) changes in the subscription of telephone number, during the process of opening and closing of subscription;
    - (iv) unique registration number issued at the time of registration of preference(s);
  - c) to interact and exchange information with other relevant entities, responsible to carry out functions for regulatory compliance(s), in a safe and secure manner;
  - d) to support any other functionalities as may be required to carry out functions for regulatory compliance(s);

### B. DL-Consent

- a) RJIL, by itself, or through Entity-CR, shall establish, maintain and operate Distributed Ledger(s) for Consent (DL-Consent) with requisite functions, process and interfaces: -
  - (i) to record consent given by the customer to sender(s) or consent acquirer(s) in the Distribute Ledger for Consent (DL-Consent) in an immutable and non repudiable manner;

- (ii) to record following details of the consent: -
  - (1) telephone number of customer in international numbering format as referred in National Numbering Plan;
  - (2) Header of Sender(s) or Consent Acquirer(s) against which consent is taken;
  - (3) Day & Time when consent was taken;
  - (4) Validity period of consent;
  - (5) Type and purpose(s) of consent;
- (iii) to make consent data accessible for other entities in safe and secure manner;
- (iv) to keep record of revocation of consent by the customer with specific purpose(s), if any, in an immutable and non-repudiable manner;
- (v) to interact and exchange information with other relevant entities, responsible to carry out functions for regulatory compliance(s), in a safe and secure manner;
- (vi) to support any other functionalities as may be required to carry out functions for regulatory compliance(s);

## Section VII. Amendment to CoP

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

- a) It is understood that the CoP stipulates various requirements which are interlinked with CoPs of other TSPs as well. Considering the same, wherever the amendment can lead to change in information sharing with other TSP and/or billing, processing etc. with other TSP, such amendment shall be shared with a two-week advance intimation before actually implementing the same.
- b) Wherever there is any material change for any existing Sender(s) which impacts performance of its obligations, an advance notice of at least 7 calendar days along with changes and its effective date for such existing Sender(s), shall be given on their respective registered email-id.

## Section VIII. Publication of CoP

This CoP shall be published by RJIL on its website. A digital copy of the same shall be sent to below, on their appointment/registration:

- a) Entity - HR
- b) Entity - Consent Registrar
- c) Entity- Telemarketer functional Entity registrar
- d) All registered Sender(s)
- e) All registered Telemarketers
- f) All registered Aggregators

Further, on any amendment to the CoP, same shall be published by RJIL on its website.

## Section IX. Definitions

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

## Section X. Version History

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

S.No.	Date	Version	Details
1.	16.10.2018	1.0	COP-Preference_RJIL-base document

## Section XI. Annexures

### Annexure-1

**Table – A**

Commercial Communications Category to be blocked or opted out	IVRS: Call to 1909 and press at prompt to block	SMS: Send SMS to 1909 following text
All CC Categories (to be blocked) except transactional type of commercial communications	0	FULLY BLOCK
All CC Categories (to be blocked) except transactional and service type of commercial communications	50	BLOCK PROMO
(i) Banking/Insurance/Financial products/ credit cards,	1	BLOCK 1
(ii) Real Estate,	2	BLOCK 2
(iii) Education,	3	BLOCK 3
(iv) Health,	4	BLOCK 4
(v) Consumer goods and automobiles,	5	BLOCK 5
(vi) Communication/Broadcasting / Entertainment/IT,	6	BLOCK 6
(vii) Tourism and Leisure,	7	BLOCK 7
(viii) Food and Beverages;	8	BLOCK 8

**Table - B**

UCC Category to be unblocked or opted in	IVRS: Call to 1909 and press at prompt to unblock	SMS to 1909 following text
All UCC Categories (to be unblocked)	90	UNBLOCK ALL
All UCC Categories (to be unblocked) except Promotional	51	UNBLOCK SERVICE
(i) Banking/Insurance /Financial products/ credit cards,	91	UNBLOCK 91
(ii) Real Estate,	92	UNBLOCK 92
(iii) Education,	93	UNBLOCK 93
(iv) Health,	94	UNBLOCK 94
(v) Consumer goods and automobiles,	95	UNBLOCK 95
(vi) Communication/Broadcasting / Entertainment/IT,	96	UNBLOCK 96
(vii) Tourism and Leisure,	97	UNBLOCK 97
(viii) Food and Beverages;	98	UNBLOCK 98

## Annexure-2

**Table-A**

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

UCC Mode of Communication (Choices for Preference(s))	IVRS: Call to 1909 and press at prompt to block	SMS: Send SMS to 1909 following text
All Categories of Mode (to be blocked)	10	BLOCK 10
(i) Voice Call,	11	BLOCK 11
(ii) SMS,	12	BLOCK 12
(iii) Auto Dialer Call (With Pre-recorded Announcement),	13	BLOCK 13
(iv) Auto Dialer Call (With Connectivity to live agent),	14	BLOCK 14
(v) Robo-Calls,	15	BLOCK 15

**Table - B**

UCC Mode of Communication (Choices for Preference(s))	IVRS: Call to 1909 and press at prompt to block	SMS: Send SMS to 1909 following text
All Categories of Mode (to be unblocked)	80	UNBLOCK 80
(i) Voice Call,	81	UNBLOCK 81
(ii) SMS,	82	UNBLOCK 82
(iii) Auto Dialer Call (With Pre-recorded Announcement),	83	UNBLOCK 83
(iv) Auto Dialer Call (With Connectivity to live agent),	84	UNBLOCK 84
(v) Robo-Calls,	85	UNBLOCK 85



### **Annexure-3**

**Table – A**

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

UCC Time band for Communication (Choices for Preference(s))	IVRS: Call to 1909 and press at prompt to block	SMS: Send SMS to 1909 following text
All Time Bands (to be blocked)	20	BLOCK 20
(i) 00:00 Hrs to 06:00 Hrs,	21	BLOCK 21
(ii) 06:00 Hrs to 08:00 Hrs,	22	BLOCK 22
(iii) 08:00 Hrs to 10:00 Hrs,	23	BLOCK 23
(iv) 10:00 Hrs to 12:00 Hrs,	24	BLOCK 24
(v) 12:00 Hrs to 14:00 Hrs,	25	BLOCK 25
(vi) 14:00 Hrs to 16:00 Hrs,	26	BLOCK 26
(vii) 16:00 Hrs to 18:00 Hrs,	27	BLOCK 27
(viii) 18:00 Hrs to 21:00 Hrs,	28	BLOCK 28
(ix) 21:00 Hrs to 24:00 Hrs,	29	BLOCK 29

**Table – B**

Customer can opt-in for any or all of following time band(s):

UCC Time band for Communication (Choices for Preference(s))	IVRS: Call to 1909 and press at prompt to block	SMS: Send SMS to 1909 following text
All Time Bands (to be unblocked)	70	UNBLOCK 70
(i) 00:00 Hrs to 06:00 Hrs,	71	UNBLOCK 71
(ii) 06:00 Hrs to 08:00 Hrs,	72	UNBLOCK 72
(iii) 08:00 Hrs to 10:00 Hrs,	73	UNBLOCK 73
(iv) 10:00 Hrs to 12:00 Hrs,	74	UNBLOCK 74
(v) 12:00 Hrs to 14:00 Hrs,	75	UNBLOCK 75
(vi) 14:00 Hrs to 16:00 Hrs,	76	UNBLOCK 76
(vii) 16:00 Hrs to 18:00 Hrs,	77	UNBLOCK 77
(viii) 18:00 Hrs to 21:00 Hrs,	78	UNBLOCK 78
(ix) 21:00 Hrs to 24:00 Hrs,	79	UNBLOCK 79

## Annexure-4

**Table - A**

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

UCC Day Type(s) for receiving Communication (Choices Preference(s))	IVRS: Call to 1909 and press at prompt to block	SMS: Send SMS to 1909 following text
All Day Type(s) (to be blocked)	30	BLOCK 30
(i) Monday	31	BLOCK 31
(ii) Tuesday	32	BLOCK 32
(iii) Wednesday	33	BLOCK 33
(iv) Thursday	34	BLOCK 34
(v) Friday	35	BLOCK 35
(vi) Saturday	36	BLOCK 36
(vii) Sunday	37	BLOCK 37
(viii) Public Holiday and National Holiday	38	BLOCK 38

**Table - B**

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

Day Type(s) for receiving Commercial Communication (Choices Preference(s))	IVRS: Call to 1909 and press at prompt to block	SMS: Send SMS to 1909 following text
All Day Type(s) (to be unblocked)	60	BLOCK 60
(i) Monday	61	BLOCK 61
(ii) Tuesday	62	BLOCK 62
(iii) Wednesday	63	BLOCK 63
(iv) Thursday	64	BLOCK 64
(v) Friday	65	BLOCK 65
(vi) Saturday	66	BLOCK 66
(vii) Sunday	67	BLOCK 67
(viii) Public Holiday and National Holiday	68	BLOCK 68