

Code of Practice for Entities of Ecosystem (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') and subsequent Directions and guidelines issued by TRAI.
- 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. It also provides for the process for header registration.
- III. For avoidance of doubt, in case of any difference between texts, the text set out in the TCCCP Regulations, 2018 shall take precedence. In case of any confusion in interpretation or clarification needed, the clarifications thus provided by Vodafone Idea Limited (VIL) shall be final and binding.
- IV. This CoP is the outcome of mandate given in TCCCP-2018 and has evolved with the joint initiative and concurrence of all the Access Providers.
- V. Any modification to this CoP would be well within the right of VIL, 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.
- VI. Vide TCCCP Regulations, 2018, TRAI has adopted a co-regulatory approach, which is not prescriptive in nature like other Regulations issued by TRAI. In line with the co-regulatory approach, there may be some processes/activities which may not be exactly in sync with methods/ways/timelines laid down in TCCCP 2018, but have been adopted/undertaken by VIL to comply with the Regulations in the most practical manner. Any disconnects in the approach with that specified in the Regulations should not be considered as non-compliance of the Regulations.
- VII. .

B. Sections

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Section I. Scope

The Scope of this CoP is to:

1. Comply with the TCCCP regulation, 2018 and subsequent Directions and guidelines issued by TRAI.
2. Effective control of Unsolicited Commercial Communication.
3. Cover process for registration of 'Sender(s)' (i.e. Principal Entities or Content Providers) and their obligations, who will be assigned and allocated the headers (SMS or voice CLIs), Consent Template, Content Template, Content Template, CTA whitelisting and Verification and Scrubbing etc.
4. Provide minimum set of information which will be put on DLT system for sharing with different Entities and in between TSPs.

Section II: Appointment of Entities/ Registrars

1. VIL, through wireless network or through wireline network, at its sole discretion, may choose to perform the functions of an Entity(s) by its own or may also choose to delegate the same to a third party or a combination of both. However, commercial communication message like any SMS or other message can be originated and sent only by an Access Provider either through its wireless network or wireline network as per its discretion.
2. At its own discretion, VIL may choose to provide right of sub-delegation to the Primary 3rd party to whom functions have been delegated as per this CoP. The Primary 3rd Party will need to take approval of VIL for sub-delegating any functions to the Secondary 3rd Party before appointment of said Secondary 3rd Party. This should be followed by confirmation of appointment of said Secondary 3rd Party, to be provided by Primary 3rd Party to VIL within 3 calendar days of appointment.
3. If delegated to a third party:
 - a. VIL will have proper authorization of such Legal entity through legal agreements, which should at least contain strict conditions for safety, security and confidentiality of the information being made available over the DLT system.
 - b. VIL may check that the third party is not an individual but, a reputed legal entity (i.e. public or private listed company or proprietorship firm, as per Indian laws).
4. VIL may choose to appoint one third party for performing the functions of various Entities, or may choose multiple third parties to perform different activities or may choose multiple third parties for an individual activity.

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, may be declared by VIL on its website.;
- (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 may be given unique identity by VIL to be used to authenticate and track the events;
- (4) VIL may formulate structure and format for headers to be assigned for the purpose of commercial communications via sending SMS for Promotional SMS, Transactional SMS and Service SMS. Three types of entities may register & get allocated with a Unique ID, post registration namely Principal Entity, Telemarketer & Aggregator. Only legal entities/ organizations can register as an "Entity" at DLT. Details such as Organization name, Industry Category (Govt/ Private Ltd/ Public Ltd/ SEBI/ Others), PAN or TAN, Address & type of entity are mandatory at the time of registration which get updated at DLT.

Only the above information filled in by the Entity at the time of initial registration with VIL who becomes its Parent/ Creator operator are updated on DLT.

Any modifications to the above information at DLT have to be initiated by the Entity with his parent operator.

During registration, Entity has to upload its PAN / TAN document & Proof of Address which is further validated by the Entity-Registrar of the operator. Proof of Identification (as agreed between all operators) is the PAN / TAN & this is unique for an entity & its entity class (PE/TM/TA) across DLT.

Validation through OTP on both mobile number & email id is done by VIL during the registration. The details mentioned by the Entity & the documents uploaded at the time of registration are maintained by VIL.

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

The validation is same for entities across Industry categories & Entity class, except for Government entities & SEBI registered brokers.

Exceptional approvals may be granted for Government Entities on the basis of 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.

In case the Government Entity declares that they don't have PAN/TAN/GSTN, approval is provided on the basis of declaration on the Organization letter head along with Address Proof provided by the Entity.

SEBI registration certificate is to be uploaded for the broker entities registering under SEBI industry category

Entities are communicated on the registered E-mail ID post validation by VIL on both successful & unsuccessful registration.

Section III: Types of Entities Registration and their functions:

There are seven types of Entities which are to be appointed by VIL, either to be done within 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. Header Registrar (Entity – HR)

A. Broad Functions:

- a. 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;
- b. carry out pre-verifications of documents and credentials submitted by business entity or legal entity requesting for assigning of the header during Entity registration;
- c. bind with a mobile device and 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;
- d. 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;
- e. carry out additional authentications in case of a request for headers to be issued to government entities, corporate(s) or well-known brands, 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;

- f. maintain header register, in a secure and safe manner, and make accessible relevant information for identifying the assignee at the time of request.
- g. carry out Header Registration Function;
- h. keep record of headers throughout its lifecycle, i.e. free for assignment, assigned to an entity, withdrawn, surrendered, re-assigned etc.
- i. keep record of header(s) reserved for specific purpose;

B. Process steps to be followed:

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

Header Registration is carried out basis the below 2 tables for Promotional & Service/ Transaction SMS:

HTYP	Length	Type	Ruleset
PROMOTIONAL	6 Characters	Numeric	Allowed
		Alpha	Not Allowed
		Alpha Numeric	Not Allowed
TRANSACTIONAL/ SERVICE	Government		
		Numeric (3-8 Characters)	Starts with 1 if length =6, not allowed
		Alpha (3-6 Characters)	Allowed
		Alpha Numeric	On Hold
	Non-Government		
		Numeric	Not Allowed
		Alpha (3-6 Characters)	Allowed
		Alpha Numeric	Allowed

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
Others	0

- i. Sender has no right or ownership on the header(s) allocated. In case of any dispute or otherwise, in pure discretion of VIL, the assignment of header(s) can be revoked, with or without notice. VIL under its discretion, can disallow allocation of specific headers as well.
 - ii. The assignment of header(s) will as per commercial terms prescribed by VIL.
 - iii. The Sender registration and/or headers assignment will be done by VIL for its own resources, as per the process prescribed herein.
 - iv. For the messages categorised under Promotional and Service categories, a charge upto Rs. 0.05 per SMS can be charged by the Terminating Access provider (TAP) from the Originating Access Provider (OAP). This charge is over and above the normal SMS Termination charge (Presently, Rs. 0.02 per SMS).
 - v. The definition of Promotional, Service and Transactional message would be as per TCCCP Regulation, 2018. For the purpose of clear understanding, it is to be noted that Transactional SMS would be only those OTP messages that are required to complete the banking transactions (National/Scheduled/Private/Government and even MNC Banks) pertaining to buying or selling of any goods or services and are directly required for completing the said banking transaction.
 - vi. For the purposes of sending messages to its own subscribers, VIL may/may not need to undergo registration process under this CoP. As the connection by itself is part of service opted by customer, VIL can send Service and Transactional messages to its own customers without seeking separate consent. For the purposes of sending promotional messages to its own customers, VIL would have to ensure scrubbing of preference register.
- b) carry out pre-verifications of documents and credentials submitted by an individual, business entity or legal entity requesting for assigning of the header;

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

- a) Only the PE can raise request for headers by logging in their PE account in the DL, filling up a simple Universal Application form and mentioning the header(s) required in the prescribed

format. Basis the table above, they will mention the header name & purpose of the same – whether Promotional or Service/ Transactional.

- b) The entity has to select the “Category” defined in the above table while requesting for the header.
- i. In case of individual, the authorized signatory and authorization letter will not be required.
 - ii. In case of Government agencies approaching directly Entity-HR, the KYC documents will not apply. In case a Registered Telemarketer (RTM) with VIL, approaches on behalf of Government agencies, then, an undertaking would have to be furnished by said RTM that the Header will be used for sending said Government agency’s SMS only. It is to be noted that the Header will be registered in the name of the concerned Government agency only.
- c) Check that the header(s) should be related to company name or initial alphabets of the words in the company name or said individual or the brand name such Sender holds.
- c) 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;

Process to bind mobile device and its role: Upon written approval from VIL, Entity-HR should also aim to launch a mobile app/website or any other mode, (wherever applicable), enabling Sender(s) to login securely and safely for using different services which VIL may choose to provide through such mode. The mobile app should have authentication based on the registered mobile number and/or email id of the Sender. IL to also aim for other features of binding a mobile number to the resources provided to a Telemarketer/Sender, to ensure authentication through said mobile number before login to a session.

- d) 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.

- e) carry out additional authentications in case of a request for headers to be issued to government entities, corporate(s) or well-known brands, including specific directions, orders or instructions, if any, issued from time to time by the Authority;
- f) carry out additional checks for look-alike Headers which may mislead to a common recipient of commercial communication, it may also include proximity checks, similarity after substring swaps, etc.

Process steps for Additional checks for look-alike headers:

- a. When a header request is raised, it is first validated against the entity's name along with its brand, goods & services dealt by it.
- b. 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
 - i. 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
 - ii. If there is a striking semblance to any well known/ popular brand or company or Government authority – the requested is rejected & reason for the same communicated to the entity.

If, despite all best efforts as above, a header is allocated to an entity, and the bonafide entity approaches VIL later for the header or for preventing the other entity from using it, VIL may withdraw or re-allocate the header. This to be provided in the standard agreement.

- g) **Process steps for Registration of Sender and/or Header:** Post successful checks and documents availability as per above sub-clause from a) to f), the Entity-HR will register the Sender and/or assign the header/header root and make respective entries in the system.
- h) 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 among TSPs.
- i) **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.

Such de-registration 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 VIL from time to time.

- j) 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. Resources for voice calls should be given to Entity from number series (GSM/Wire-line i.e. 140) allocated to VIL for telemarketer activity. Also, there is no

mechanism to identify header of voice calls whether it is transactional/service or promotional. Depending upon technical feasibility, VIL may choose to allocate naming feature to be displayed as CLI for commercial voice calls made to its own subscribers.

k) 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 entity approaches for the same header in same LSA.
- ii. In case, two entities at one point of time seek a particular header

In both the above scenarios, VIL may frame a guiding framework to resolve such issues, on case to case basis.

l) Header Delinking Process

Principal Entity should reach out to VIL customer Care and register their concerns on the unavailability of Header.

VIL Customer Care should do preliminary validation of the claim such as if the requested header is created & registered by VIL or another TSP. If other TSP, then the customer to be informed to take it up with the respective TSP.

In case the header is created and registered with VIL, 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, 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).

In case Donor Entity is of other TSP, Principal Entity has to approach respective TSP to get the header released.

For looklike Headers allotted to different Principal Entities, on release from one entity, header will get inactivated for that entity and will now move to free pool.

m) Reverification of the Headers registered on the DLT platform to be carried out as per TRAI Direction dated 16th Feb 2024.

n) Headers which remain unused for last thirty days will be temporarily deactivated and can be reactivated by PEs through an online process.

2. Consent Template Registrar (Entity-CsTR) and Consent Registrar (Entity-CR)

A. Broad Functions:

- a) establish and maintain consent register as distributed ledger to keep consent, in a secure and safe manner, and make accessible relevant data for the Scrubbing Function.
- b) establish Customer Consent Acquisition Facility (CCAF), to record recipient's consent to receive commercial communications from the sender or consent acquirer; the method of acquiring consent to be standard across all TSPs.
- c) establish Customer Consent Verification Facility (CCVF) for the purpose of facilitating:
 - i. customers to verify, modify, renew or revoke their consent in respect of commercial communications, through a web interface and
 - ii. Access Providers to verify the consent in case of complaint;
- d) keep consent for each consent acquirer, in a manner that client data of entity is adequately protected;
- e) keep record of revocation of consent by the customer, whenever exercised, in an immutable and non-repudiable manner
- f) synchronize records, in real time, among all consent ledgers available with participating nodes in Consent Acquisition Functionality in an immutable and non-repudiable manner;
- g) perform any other function and keep relevant details required for carrying out pre and post checks for regulatory compliance;
- h) Rules for Consent Template:

The consent template should have a link for the receiver to click on the same and provide the consent.
The Process/Method/way of acquiring the consent is Principal Entity's responsibility.
Generally to consent template should look like - "To receive messages regarding updates and promotions from <Organisation Name> please click on the link below : <LINK>"
While rejecting any consent template, Registrar comments section needs to be populated.

B. Process steps to be followed:

- a) Record consent via Customer Consent Acquisition Functionality on Consent Register, on its own or through its agents, to facilitate consent acquirers to record the consent taken from the

customers in a robust manner which is immutable and non-repudiable and as specified by relevant regulations;

Process Steps for Recording Consent:

- i. The sender will share the consent template which should explicitly convey the purpose, with the consent template registrar (Entity-CsTR), which is to be presented to the customer for acquiring consent and clearly mention purpose of the consent and details of the sender (Header).
 - ii. The Entity-CsTR will cross check the consent template with purpose, Header and sender and approve/disapprove the same for the registration. In case of rejection, the sender to share the revise template. Entity-CsTR will assign a unique ID to each approved consent template.
 - iii. VIL under their discretion, can disallow registration of some/particular consent template(s) based on any specific content through keywords or otherwise.
 - iv. The Entity-CsTR will register and record the approved consent template along with sender and header name in its register (will replicate at Header Registration)
 - v. VIL/Entity-CsTR may charge sender for such template registration as per their commercials.
- b) Presenting content of consent acquisition template to the customer before taking consent;
- c) Taking agreement to the purpose of consent and details of sender;
- d) Authenticate customer giving the consent through OTP/QR Code scan/Missed Call or any other mechanism or combination thereof;

Process Step for Presenting content of consent acquisition, taking agreement and authentication:

- i. The sender may have multiple consent templates registered with Entity-CsTR.
- ii. Sender will initiate a trigger to Entity-CR along with registered consent template ID and MSISDN (individual or in batches) for presenting the same to the consumer seeking his consent. – Bulk Consent Acquisition by Principal Entity is available where Principal Entity can upload bulk consent of MSISDN against consent template ID and capture the date of Consent Acquisition from Customer. DLT will not allow any consent which is prior to 6 months from the date of upload. Once the consent is uploaded in DLT, same will be valid for 6 months from date of upload
- iii. Entity-CR will share the registered consent template containing details of the sender and Header (Principal Entity name/brand name e.g. Amazon) and OTP with the consumer through

short code as SMS. Consumer will respond back on the same short code (toll free level 5, to be identified by each TSP) with OTP, to provide consent for the stated consent template.

- iv. The Entity-CR will cross check the OTP and do the automated Authentication. On the successful confirmation of OTP, the consent is recorded in the system paired with the MSISDN along with date and time of such consent from the consumer (time when it hits the system). Post consent recording, a confirmation is sent to the consumer through SMS, and also to the Sender. Similar process steps will be followed for other modes of acquiring consent via QR scan or Web portal.
 - v. In case of OTP mismatch, consumer and sender/consent acquirer will be notified.
- e) record revocation of consent by the customer via revoke request in a robust manner which is immutable and non-repudiable and as specified by relevant regulations;

Process Step for recording revocation of Consent:

The revocation of consent can happen through various modes mentioned below:

- i. sending SMS to short code 1909 with Label <Revoke> and <Sender ID> or to telephone number 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. Mobile app developed in this regard either by the Authority or by any other person or entity and approved by the Authority; or
- v. Web portal with authentication through OTP; or
- vi. Any other means as may be notified by the Authority from time to time.

The detailed process on revocation of consent is covered in CoP- Process for Registration, modification and Deregistration of Preferences and Recording and Revocation of Consent, and its provisions would be binding on Entity-CR and Sender(s)/Consent Acquirers.

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) Brand name is mandatory in all templates registered

- d) maintain with minimum performance requirements as specified;
- e) 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 and service message template;

Process Steps for checking Content offered for registration:

- i. Sender or Telemarketer on behalf of the Sender, will share with Entity-CTR the proposed template to be registered under the category of transactional or service message, for the purposes of the subscribers of VIL which has appointed Entity-CTR. Further, the sender will also provide consent template id (as provided during registration) for the proposed template of service messages. 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.
 - 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.
 - iii. Entity-CTR will cross check the content of the service message template and transactional message template as well as checking the service message template falling under the purpose (Commercial Communication) as defined in the consent template.
 - iv. VIL under its discretion, can disallow registration of any content template based on any specific content through keywords or otherwise.
- b) to identify fixed and variable portion(s) of the content in the offered transactional template and service message template with identification of type of content for each portion of variable part of the content, e.g. date format, numeric format, name of recipient, amount with currency; reference number, transaction identity;**

Process Steps:

- i. Entity-CTR is required to ensure the above.
- c) to estimate the total length of variable portion, viz. total length of fixed portion for a typical transactional message, service message for offered template;**

Process Steps:

- i. Entity-CTR to ensure that the length of the variable portion for a typical transactional and service message should not be more than xx% of the total length. Entity-CTR along with TSP, would put in place a process for approval of exception to this percentage threshold.

d) to de-register template or temporarily suspend use of template; (Subject to availability)

Process Steps:

- i. Entity-CTR will de-register/ temporarily suspend use of a content template (transactional or service) in case of following scenarios:
 - a) In case of repeated complaints as defined in the complaint handling CoP.
 - b) In case of non-usage of the template for a defined period.
 - c) As per inputs arising from CoP Detect or otherwise as per discretion of VIL.
- e) to generate one-way hash for fixed portion of content of template and ways to extract fixed portion and variable portion(s) from actual message for carrying out pre and post checks of actual content of actual message offered for delivery or already delivered;
- f) assigning unique template identity to registered template of content;

Process Steps for assigning unique template identity:

- i. Entity-CTR to assign unique id to each template against each registered sender id and update the system.
- g) Reverification of the Content templates registered on the DLT platform to be carried out as per TRAI Direction dated 16th Feb 2024.

4. Telemarketer functional Entity Registrar (Entity-TFER)

Process Steps:

- i. VIL itself or through an entity (Entity-TFER) will register Telemarketer functional Entities i.e. TM-SF, TM-DF, TM-AF and TM-VCF and arrange execution of respective agreements with them, as per the format specified by TSP.
- ii. These Telemarketer functional entities will perform respective functions as mentioned hereinafter.
- iii. It is in complete discretion of VIL to appoint and register one or multiple entities as TM-SF.

- iv. VIL may formulate process and scenarios for de-registration of Telemarketer Functional Entities

5. Telemarketer for Various Functions

A. Telemarketer - Scrubbing Function (TM-SF):

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) to process scrubbing as defined, in a secure and safe manner, using preferences and consent of customer(s) and category of content;
- b) provide details about preferred time slots and types of days for delivery;

Process Steps for processing Scrubbing:

- i. The Telemarketer or Sender can both approach for the scrubbing function. The Originating TSP (OAP) will send the request for scrubbing to terminating TSP (TAP) and TM-SF appointed by TAP will do the scrubbing and generate token for OAP and also retain the OAP token with itself.
- ii. For Scrubbing function can be for either category of message i.e. promotional, service and transactional.
- iii. The Scrubbing function would mean checking of customer's preference or consent, depending upon the message being promotional or Service respectively. The Service message may also have category of messages which can be sent with Inferred consent, which have to be suitably categorized in the said category during the content template registration. For transactional message, the content scrubbing would not be required. VIL may choose, at its own discretion, to have Scrubbing function and Content Template verifier function, to be done simultaneously, through a single entity or a single system. It would be at VIL's discretion to do dynamic dipping i.e. based on random percentage, pattern or all transactions.
- iv. 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 of TAP as per the format prescribed by the TAP/TM-SF.

- v. The TAP's TM-SF will scrub the promotional message with the Preference register (including checking the preferred time slots and types of days for delivery) and generate a Token which should also contain preferred time slots and types of days for delivery.
 - vi. In consumer's interest and to ensure proper compliance, it is most important that the scrubbing is done by TAP so that none of the messages should go to customers beyond the opted preferred time slots and types of days for delivery and proper content and consent dipping is ensured, ruling out possibility of spam messages to its consumers. Spam messages to consumer's leads to huge inconvenience to customers as well as complaint management at TAP end.
 - vii. Similarly, TAP's TM-SF will scrub the service message with the Consent Register and generate a Token.
 - viii. OAP has to pay commercial charge for 'Scrubbing as a Service' to TAP. This charge shall be decided by TAP from time to time and will be applicable in between OAP and TAP, on reciprocal basis and will be over and above the Re. 0.05 charge for promotional/ service message and Re.0.02 SMS termination charge.
- c) take necessary measures to protect Preference Register and Consent Register data during scrubbing, e.g. by Generating virtual identities and tokens for each number for the messages and voice calls and not disclosing real identities to any other entity than authorized to know it;

Process Steps for Protection of Data during scrubbing:

- i. The Tokens generated by the TM-SF will not disclose the real identities (i.e. MSISDNs) to the Telemarketer/Sender. TM-SF will share the OAP Token with OAP and TAP Token with TAP. These Token are to be used by respective OAP and TAP for ascertaining the content of message, SMS header and actual list of MSISDNs on which the SMS is to be sent. OAP may charge the Sender/Telemarketer for the scrubbing and decrypting of token, through TM-SF or directly.
 - ii. It is understood that TSPs may have different levels of controls and systems. A TAP would like to have strict control on scrubbing activity to ensure there is no inconvenience to its consumers and no UCC is made to them. Therefore, to prevent spam to go to their subscribers, TAP would have to undertake scrubbing function. OAP has to pay commercial charge for 'Scrubbing as a Service' to TAP. This charge shall be decided by TAP from time to time and will be applicable in between OAP and TAP, on reciprocal basis and will be over and above the Re. 0.05 charge for promotional/ service message and Re.0.02 SMS termination charge.
- d) make available relevant details of scrubbed list to corresponding OAPs and TAPs for carrying out reverse mapping of virtual identities to real identities for further delivery;

Process Steps for reverse mapping:

- i. Make available relevant means to identify the actual subscriber to which the message needs to be delivered

- e) to identify and report probable instances of request received for scrubbing of list of phone numbers collected through harvesting software or instances of dictionary attack to relevant entities authorized to take action;

Process Steps for identifying and reporting instances of harvesting software or dictionary attack:

- a. TM-SF and TAP should put in place system to identify probable instances of list of phone numbers collected through harvesting software or instances of dictionary attack.
- b. The broad rules for such identification should be fixed by TAP and its' TM-SF from time to time. If required, same should be shared with TRAI for guidance. Since, the system development and vendor finalization is yet to start, hence, the identification rules are not available at this stage.
- c. Once identified, TM-SF should report such instances to OAP, for further necessary action against the Sender / Telemarketer. OAP will be bound to take action and inform TAP within 3 working days of such information being received.

B. Telemarketers for Delivery Function (TM-DF) of Messages with telecom resource connectivity to AP:

1. Broad Function:

- a) carry out delivery function
- b) insert its Unique identity with delivery processing reference number along with identity through which scrubbing was carried out;
- c) authenticate source of the messages submitted for delivery by header assignee or by aggregator and ensure their identity is part of content of message for traceability;
- d) maintain with minimum performance requirements as specified;
- e) perform any other function and keep other relevant details which may be required for carrying out pre and post checks for regulatory compliance;

2. Process Steps to be followed:

- a) deliver messages to OAP, in a secure and safe manner, during specified time slots and types of days of delivery in accordance to the preferences of the customer(s);

Process Steps: TM-DF to follow above including broad functions.

- a) select OAP for particular customer(s) or messages and conveying to Scrubber for generating tokens for corresponding OAP to access information of list of messages which would be required to be delivered by it;
- b) In the case of voice call above mentioned scrubber function will not work due to non-availability of Consent. Only scrubber will be done against preferences of customer.

- c) TM will convey to Scrubber for generating tokens for corresponding OAP to access information of list of messages which would be required to be delivered by it;
- d) VIL offer secured bind feature wherein any entity work with Direct TM-DF can tag the same over VIL DLT and ensure only respective TM_DF mapped carry the traffic via VIL, its currently available only with VIL DLT as feature.

Process Steps:

- i. TM-DF to follow above including broad functions.
- ii. In line with the Token generating provisions mentioned in section related to TSP's TM-SF, the same activity related to Token generation, decryption should be carried out by TM-SF of TAP. The Token containing virtual identities should be shared by TM-SF with OAP, and which can then share it with TM-DF.

C. Telemarketers for Aggregation Function for messages to other Telemarketer for delivery function (TM-AF):

1. Broad Functions:

- a) carry out aggregation function;
- b) keep record of all numbers aggregated for complaints resolution and traceability;
- c) authenticate source of the messages submitted for delivery by header assignee or by aggregator and ensure their identity is part of content of message for traceability;
- d) maintain with minimum performance requirements as specified;
- e) perform any other function and keep other relevant details which may be required for carrying out pre and post checks for regulatory compliance;

2. Process to be followed:

- a) deliver messages to RTM having telecom resource connectivity with access provider(s), in a secure and safe manner;

Process Steps: TM-AF to follow above including broad functions.

D. Telemarketer for voice calling function with Telecom Resource Connectivity for voice calls to Access Provider (TM-VCF)

1. Broad Functions:

- a) to carry out voice calling function;

- b) take necessary measures to protect Preference Register and Consent Register data during voice calling, e.g. using virtual identities to make voice calls on a secure Internet Protocol (IP) based Virtual Private Networks (VPN) with OAP and not disclosing real identities to any other entities than authorized to know it;
- c) take initiatives, based on technical feasibility, to enable calling name display (CNAM) based on Intelligent Network or ISDN based protocols, enhanced calling name (eCNAM) functionality as defined in 3GPP technical specifications TS 24.196 for providing services to terminating user with the name associated with the originating user and optionally delivering metadata about that originating user;
- d) maintain with minimum performance requirements as specified;
- e) perform any other function and keep other relevant details which may be required for carrying out pre and post checks for regulatory compliance;

2. Process Steps to be followed:

- (a) deliver voice calls to OAP, in a secure and safe manner, during specified time slots and types of days of delivery in accordance to the preferences of the customer(s);
- (b) select OAP for particular customer(s) or voice calls and conveying selected OAPs to Scrubber for generating tokens for corresponding OAP to access information of list of messages which would be required to be delivered by it;

3. Process Steps for delivery of voice calls:

- (a) Above to be followed including the broad functions.
- (b) In line with the Token generating provisions mentioned in section related to TM-SF, the same activity related to Token generation, decryption should be carried out by TM-SF and TAP for voice calls as well and the Token containing virtual identities should be shared by TM-SF with OAP/TM-VCF.

Section V. Consequence management

1. In case of default/breach in functions to be performed by respective Entities registered/appointed by VIL, VIL should take strict action against the same which may include warning notice or show cause notice or penalty or temporary/permanent termination etc.
2. VIL should formulate an internal process on above.
3. Action of blacklisting can be taken against Telemarketer or aggregator doing the SMS or voice delivery function. For this, the TSP taking action of blacklisting should inform other TSPs along with details of default.

Section VI. 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 Template
 - a) Consent Template registration unique number
 - b) Consent template format including fixed and variable portion
 - c) SMS header
 - d) Sender ID
4. Consent Register
 - a) Customer Number
 - b) Consent Template registration unique number
 - c) SMS header
 - d) Date/time of OTP message generation
 - e) Date/time of OTP validation and consent recording
 - f) Validity of consent, if any
5. Content Template
 - a) Sender ID
 - b) SMS header
 - c) Consent Template registration unique number
 - d) Content Template
 - e) Fixed portion and Variable portion
 - f) Linked Telemarketer

Section VII. Amendment to CoP

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

- a) It is understood that CoPs stipulate 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 should be shared with two weeks 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), should be given on their respective registered email-id.

Section VIII. Publication of CoP

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

- a) Entity - HR
- b) Entity – Consent Template Registrar
- c) Entity - Consent Registrar
- d) Entity - Content Template Registrar
- e) Entity – Content Template Verifier
- f) Entity- Telemarketer functional Entity registrar
- g) All registered Sender(s)
- h) All registered Telemarketers
- i) All registered Aggregators

Further, on any amendment to the CoP, same may be published by VIL over its website and also sent to above over their registered email-ids.

Section IX. Definitions

In this Code of Practice, unless the context otherwise, 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

Sr. No	Version Number	Date of Submission to TRAI
1.	VIL_CoP_Entities - 1.0	17 th October 2018
2.	VIL_CoP_Entities - 1.1	15 th January 2021
3.	VIL_CoP_Entities - 1.2	22 nd June 2021
4.	VIL_CoP_Entities - 1.3	4 th November 2024