

**The Telecom Commercial Communications Customer  
Preference Regulations 2018**

**Code of Practice for Complaint Redressal Mechanism (“CoP –  
Complaint”)**

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**A. Foreword:**

- i. This document is formulated to comply with “The Telecom Commercial Communications Customer Preference Regulations released dated July 19<sup>th</sup>, 2018 by the Telecom Authority of India (TRAI) (“TCCCP Regulations 2018”).
- ii. This document can be here after named as “Code of Practice-Complaint handling or CoP-Complaint”.
- iii. The Code of Practice formulated in this document only refers to the complaint handling related to the complaints received to Access provider by its subscribers for Unsolicited Commercial Communication.
- iv. For avoidance of doubt, in the 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 STPL shall be final and binding.
- v. The CoP will take effect from the date mentioned in Section-I Effective Date. Its technical and system solutioning and implementation will start post said Effective Date and its timelines would be as per the Section I.
- vi. Any modification to this CoP would be well within the right of STPL.
- vii. With no liability of any financial claim or damages or any other adverse action, subject to suitable information of such changes being provided to concern Entities.

**B. Sections:**

- I. Scope
- II. Process for Complaint registration, verification and resolution
- III. Process for Complaint Resolution and Remedial action against sender(s)
- IV. Information handover on DLT to Entities and/or other TSPs
- V. Consequence management
- VI. Amendment to CoP
- VII. Publication of CoP
- VIII. Definitions
- IX. Version History

**Section - I**  
**Scope**

**The Scope of this CoP is to:**

1. Comply with the TCCCP Regulation, 2018.
2. Ensure effective and timely handling and resolution of UCC complaints raised by customers.
3. Cover process and modes for registration of complaints by customers  
Complaints received within 7 days of UCC will be accepted & complaints received beyond 7 days, customer would be educated about the process TAT. Here complaints which are within 3 days of UCC will be considered as valid and complaints between 4 days to 7 days will be considered as Report.
  - a. Process for complaint handling, verification and resolution, including necessary action on UCC made by RTM & UTM.
  - b. Provide Network system functioning conditions including SLAs and architecture.
  - c. Provide minimum set of information which will be put on DLT system for sharing with different Entities and in between TSPs

**Section - II**  
**Process for Complaint Registration, Verification and Resolution**

**A. Modes of Complaint Registration:**

**Note** – STPL is currently offering services to Enterprise customers. The below COP provision shall be applicable from the date when the services are launched to retail customers.

**1. Procedure for UCC Complaint registration through Voice Call.**

S. No.	Procedure
1	<b>Customer to dial Toll Free number 1909 to register the UCC complaint.</b>  Customer to provide following details to customer care executive. <ol style="list-style-type: none"><li>a) Date of UCC communication received.</li><li>b) SMS Header or Telephone number from which UCC received.</li><li>c) Brief description of UCC received.</li><li>d) Referred telephone number(s), if any.</li><li>e) TSP can add time requirement to the format as optional field.</li><li>f) On Successful registration of complaint, customer will get unique reference number within 15 mins of complaint registration.</li><li>g) If validation unsuccessful, the customer care executive will inform the customer accordingly.</li></ol>

<b>2</b>	<b>Customer to write Email to register the UCC complaint.</b>
	<p>Customer to provide following details to customer care executive.</p> <ol style="list-style-type: none"> <li>a) Date of UCC communication received.</li> <li>b) SMS Header or Telephone number from which UCC received.</li> <li>c) Brief description of UCC received.</li> <li>d) Referred telephone number(s), if any.</li> <li>e) TSP can add time requirement to the format as optional field.</li> <li>f) On Successful registration of complaint, customer will get unique reference number within 15 mins of complaint registration.</li> <li>g) If validation unsuccessful, the customer care executive will inform the customer accordingly.</li> </ol>
<b>3</b>	<b>Procedure for UCC Complaint registration through Web Portal</b>
	<ol style="list-style-type: none"> <li>a) Customers to provide STPL number on which UCC is received.</li> <li>b) Below inputs to be mandatory filled by the customer. <ul style="list-style-type: none"> <li>• Date &amp; approx time of UCC received.</li> <li>• SMS Header or Telephone from which UCC received.</li> <li>• Brief description of UCC received.</li> </ul> </li> <li>c) After providing all inputs, customer will get an option to generate OTP.</li> <li>d) Customer to enter OTP on UCC complaint registration page.</li> <li>e) An automated SMS containing unique complaint number will be sent to customer within 15 minutes of complaint registration.</li> </ol>
<b>4</b>	<b>Procedure for UCC Complaint registration through STPL mobile APP mode:</b>
	<ol style="list-style-type: none"> <li>a) Customer to visit STPL APP for registering UCC complaint.</li> <li>b) Customers to enter his/her STPL number. Below inputs to be mandatorily filled by the customer. <ul style="list-style-type: none"> <li>• Date &amp; approx. time of UCC received.</li> <li>• SMS Header or Telephone from which UCC received.</li> <li>• Brief description of UCC received.</li> </ul> </li> <li>c) After providing all inputs, customer will get an option to generate OTP.</li> <li>d) Customer to enter OTP on UCC complaint registration page.</li> <li>e) An automated SMS containing unique complaint number will be sent to customer within 15 minutes of complaint registration.</li> </ol>

<b>5</b>	<b>Procedure for UCC Complaint registration through SMS:</b>
	<p>a) Customer to send SMS in below format on Toll Free number 1909 to register the UCC complaint.          “The details of unsolicited commercial communication, XXXXXXXXXXXX, dd/mm/yy” Where XXXXXXXXXXXX– is the telephone number or header of the SMS, as the case may be, from which the unsolicited commercial communication has originated.          Explanation: The telephone number or header and the date of receipt of the unsolicited commercial SMS may be appended with such SMS, while forwarding to 1909, with or without space after comma. In case of UCC over voice, customer may provide content of communication in brief. After providing all inputs, customer will get an option to generate OTP.</p> <p>b) If SMS format is incorrect, an automated error reply SMS will be sent to customer along with correct format.</p> <p>c) If format is correct, the complaint will be registered in STPL’s systems and an automated SMS with unique complaint number will be sent to customer within 15 minutes of complaint registration.</p>

<b>6</b>	<b>Procedure for UCC Complaint registration through TRAI-DND App :</b>
	<p>a) The TRAI DND app is supporting in registration of customer complaints through an API- based flow. Customers who have downloaded the TRAI DND App can register their complaints on the app in the designated format. An API-based flow has been created with STPL’s DLT platform where the complaint details are received from the TRAI DND app through dedicated APIs and the complaint gets registered in STPL’s systems and an automated SMS containing unique complaint number is sent to customer within 15 minutes of complaint registration.</p>

**7. Procedure for UCC Complaint registration through Any Other mode:**  
 STPL may choose to take and register UCC complaints from customer on any other mode / platform as decided by STPL from time to time. Also, other modes as released by Authority time to time.

**Section - III**  
**Process for Complaint Resolution and Remedial action against**  
**Sender(s)**

**A. Complaint Mechanism:**

1. TAP shall also verify if the date of receipt of complaint is within three days of receiving commercial communication and in case the complaint is reported by the customer after three days, the TAP shall communicate to the customer about the closure of his complaint in accordance to this CoP and change status of complaint on DL-Complaint as a report instead of complaint.
2. Post receipt of complaint through above-said modes, Terminating Access Provider (TAP) shall record the complaint on DL-Complaints and shall notify the details of the complaint to the concerned Originating Access Provider (OAP).
3. Post above, TAP shall examine within one business day from the date of receipt of complaint, to check the occurrence of complained communication between the complainant and the reported telephone number or header from which UCC was received and update the findings on DL-Complaints. In case, occurrence not available then, complaint/report to be updated as invalid.

Alternatively, DL-Complaint should be auto-updated for complaint status and action taken when the complaint status is updated in CRM.

<b>S. No</b>	<b>Process for Complaint Handling</b>	<b>Action taken process</b>
1)	<b>Complaint Handling Process In case the Complaint is related to Registered Telemarketer (RTM)</b>	Offence against PE/RTM will be registered up to 12 instances of non-compliance and penalty as per the agreement between OAP and Telemarketer.
2)	<b>Action Taken against RTM</b>	Warning issued & penalty levied on RTM and resource disconnection & blacklisted for 2 years on 12 <sup>th</sup> Instance.
3)	<b>Complaint Handling Process In case the complaint is related to Unregistered Telemarketer (UTM)</b>	Offence against UTM will be registered up to 4 instances of non-compliance.

4)	<b>Action Taken against UTM</b>	Warning issue on 1st & 2nd instance and Barring for 30 days on 3rd instance on respective numbers / DIDs followed by all Telecom resource disconnection on 4th instance and blacklisting for 2 years.
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I. **In case the Complaint is related to Registered Telemarketer (RTM):** The OAP (it includes the TSP who is both TAP and OAP), in case the complaint is related to RTM, shall examine, within one business day from the date of receipt of complaint, whether all regulatory pre-checks were carried out in the reported case before delivering Unsolicited Commercial Communications.

a) Pre-checks would involve checking:

- i. CDR to check occurrence of complained communication.
- ii. Sender and Header/CLI was registered.
- iii. If content was a Service message, whether related customer consent was taken or not.
- iv. DND Status of the complainant.
- v. OAP will check whether the content was a transactional message or not, basis the transactional template
- vi. Complaint received within 3 days of UCC.
- vii. Customer Preference

b) In case, all regulatory pre-checks were carried out and delivery of commercial communication to the recipient was in confirmation to the provisions of the regulation and related CoPs, OAP shall communicate to TAP to inform basis complainant about the closure of complaint as „No Action required“ basis the reason of such action- For example in case of CDR showing no such occurrence of complained communication, the OAP shall communicate to TAP to inform complainant about the closure of complaint as “CDR Not Match”.

c) In case, any of the regulatory pre-checks were not carried out, the OAP shall within three business days from the date of receipt of complaint, take actions against the defaulting entity and communicate to TAP to inform the complainant about the action taken against his complaint through DL-Complaints.

Offence against PE/RTM will be registered up to 12 instances of non-compliance and penalty as per the agreement between OAP and Telemarketer. Financial penalty for each instance of non-compliance will be levied. On the 12<sup>th</sup> instance PE/RTM will be blacklisted on the DL. Incase Template is Service Implicit or Transaction, complaint will be closed as Invalid and no Opt-ins will be sought from TM/PE.

- d) In case, any violation occurs due to incorrect template registered, complaint to be closed as Valid and routed to Original Registrar TSP to blacklist the Template in DL. No Violation to be tagged against the Telemarketer and no penalty applicable to TM or OAP.
- e) In case of voice UCC, however, if complaint mentions use of Auto-dialer and the caller has not informed use of Auto-dialer to OAP, the OAP will additionally, issue a notice to the calling entity seeking explanation and adherence of the thresholds of the abandoned and silent calls provided as per the Regulation.
- f) The OAP shall take appropriate remedial action, as provided for in the agreement between the PE /RTM and the OAP, to control Unsolicited Commercial Communications.
- g) With respect to rejection reasons ‘Service SMS/Call’ & ‘Not promotional in nature’ (basis opt-in from RTM/PE), these communications are invariably found to have been sent by senders claiming a bona fide business relationship with the complainant basis which these messages were sent as service messages and were not UCC. All these complainants have, at some time or other, shown interest in the products/ services being offered by these senders, and have willingly shared their contact details/consent/Opt-in. It may be noted, however that there is no conclusive mechanism with TSPs to establish the veracity of the consents/opt-ins, hence we rely on their submission from the PEs/RTMs only. Till the time we move to a digital consent regime, the consents/opt-ins provided by the senders will have to be trusted on their face value.

**II. In case the complaint is related to Unregistered Telemarketer (UTM): The OAP**

- a) Shall examine communication detail records (CDRs), within one business day from the date of receipt of complaint, to check the occurrence of complained communication between the complainant and the reported telephone number or header from which unsolicited commercial communication was received.
- b) In case of no occurrence of complained communications under sub-regulation (5)(a), OAP shall communicate to the TAP to inform the complainant about the closure of complaint as “CDR not match-OAP”.



- c) In case of occurrence of complained communications under sub-regulation (5)(a), OAP shall further examine, within two business days from the date of complaint, whether there are similar complaints or reports against the same sender; and;
- d) In case it is found that number of complaints against the sender are from less than ten unique recipients over a period of last seven days (for this complaint information from all TSPs available over DLT to be used), the OAP shall, from the previous thirty days data of CoP UCC\_ Detect System, check whether suspected sender is involved in sending Commercial Communication in Bulk or not. Bulk for this purpose would be as defined by STPL from time to time. All UTMs are found under Bulk communication assuming STPL is into Enterprise WLN Business model.
- e) In case, sender has sent commercial communications in bulk, the OAP initiate investigation as provided for in point no. “D” above. (Usage capping technically not feasible for wireline).
- f) In case, sender has not sent commercial communications in bulk, the OAP shall warn such sender through a notice to be delivered.

**Action against UTM:**

OAP shall issue notice, within three business days from the TAP upload date to give opportunity to such sender(s), under clauses E(iii) (a) and (b) above to represent their case and shall

- a. investigate, within 7 business days from the date of receipt of complaint and shall conclude whether the communication so made was UCC or not; and conclusion of the investigation was that sender was engaged in sending unsolicited commercial communications, OAP shall take action against such sender as under:
  - i. For first instance of violation, due warning shall be given. Warning is issued to UTM. Provided that the first instance of the violation shall include all the complaints against the sender within two business days after the date of receipt of the first complaint, against which the sender is to be warned under this sub-regulation.
  - ii. For the second instance of violation, warning shall be given. Warning is issued to UTM. Provided that the second instance of the violation shall include all the complaints against the sender within two business days after the date of receipt of the first complaint, against which the sender is to be warned under this sub-regulation
  - iii. For the Third instance of violation, Outgoing Services will get barred for 30 days (Usage cap functionality not available in Wire line N/w). Provided that the third instance of the violation shall include all the complaints against the sender after the issuance of first warning

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within two business days after the date of receipt of the complaint against which third warning is being given to the sender. Barring will be applied on 4th working day on respective numbers / DIDs

- iv. For Fourth and subsequent instances of violations, all telecom resources of the sender shall be disconnected for a period up to two years and OAP shall put the sender under blacklist category and communicate to all other access providers to not to allocate new telecom resources to such sender for up to two years from the date of such communication.
  - a) Provided that the fourth instance of the violation shall include all the complaints received against the sender after the date of second warning within two business days after the receipt of the complaint against which telecom resources are being disconnected
  - b) Provided further that one telephone number may be allowed to be retained by such sender with the Outgoing barred for a period up to two years, subject to payment of commercial consideration to such effect as decided by STPL from time to time.

<b>Instance</b>	<b>UTM Action</b>
1st instance of violation	UTM subscriber to provide clarification in 3 working days, in case of failure, 1st Warning Notice to be issued to subscriber (UTM).
2nd instance of violation	UTM subscriber to provide clarification in 3 working days, in case of failure, 2nd Warning Notice to be issued to subscriber (UTM).
3rd instance of violation	UTM subscriber to provide clarification in 3 working days, in case of failure apply barring for 30 days. Barring will be applied on 4th working day on respective numbers / DIDs.
4th & subsequent instance of violation	UTM subscriber to provide clarification in 3 working days, in case of failure, all resources of UTM subscriber will be disconnected on 4th Day for a period up to two years and & the sender will be put under blacklist category.

*\*Instance of the violation shall mean all the complaints against the sender within two working days from receipt of first complaint. In the case of number of complaints during the two days exceeds 100, disconnection of resources shall be done against the UTM subscriber, and the sender will be put under blacklist category.*

**Complaint closure codes against UCC Complaints:**

Sr. No.	Explanation of complaint's closure code:
<b>1</b>	<b>Service message / Call:</b>
	<p>The Complaints/cases closed under "Service SMS/Call" due to opt-in, it is submitted that when investigated, these communications were found to have been sent by senders claiming a bona fide business relationship with the complainant basis which these messages were sent as service messages and were not UCC. All these complainants have, at some time or other, shown interest in the products/services being offered by these senders, and have willingly shared their contact details. Also note that most UCC complaints these days arise out of communication sent by Senders to these complainants by virtue of their subscription to the Senders' mobile apps, downloaded by the complainants voluntarily, without realizing that they have willingly consented to receive such communication while signing up. It is pertinent to mention here that, as highlighted earlier also at several instances, there is no conclusive mechanism with TSPs to establish the veracity of these consents; hence, we rely on the submission from the RTMs only. We submit that STPL has examined the content of the commercial communication to be unsolicited or not, and validated the opt-ins/proof of relationship submitted by the RTM at the time of complaints resolution, to conclude whether the communication in UCC or not.</p>
<b>2</b>	<b>CDR not match:</b>
	<p>The complaints/cases closed under "CDR not match" are those cases wherein customer/TAP has entered the sender's number of date of receiving UCC incorrectly in the complaints and in the investigation no details found. Therefore, in all such cases TAP has to inform their customer to register the complaints with correct details. We also highlight that, M/s STPL as OAP don't have direct interaction with complainant/customer.</p>
<b>3</b>	<b>Incomplete / Incorrect details:</b>
	<p>The complaints/cases closed under "incomplete/incorrect details" are those cases wherein no action could be taken by OAP against the sender due to insufficient or incomplete/incorrect information provided in the complaints. Therefore, in all such cases TAP has to educate/inform their customer to register the complaints with complete/correct details. We also highlight that, M/s STPL as OAP don't have direct interaction with complainant/customer.</p>
<b>4</b>	<b>Complaints wrongly routed:</b>
	<p>The complaints/cases closed under "complaints wrongly routed" are those cases wherein TAP wrongly route the complaints to STPL despite header not belongs to STPL.</p>
<b>5</b>	<b>Customer not registered-RTM:</b>
	<p>The complaints / cases closed under "Customer not registered-RTM" are those cases wherein customer has not registered their preferences and despite of that customer have made complaints.</p>

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<b>6</b>	<b>Not promotional in nature / Not a UCC:</b>
	The complaints/cases closed under "Not promotional in nature / Not a UCC" are those cases wherein the content of SMS is of OTP / Transactional / Service related communication.
<b>7</b>	<b>Duplicate:</b>
	The complaints/cases closed under "Duplicate" are those cases wherein customer has made same complaints twice against the same number and same reason. Therefore the 2nd such complaint was closed under duplicate complaints category and the 1st complaint has been addressed as per process.
<b>8</b>	<b>Preference not blocked:</b>
	The complaints/cases closed under "Preference not blocked" are basis on customer's DND preference. As per DND directions of TRAI, customer can either opt for "Fully blocked DND" or "Partially blocked DND" category as per his convenience / requirement. In these cases, customers have opted for "Partial blocking of DND". Hence the SMS has been relayed accordingly.

## Section - IV

### Information handover over DLT between TAP and OAP

#### **1. By TAP: On receipt of Complaint**

- a) Date and time (if reported by complainant) of UCC
- b) Date and time of receipt of complaint
- c) Sender and recipient of complained UCC
- d) Unique reference number
- e) Text as captured during the registration of complaint
- f) Reference number mentioned in complaint, if any.

#### **2. By OAP, after investigation**

- g) Unique reference number
- h) Date and time of receipt of complaint
- i) Date and time (if reported by complainant) of UCC
- j) Complainant Number
- k) Header/number from which UCC is received
- l) TAP name
- m) TAP Service area
- n) Date of UCC referred to OAP
- o) UCC TYPE (Voice or SMS)
- p) Description of UCC
- q) CDR status (Matched/Not Matched)
- r) Action Taken
- s) Remarks

## Section - V Consequence Management

In case of UCC emanating from telecom resources allocated to RTM, STPL may impose suitable and deterrent penalty, as per the agreement signed between STPL and RTM.

**Section - VI**  
**Amendment to CoP**

This CoP can be amended by STPL 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 – VII Publication of CoP**

This CoP may be published by STPL on its website after the implementation of the new systems and processes. Further, on any amendment to the CoP, same may be updated by STPL over its website

**Section - VIII Definitions**

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

**Section - IX Version History**

<b>Sr. No</b>	<b>Version Number</b>	<b>Date of Submission to TRAI</b>	<b>Effective Date of CoP</b>	<b>Main/Amendment Number</b>
1	VM IPL_CoP_ Complaints 1.0	28 <sup>th</sup> May 2019	As per clause mentioned in CoP	Main
2.	VM IPL_CoP_ Complaints 1.1	21 <sup>st</sup> Jan 2021	As per clause mentioned in CoP	Amendment
3.	VM IPL_CoP_ Complaints 1.2	9 <sup>th</sup> Jul 2021	As per clause mentioned in CoP	Amendment
4.	STPL_CoP_ Complaints 1.3	30 <sup>th</sup> Dec 2024	As per clause mentioned in CoP	Amendment