

Code of Practice for Complaint Handling (CoP – Complaints)

A. Foreword:

- i. This document is formulated to comply with “The Telecom Commercial Communications Customer Preference Regulations released dated July 19th, 2018, as amended from time to time, by the Telecom Authority of India (TRAI). (‘TCCCP Regulations 2018’).
- ii. This document can be here after named as “Code of Practice for Complaint Handling or CoP-Complaints”.
- iii. The Code of Practice formulated in this document refers to the complaint handling related to the complaints received by RJIL from its own subscribers, and those from subscribers of other TSPs, for Unsolicited Commercial Communication originating from RJIL network.
- iv. For avoidance of doubt, in the case of any difference between texts, the text set out in the TCCCP Regulations, 2018, and appurtenances thereto, as amended from time to time, shall take precedence. In case of any confusion in interpretation or clarification needed, the clarifications thus provided by RJIL shall be final and binding.
- v. 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 concern Entities.
- vi. Unlike other regulations issued by TRAI, TCCCPR-2018 is a unique regulation, which is not prescriptive in nature, but based on co-regulation approach, wherein regulations lay down the principles and desired outcomes rather than specify details on how to achieve them. In line with this co-regulation approach, there may be some processes/procedures/activities which may not exactly be in sync with methods/ways/timelines suggested in the TCCCPR 2018 and/or appurtenances thereto, as amended from time to time, but have been adopted/undertaken by RJIL to comply with the Regulations in most-practical manner. Any disconnects in the approach with that suggested in the TCCCPR 2018 may not be deemed to be non-compliance of the Regulations so far as the desired outcome is believed to be achievable through such approach.

B. Sections

- I. Scope
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- III. Process for Complaint Resolution and Remedial action against sender(s)
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Section I. Scope

The Scope of this CoP is to:

1. Comply with the TCCCP Regulation, 2018 and appurtenances thereto, as amended from time to time.
2. 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 (including the date of UCC) will be accepted as 'complaints', & those received between 8 days to 15 days will be considered as 'Report'. Any complaint received beyond 15 days (including the date of the UCC) will be auto-rejected by the systems.

- a. Process for complaint handling, verification and resolution, including necessary action on UCC made by Registered and Unregistered Telemarketers (RTMs & UTMs).
- b. Provide Network system functioning conditions including SLAs.
- 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

1. Procedure for UCC Complaint registration through Voice Call

Sr.no.	Procedure
1	Customer to dial Toll Free number 1909 or helpline numbers 198 or 199 to register the UCC complaint.
2	Customer to provide following details to customer care executive. a) Date of UCC communication received. b) SMS Header or Telephone number from which UCC received. c) Brief description of UCC received. d) Referred telephone number(s), if any.
3	Customer care executive will validate the complaint for below conditions: a) The subscriber is registered in DND with preference of related category being blocked. b) Consent given for such Commercial Communication(s) (once the Consent Registration Framework (CRF) goes live) c) The call is being made from the same number on which UCC received.
4	a) After successful validation, the customer care executive will register the complaint in respective system and communicate the unique complaint number to customer. Further, an automated SMS containing unique complaint number will be sent to customer within 15 minutes of complaint registration. b) If validation is unsuccessful, the customer care executive will inform the customer accordingly.

2. Procedure for UCC Complaint registration through SMS

Sr.no.	Procedure
1	Customer to send SMS in below format on Toll Free number 1909 to register the UCC complaint. “Brief description of the call/SMS received, , XXXXXXXXXX, dd/mm/yyyy” Where XXXXXXXXXX– is the telephone number or header of the call/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.
2	If SMS format is incorrect, an automated error reply SMS will be sent to customer along with correct format.
3	If format is correct, the complaint will be registered in RJIL’s systems and an automated SMS with unique complaint number will be sent to customer within 15 minutes of complaint registration.

3. Procedure for UCC Complaint registration through Web Portal

Sr.no.	Procedure
1	Customer clicks on the Do not disturb (DND) link on the landing page and logs into his account on the RJIL website for registering UCC complaint. He then clicks on the 'Do Not Disturb' link which takes him to Complaint Registration page.
2	Customer to provide below inputs mandatorily: a) Select mode of communication. b) SMS Header or Telephone number from which UCC received. c) Brief description of UCC received. d) Date of call/SMS e) Referred Telephone Number, if any f) Category of goods which was being promoted g) Company referred - name of the company/business for which the call/SMS was received (not mandatory)
3	Complaint will be auto raised in RJIL's systems and an automated SMS containing unique complaint number will be sent to the customer within 15 minutes of complaint registration.

4. Procedure for UCC Complaint registration through RJIL's MyJio App

Sr.no.	Procedure
1	Customer to login in his account on the MyJio app (if not logged in already), and clicks on the Do Not Disturb (DND) icon on the main page, for registering UCC complaint. Once in, click on the 'complaint' icon and fill and submit the complaint web form displayed there.
2	Customer to provide below inputs mandatorily: a) Mode of communication. b) SMS Header or Telephone number from which UCC received. c) Brief description of UCC received. d) Date of call/SMS e) Referred Telephone Number, if any f) Category of goods which was being promoted g) Company referred - name of the company/business for which the call/SMS was received (not mandatory) The customers also have the option to auto-pick the caller number from the phone book logs and not have to manually type the same. In case of SMS, there is an option to auto-pick the header as well as the content of the SMS.
3	Complaint will be auto raised in RJIL's systems and an automated SMS containing unique complaint number will be sent to the customer within 15 minutes of complaint registration.

5. Procedure for UCC Complaint registration through TRAI-DND App :

The TRAI DND app supports 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 RJIL's DLT platform where the complaint details are received from the TRAI DND app through dedicated APIs and the complaint gets registered in RJIL's systems and an automated SMS containing unique complaint number is sent to customer within 15 minutes of complaint registration.

The customers also have the option to auto-pick the caller number from the phone book logs and not have to manually type the same.

In case of SMS, there is an option to auto-pick the header as well as the content of the SMS.

6. Procedure for UCC Complaint registration through email :

The Customer may send an email with the following mandatory details to 1909@jio.com.

- a) Date of UCC received.
- b) SMS Header or Telephone number from which UCC received.
- c) Brief description of UCC received.
- d) Referred Telephone Number, if any.

Agents handling the emails at this dedicated desk register the complaint in RJIL's systems and an automated SMS containing unique complaint number is sent to the customer within 15 minutes of complaint registration.

7. Procedure for UCC Complaint registration through Any Other mode: RJIL may choose to take and register UCC complaints from its customers on any other mode / platform as decided by RJIL from time to time. Also, other modes as indicated by the Authority from time to time may be reasonably considered.

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 seven days of receiving commercial communication and in case the complaint is reported by the customer after seven days, but within fifteen 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-Complaints 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) in an automated manner.
3. Contrary to earlier provisions, the Second Amendment Regulations also provide for the non-DND-registered customers to file UCC complaints against UTMs and for such complaints to be treated as valid complaints, they are reported within the stipulated 7 days, and as 'report' for the subsequent 7 days.
4. **In case the Complaint is related to Registered Telemarketer/Entity (RTM/Entity for SMS and calls from 140-series numbers):** 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; and
 - i. Pre-checks would involve checking:
 - a. CDR to check occurrence of complained communication
 - b. Sender and Header/CLI was registered
 - c. If content was a Service message, whether related customer consent was taken or not. (opt-in in as is scenario, to be replaced with Digital Consent once live)
 - d. OAP will check whether the content was a transactional message or not, basis the transactional template
 - e. Customer Preference
 - ii. 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 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'. **TAP will update the status of complaint in CRM.**

The following scenarios / rejection reasons are those where no action is required to be taken against the reported RTM/ Sender. The reason for each one of these is self-explanatory, and these complaints do not require any further investigation on the DL nor seek any further information/ justification from the RTM /Sender.

Sr. No	Type of Rejection
1	Not a UCC (basis opt-in from RTM/PE)
2	Service SMS/Call (basis opt-in from RTM/PE)
3.	Not promotional in nature
4	Incomplete /incorrect info
5	Customer not registered/ Preference not blocked
6	Complaint wrongly routed
7	CDR not match - OAP
8	Duplicate complaint
9	UCC > 7 Days Old – Report
10	Call Forwarding

iii. In case, any of the complaint not being invalidated under regulatory pre-checks, the OAP shall take actions against the defaulting entity as under and communicate to TAP to inform the complainant about the action taken against his complaint through DL-Complaints. **TAP will then update the action taken and the status of complaint in CRM.**

- (a) For every valid complaint, a warning/notice will be issued to Entity/RTM;
- (b) In addition to the above, all headers and templates will be reviewed and blacklisted as required.
- (c) In extreme cases of repeat violations, or inappropriate/fraudulent use of RTM resources, the PE/RTM may be blacklisted with immediate effect.
- (d) In the event that RJIL is held liable for any Financial Disincentive (FD) on account of these complaints, RJIL reserves the right to recover this FD from the PEs/RTMs responsible for such complaints or for providing opt-ins which do not corroborate their claim of customer opt-in. RJIL may recover a fixed amount per complaint or distribute the entire FD amount amongst the PEs/RTMs in proportion to the number of complaints against them.
- (e) In case of UCC emanating from telecom resources allocated to RTM, RJIL may impose suitable and deterrent penalty, as per the agreement signed between RJIL and RTM/Sender.

iv. In case Template is Service Implicit or Transactional, complaint will be closed as Invalid and no Opt-ins/Consent will be sought from TM/PE.

v. In case any violation occurs due to incorrect template registered (especially under Service Implicit or Transactional category, complaint to be closed as Valid and routed to

Original Template Registrar TSP to blacklist the Template in DL and also review all other templates of the said PE.

- vi. 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 may 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.
- vii. The OAP shall take appropriate remedial action, as provided for in COP-Complaints and the agreement between the PE /RTM and the OAP, to control Unsolicited Commercial Communications.
- viii. With respect to rejection reasons 'Service SMS/Call' or 'Not a UCC (basis opt-in from RTM/PE, to be replaced by Digital Consent in near future)', 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.
- ix. 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 the submission from the PEs/RTMs only. Till the time we move to a digital consent regime, which is already in the pilot stages, the consents/opt-ins provided by the senders will have to be trusted on their face value.
- x. In case of complaints against resources allocated to a VNO, complaints are forwarded to respective VNOs for further action and TRAI shall take up such cases directly with the VNOs involved.
- xi. In case the complaint is found to be because of failure of Scrubbing, remedial action will be taken at network and IT end. Complaint will be closed under reason reflecting technical issues, with no violation to be tagged against TM/ PE.

5. In case the complaint is related to Unregistered Telemarketer (UTM):

The OAP shall -

- a. Verify the Complainant DND status for complaints received for 1600XXX. If DND not-registered, complaint to be closed as Preference not Registered. If DND-registered then Sender to be notified.
- b. notify the receipt of the complaint to the Sender with such details which help the Sender to start the investigation immediately

- c. 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
- d. 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'.
- e. In case of occurrence of complained communications under sub-regulation (5)(a), OAP shall further examine whether there are similar complaints or reports against the same sender; and
- f. In case, it is found that number of complaints or 'reports' against the sender is from five or more unique Recipients/complainants during the last ten days, initiate investigation by issuing a notice to the Sender, under sub-regulation (5)(d)(i) to give opportunity to represent the case within 5 days ; investigate within five business days from the date of receipt of representation from the Sender and record the reasons of its findings and if the conclusion of is that the Sender was engaged in sending the Unsolicited Commercial Communications, it shall act against such Sender as under-
 - a) for the first instance of violation, outgoing services of all the telecom resources of the Sender including PRI/SIP trunks etc. ((a)1600XX & Unregistered Numbers of the Sender incase Violation is recorded against 1600XX ; (b) Incase Violation is against **Unregistered Number**, barring will be for all Voice resources of Sender excluding registered resources) for a period of fifteen days and shall be notified to all other Access Providers for needful action at their end, irrespective of whether such all resources other than the misused resource have been used for sending UCC or not;
 - b) for the second and subsequent instances of violations – in case, a second violation is due to unregistered telemarketer numbers, all unregistered Voice telecom resources of the Sender including PRI/SIP trunks, mobile etc. shall be disconnected for one year and shall be notified to all other Access Providers for needful action on their end, irrespective of whether such resources other than the misused resource have been used for sending UCC or not; OAP shall put the Sender under the blacklist category and no new telecom resources shall be provided by any Access Provider to such Sender during this period; However, in case the second violation is due to misuse of 1600XX resources, all unregistered Voice telecom resources along with all 1600 resources shall be disconnected and the sender will be blacklisted.

Provided that one telephone number may be allowed to be retained by such Sender during this period:

Provided further that Sender can represent to OAP against action due to first or subsequent instance of violation; OAP shall decide the representation within a maximum period of seven business days and shall record its findings. Provided also that Sender

may make a representation to the Authority against such decision of OAP as provided under regulation 29;

In case, number of complaints against the Sender are from less than five unique Recipients during the last ten days, OAP shall issue a notice/warning to the sender for each such complaint to refrain from using their unregistered telecom resources for commercial communication and that continued usage may lead to barring/disconnection/blacklisting of their entire account.

The OAP shall also communicate to TAP to inform the complainant about the closure of complaint with 'action taken' on their complaint, provided that the Authority may, if it so desires, by direction, specify the content and method of making such communication to the complainant.

It may be noted here that the above actions are as per the provisions of the TCCCPR 2018 and its Second Amendment Regulation 2025, which, on one hand, are difficult to implement and sustain, especially for large enterprises, Banks, FIs and other large customers, and, on the other hand, are a little weak in identifying senders for penal action since the Second Amendment ignores bulk usage as a criterion for qualifying for penal action which was a major identifier criterion in the Principal Regulation.

In view of this, the TSPs have shared a more pragmatic, commonly agreed alternate proposal for Enterprise customer segment with the TRAI. Early discussions with the TRAI have drawn positive response from the Authority, who have agreed to incorporate the industry proposal in the forthcoming Amendment.

Summary of penal action against RTMs/UTMs

S.No.	Process for Complaint Handling	Wireline	Wireless
1)	In case the Complaint is related to Registered Telemarketer (RTM)/Sender using registered SMS headers or 140-series voice resources)	(a) For every valid complaint, a warning/notice is being issued to Entity/RTM; (b) In addition to the above, all headers and templates are reviewed and blacklisted as required. (c) In extreme cases, even the PE is blacklisted (d) complaints against 140-series numbers are invariably a result of technical issue during scrubbing or issues like call-forwarding only, for which needful corrective action is taken.	Not applicable
3)	In case the complaint is related to Unregistered Telemarketer (UTM) or 1600xx service calling resources for registered Senders	Action taken as per 2nd Amendment – Refer Section [5] on Pg [11] above. Warning/notice for every valid complaint below threshold. 1st violation - 15-day barring of resources for valid complaints above threshold. 2nd violation - Disconnection and blacklisting.	Action taken as per 2nd Amendment – Refer Section [5] on Pg [11] above. Warning/notice for every valid complaint below threshold. 1st violation - 15-day barring of resources for valid complaints above threshold. 2nd violation - Disconnection and blacklisting.

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. Complainant Number
- d. Header/number from which UCC is received
- e. Unique reference number
- f. Description text as captured during the registration of complaint
- g. Reference number mentioned in complaint, if any.
- h. TAP Name
- i. TAP Service Area
- j. Complaint registration channel
- k. Mode of UCC
- l. Category of UCC if available
- m. Reason for rejection, if any
- n. UTM/RTM
- o. OAP name
- p. OAP LSA

2. By OAP, after investigation – the OAP shall share the following additional information:

- a. Date of UCC referred to OAP
- b. CDR status (Matched/Not Matched)
- c. Action Taken
- d. Date of action taken
- e. Status

Section V. Amendment to CoP

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

- a. Wherever there is an Amendment/Direction issued by the Regulator that requires commensurate changes in this CoP.
- b. Wherever RJIL, together with industry partners, finds requirement of an amendment within their rights as per the co-regulatory approach of the guiding Regulations.
- c. It is understood that the Codes of Practice (CoPs) may stipulate some 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 the concerned TSPs well before actually implementing the same.

Section VI. Publication of CoP

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

Section VII. 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 and appurtenances thereto, as amended from time to time.

Section VIII. Version History

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

S.no	Date	Version	Remarks
1.	16.10.2018	1.0	CoP-Complaints RJIL-base document
2.	07.02.2020	1.1	Reviewed before publication on Jio.com
3.	12.01.2021	1.2	Reviewed in line with the recent implementations
4.	10.05.2021	1.3	Reviewed basis comments from the TRAI
5.	05.08.2024	1.4	Reviewed basis TRAI Directions dated 24.06.2024
6.	28.02.2026	1.5	Reviewed in line with recent Directions and the TCCCP (Second Amendment) Regulations 2025