

Code of Practice for Entities (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) dated 19th July 2018 ('TCCCP Regulations 2018'), and appurtenances thereto, as amended from time to time.
- 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.
- III. That in the event of any conflict or inconsistency between any provision of the TCCCP Regulations, 2018, and appurtenances thereto, as amended from time to time, and this CoP, the provisions of 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 provided by Reliance Jio Infocomm Limited ('RJIL') shall be final and binding.
- IV. This CoP is the outcome of mandate given in TCCCPR-2018 and its subsequent amendments and relevant directions and has evolved mostly with the joint initiative and concurrence of all the Access Providers.
- 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 laid down in the TCCCPR 2018, 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.

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Section I. Scope

The Scope of this CoP is to:

1. Comply with the TCCCP Regulation, 2018, and amendments thereto, and Directions associated with the same.
2. Effective control of Unsolicited Commercial Communication.
3. Provide for appointment of various Entities (internally managed within TSP or delegated to a partner entity) who would perform the respective functions assigned as per TCCCP Regulation and/or this CoP.
4. Cover process for registration of 'Sender(s)' (i.e. Principal Entities or Telemarketers) and their obligations, who will be assigned and allocated the headers (SMS or voice CLIs), Consent mechanism, Consent management tools, Content Templates, Whitelisting their URLs/APKs/CTAs, etc., Content and Header registration, validation, verification and scrubbing, etc.
5. 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

1. RJIL, at its sole discretion, may choose to perform the functions of various Entities on its own or may also choose to delegate the same to a third party.
2. If delegated to a third party:
 - a. RJIL shall ensure proper authorization of such Legal entity through legal agreements, which shall include strict conditions for safety, security and confidentiality of the information being made available over the DLT system.
 - b. RJIL shall ensure 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)
 - c. RJIL 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.
3. Entity Registration Functionality:
 - (1) All entities with associated functions, who will be carrying out given functions for effective control of Commercial Communications being delivered through them, shall be declared by RJIL on DLT, once they are registered;
 - (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 RJIL to ensure the effectiveness of Unsolicited Commercial Communications control to meet regulatory outcomes specified in the regulations;

- (3) Each functional entity shall be given unique identity by RJIL to be used to authenticate and track the events;
- (4) Three types of entities may register & get allocated with a Unique ID post registration namely Principal Entity, Telemarketer, Aggregator.
- (5) Only legal entities/ organizations can register as an “Entity” at DLT.
- (6) Details such as Organization name, Industry Category (Govt/ Private Ltd/ Public Ltd/ SEBI/ Others), PAN or TAN, Address, are mandatory at the time of registration which get stored on DLT.
- (7) The above information filled in by the entity at the time of initial registration with the access provider who becomes his Creator operator may be updated on DLT.
- (8) Any modifications to the above information at DLT have to be initiated by the entity with his creator operator.
- (9) During registration, an Entity has to upload their PAN / TAN document, proof of address & authorization letter and proof of authority, wherever required, which is further validated by the Entity-Registrar of the operator.
- (10) Proof of Identification (as agreed between all Access Providers) is the PAN / TAN & this is unique for an entity & his entity class (PE/TM/TA) across DLT.
- (11) The details mentioned by the entity & the documents uploaded at the time of registration are maintained by RJIL. For the secondary registration, existing PAN and entity ID available in DLT will be considered as unique identifiers.
- (12) In case of any issues observed during the registration validation by the Entity registrar, the request may be rejected and duly communicated to the entity with reasons.
- (13) Exceptional approvals may be granted for Government entities basis 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.
- (14) Entities are communicated on the registered email Id post validation by RJIL on both successful & unsuccessful registration on the DLT portal.

Section III: Types of Entities Registration and their functions:

There are several types of Entities which are to be appointed by RJIL, either to be done within organization or by way of 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. Entity Registrar

Functions of Entity Registrar

- (1) All entities with associated functions, who will be carrying out given functions for effective control of Unsolicited Commercial Communications being delivered through them, shall be registered on RJIL's DLT platform;
- (2) each functional entity shall be given unique identity by the Entity Registrar to be used to authenticate and track the events;
- (3) Every Access Provider shall formulate process and rules for registering various types of entities on the RJIL DLT portal
- (4) Carry out pre-verifications of documents and credentials submitted by an individual, business entity or legal entity requesting for entity registration;
- (5) Bind with a 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;

Entity Registrar shall have a functionality on the mobile app/website or any other mode, enabling Sender(s) to login securely and safely for using different services which RJIL may choose to provide through such mode.

The mobile app/website shall have authentication based on the registered mobile number and/or email id of the Sender. RJIL's DLT portal has the feature 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.

- a) **Process steps for Registration of Sender:** Post successful checks and documents availability as provided for in the registration page, the Entity Registrar will register the Sender and make respective entries in the system.
- b) **Process steps for De-registration of Sender:** The Entity Registrar will temporarily or permanently de-register a Sender in following scenarios:
 - i. In case of repeated complaints as defined in the complaint handling CoP.
 - ii. In case limited period has been mentioned in the Authorisation letter provided by Government agency or Corporate/well-known brand has expired, on manual/auto basis.
 - iii. Any other scenarios, as emanating from CoP-UCC Detect or as found appropriate, by RJIL, from time to time.

Such de-registration of Sender should be immediately informed to the respective Sender/Telemarketer on their registered email id, along with process of re-instatement as defined by RJIL from time to time.

2. Header Registrar (Entity – HR)

A. Broad Functions:

- a) establish and maintain header register as distributed ledger to keep headers, in a secure and safe manner, and make accessible relevant information for identifying the assignee at the time of request to carry out various functions, e.g. scrubbing function from the registered telemarketers for scrubbing, delivery function from telemarketer;
- b) carry out Header Registration Function;
- c) keep record of headers throughout its lifecycle, i.e. free for assignment, assigned to an entity, withdrawn, surrendered, re-assigned etc.;
- d) Once a header has been registered by a PE, it can be used only by that PE, also in different case formats to send commercial communication (Uppercase, Lowercase or mix case)
- e) keep record of header(s), header root(s) reserved for specific purpose. In case of voice header(s), header root(s) will refer to the dedicated number series specified for this purpose;
- f) synchronize records, in real time, among all header ledgers available with participating nodes in Header Registration Functionality in an immutable and non-repudiable manner;
- g) maintain with minimum performance requirements as specified;
- h) 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:

Assign header for SMS via Header Registration Functionality, on its own or through its agents, as per allocation and assignment principles and policies, to facilitate content provider or principal entity to get new headers;

Process for Allocation and Assignment Principles and policies:

- a. Total length of a SMS Header is 11 alphabets or numbers or alphanumeric. First two characters will be fixed as: first character indicates TSP, second LSA, followed by a hyphen '-'. Rest 8 characters or numbers are free and can be used for assignment.
- b. Sender will not have right or ownership on the header(s) allocated. In case of any dispute or otherwise, under pure discretion of RJIL, the assignment of header(s) can be revoked, with or without notice. RJIL under its discretion, can disallow allocation of any specific headers as well.
- c. The assignment of header(s) will be subject to the commercial terms as prescribed by RJIL.

- d. The Sender registration and/or headers assignment will be done by RJIL for its own resources, as per the process prescribed herein.
- e. The definition of Transactional, Service, Promotional, Government would be as detailed below.

Transactional Message or Transactional Voice Call means a Message sent or Voice Call made by a Sender to its Customer or Subscriber in response to Customer initiated transaction within thirty minutes of the transaction relating to any product or service such as OTP from banks, non-bank-entities like e-commerce, apps login etc., transaction alerts and confirmations, balance alerts post completion of a transaction, refund information, etc. and such Messages or calls are not promotional in nature and does not require Explicit Consent;

Sample transactional message:

- OTP message required for completing a net-banking transaction.
- OTP message required for completing credit/debit card transaction at a merchant location.

Service Message or Service Voice Call means a message sent or voice call made by a Sender to –

(i) its Customer or Subscriber to provide information pertaining to any product or service, its warranty, product recall, software upgrade alerts, safety or security of the product used or purchased by the Customer, periodic balance alerts, information regarding delivery of goods or services, and such Messages are not promotional in nature and do not require Explicit Consent; or

(ii) a Recipient to facilitate or complete a commercial transaction involving the ongoing purchase or the use by the Recipient of the product or services offered by the Sender after obtaining Explicit Consent from the Recipient and such Messages are not promotional in nature:

Provided that such Explicit Consent shall be for seven days or as directed by the Authority from time to time:

Provided further that a transactional Message or transactional Voice Call containing information pertaining to service shall be treated as a Service Message or Service Voice Call

Promotional Message: means the commercial communication containing promotional material or advertisement of a product or service:

Provided further that if promotional content is mixed with any type of Transactional or Service Message, such Message shall be treated as a Promotional Message.

Explanation: These Messages shall only be delivered to Subscribers who have not blocked their preference under the applicable category in the Preference Register. Once Digital Consent goes live, these messages may also be sent to subscribers whose Digital Consent will be available in the Consent database.

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Promotional Voice Call means commercial communication any voice Commercial Communication containing promotional material or advertisement of a product or service:

Provided that if promotional content is mixed with any type of commercial Voice Call, such voice call shall be treated as a Promotional Voice Call.

Explanation: These calls shall only be delivered to Subscribers who have not blocked their preference, under the applicable category, in the Preference Register or have given their Consent in the Consent Register, as applicable. Once Digital Consent goes live, these messages may also be sent to subscribers whose Digital Consent will be available in the Consent database.

Government Message or Government Voice Call means any message sent or voice call made on the directions of –

(a) the Central Government or the State Government or any body established under the Constitution; or

(b) the Authority or by an agency expressly authorized for the purpose by the Authority: Provided that such messages are sent or voice calls are made through the DLT platform.

Explanation: There shall not be any requirement of seeking Consent for receipt of these communications nor shall there be any option in the Preference Register to block such communications.



Illustrations:

i. Customer doing Banking transaction (like payment through credit/debit card at a Merchant location, Net Banking transaction)

1. Transactional Message: OTP message required for completing such Net-banking transaction
2. Transactional Message (inferred consent): Confirmation messages of a Net- banking transaction.
3. Transactional Message: OTP message required for completing credit/debit card transaction at a Merchant location.
4. Service Message (inferred consent): Confirmation messages of such credit/debit transaction.

ii. Customer purchasing product from E-Commerce Mobile app/website

Transactional Message: Customer makes the payment through Net- Banking over E-Commerce website/mobile app and an OTP is sent to complete the transaction.

1. Service Message (inferred consent): Product purchase confirmation, delivery status.
2. Transactional Message: (inferred consent): Customer makes the payment through Payment Wallet over E-Commerce website/mobile app and an OTP is sent to complete the transaction.

iii. Sample Service messages with no promotional content (Inferred consent)

a. Banking

1. Account statement alerts
2. Balance in Account: XXXXXXXXXXXXXXX is -8046.15,
3. Dear SBI Cardholder, your current available limit is Rs.7,017.81. Pls call us at 18601801290/39020202 for information on credit limit.
4. SB/CA AccountXXXXXXXXXXXX has gone below minimum balance requirement on 24/01/2017. Total Avail.bal INR 223.09. Minimum Balance Information Msg
5. Dear Customer, We have upgraded UPI, Kindly Reset/generate your UPI pin by entering ATM card details first. Inconvenience regretted. Bank will NEVER telephone you to verify this password. Password for Upgrade Access Level is: 94743003. Do not give it to anyone.

b. E-Commerce and Logistics

- We are delighted to inform you that Order No.HKA-29896-11700985 has been delivered.
- Dear Customer, ur Order was returned to us undelivered. Ur 1 Yr Free Shipping subscription is cancelled. Subscribe again to avail benefits.T&C
- Your order from <Name of Brand> with Blue Dart Awb# 69630540954 is undelivered due to address related issues. Please call 1860 233 1234 from 9am-9pm Mon-Sat.
- Exchange order undelivered: We were unable to deliver your exchange order for <Name of product>. We will attempt again.

c. Others:

- "Dear Customer, Power Supply in your area may get interrupted



between 10AM-6PM on 10-10-2018 due to Maintenance shutdown. Inconvenience is regretted. Team BRPL”

- “Your SIP Purchase in Folio _____ under HDFC Hybrid Equity Fund-Dir-Growth for Rs. 4000.00 has been processed at the NAV of _____ for _____ units (with applicable load, if any)”
- Dear 6E Customer - Get online or get in line. Web check-in now. Just carry a print of your boarding pass and drop your bags at bag drop counters or proceed straight to gates.
- Your Bus has been delayed by 44 minutes in departure and may cause delay in arrival. Inconvenience is highly regretted.
- Sorry. Your ride with CRN 2346066642 has been cancelled. We apologize for the inconvenience.
- Hi, your Health Quote 201701175954 will end tomorrow. Visit <website> to buy now or call on <Number>
- <Institute Name> RC DELHI-3 Dear NEHA, you are requested to visit <Institute Name> Regional Centre, Dwarka from 24th to 25th Jan, 2017 to collect your study material (Jan Session, 2017) for MCOM2 Prog. Kindly bring your original student Identity Card with you.
- NOTICE Dear Parents, it is for your kind information that educational tour of GNPS is planned to move on 11th October 2018 at 16:00 hours (4 PM)
- The cheque/ECS/NACH of Rs. 25007.00 deposited under loan no. 610600001353 is bounced. Kindly make the payment immediately. Ignore if already paid.
- <Brand name> Alert Loan application of <Name of customer> has been sanctioned. Regards, <Brand Name>
- OTP for Home Credit loan application is 847871. Please enter the same to complete your transaction. Do not share OTP with anyone for security reasons.
- Your loan application no SF86372542 has been approved. Amount will be disbursed in 48 working hours post submission of all documents. Regards, <Brand Name>
- Your <Name of brand> credit card has been dispatched by Blue dart courier AWB no _____. You can track on www.xxxxx.com or contact customer care number yyyyyyyyyy. For more details please visit our website www.abccabc.com or contact to our toll free number _____
- Dear Customer, recharge your <D2H service provider> d2h id abccabcabc before or on 02-Aug-18 to enjoy uninterrupted services.

iv. Sample Service Explicit/Promotional Messages with promotional Content (Service messages with Explicit Consent or Promotional messages to non-DND subscribers):

- Download the Goibibo App, SignUp & Get ready to Earn loads of goCash+ & Save Big on your Travel Bookings <https://go.ibi.bo/d/BcJwOpgE3Q>
- Book Ads In <Brand Name> at lowest cost. Visit abccabc.com or call xxxxxxxxxx. More Than 5 Lakh Happy Customers Served. Use code xyzxyz for 10% off
- You started a consult with DocsApp but didn't go through with it. Use COUPON CODE 31OFF to get FLAT 31% OFF on your consult - EXPIRES TODAY <http://nmc.sg/jQ5uVg>
- Hey Eldho Jacob. Want to buy the medicines that Dr. abccabc prescribed? Order on xyzApp to get upto 20% Off and Free home delivery. Click <http://doitnow.xx>
- Make this festive season even more special with No mkg on Diamond Jwlr, Rs.225/gm mkg on gold jwlr & 10% off on Jadau jwlr only@<brand>

name>.T&C

- Lunch @ 60% off is bae! Use code TREAT60. Max discount Rs.80. Valid till 4 pm on the <Brand name> app. Order Now! Click Here --> goo.gl/

For the purposes of sending messages to its own subscribers, RJIL will register over DLT and undergo registration process under this CoP, but RJIL headers and templates may/may not be pre-registered over DLT at all times as there may be some portion of RJIL's own traffic that may not be getting processed through the DLT platform for operational/other reasons. As the connection by itself is a part of service opted for by customer, RJIL can send Commercial messages to its own customers without seeking separate consent.

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

- a) The Sender has to submit request for registration by logging in their PE account in the DL, filling up a simple online request form, mentioning the header(s) required in the format prescribed.
- b) In case of Government agencies approaching directly Entity-HR, the KYC documents will not apply. In case a Registered Telemarketer (RTM) with RJIL, approaches on behalf of Government agencies then, an undertaking would have to be furnished by said RTM that the header will be used for said Government agencies SMS only. It is to be noted said header will be registered in name of Government agency only. In case of Central & State Government, bodies established under Constitution, TRAI (if it directs), and any agency authorized by TRAI, the TAP will not bill to OAP Service SMS charge of Rs.0.05/- SMS. However, the SMS termination charge as defined under TRAI Regulation would continue to apply (presently @ Rs. 0.02/- SMS).
- c) RJIL shall check that the header(s) should be related to company name or initial alphabets of the words in the company name or the business/sector to which company belongs to or the brand name such Sender holds. In case the header does not fall into any of these categories, the Entity-HR to check whether the header can have a correlation with any of the Government entities/projects, well known brands, corporates, eminent personalities, political parties, renowned groups/associations, objectionable keywords, abuses, derogatory remarks, etc. If there is no correlation with the list, then the request can be taken forward else to be declined.
- d) carry out additional, reasonable 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;
- e) 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 specifically in case of government entities, corporate(s), 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;

Process steps for Additional checks for look-alike headers:

- a. Data set for this is the well-known brand names, corporates, eminent personalities, political parties, renowned groups/associations, etc.

b. Above to be done on a best-effort basis.

f) Process steps for Registration of Header: Post successful checks as per above sub-clause , the Entity-HR will assign the header and make respective entries in the system.

g) Process steps for De-registration of Sender and/or Header: The Entity-HR will temporarily or permanently de-register a Header in following scenarios:

- a. In case of repeated complaints as defined in the complaint handling CoP.
- b. In case limited period mentioned in the Authorisation letter provided by Government agency or Corporate/well-known brand has expired, on manual/auto basis.
- c. Any other scenarios, as emanating from CoP-UCC Detect or as found appropriate, by RJIL, from time to time.

Such de-registration of Header(s) should be immediately informed to the respective Sender/Telemarketer on their registered email id, along with option of re- allotment as defined by RJIL from time to time.

h) Depending upon technical feasibility, RJIL may choose to allocate naming feature to be displayed as CLI (CNam) for commercial voice calls made to its own subscribers.

i) Process Steps in case Header already allocated: There could be following scenarios:

- a. In case, a header is already allocated to an entity and a different, seemingly bonafide entity approaches the TSP later for the header or for preventing the other entity from using it, RJIL may withdraw or re-allocate the header.
- b. In case, two entities at one point of time seek a particular header

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

2. Consent Acquisition Registrar (Entity-CsAR)

(It may be noted that the Consent Functionality is under a complete revision and a new approach is being developed in consultation with the TRAI and leading Banks and FIs. This CoP will be amended suitably after successful completion of the Pilot with the above parties)

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) register and whitelist URL/APK/OTT Links/CTA/Call back numbers as submitted by the Sender in their DLT account, under digital undertaking for their bona fide usage

- 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 will share with Entity-CTR the proposed template to be registered under the category of transactional or service message, as the case may be. The template should carry both fixed and variable portion, distinctly identified. Sender will also share a sample content to indicate the desired values of the variable portions in the requested template.
- 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. RJIL will remain indemnified for any such misuse by sender/aggregator.
- iii. Entity-CTR will cross check the content of all commercial message templates.
- iv. All content templates should have Brand/Trademark/Entity name in the template so that templates are not abused
- v. RJIL under its discretion, can disallow registration of any content template based on any specific keywords or otherwise.
- vi. Senders will submit URLs/APKs/OTT Links/CTAs/Call back numbers which they intend to use in all their commercial communications in the CTA Whitelisting module. Only those URLs/APKs/OTT Links/CTAs/Call back numbers whitelisted therein will be allowed to be sent in the messages sent by the respective sender. No such URLs/APKs/OTT Links/CTAs/Call back numbers which have not been whitelisted as above will be allowed to be sent/delivered.
- vii. The Scrubbing mechanism in the OAPs' DLT systems to ensure no messages with URLs/APKs/OTT Links/CTAs/Call back numbers which have not been pre-whitelisted as above are allowed to be sent to any subscribers.

Sample template for registration:

- viii. Your Mobile No<variable>Recharged successfully with amount<variable>and your current balance is<variable>
- ix. Thank you from XXXXX <variable>Check Status using Track ID<variable>Your Order Details<variable>Recharge Rs<variable>for<variable>of<variable>
- x. Thank You for your registration for Core Event on<variable>We regret to inform your seat is not<variable>. Please register for the event online so you won't <variable>miss it.

- xi. Your transaction to <Variable> of amount <Variable> is <Variable> Thank you for using TNT Service <Variable> Transaction No <Variable>

- b) 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 30% of the total length. Also, there shall be no more than 2 consecutive and 3 overall variables in the template. Any exceptions to this percentage threshold to be approved by RJIL on merit.
- c) To de-register template or temporarily suspend use of template;

Process Steps:

- i. Entity-CTR may de-register/ temporarily suspend use of a content template 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 period of 180 days (optional).
 - c) As per inputs arising from CoP Detect or otherwise as per discretion of RJIL.
- d) 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;
- e) To check content of the template being offered for registration as 'promotional' from the perspective of content category;

Process Steps for checking content of template:

- i. Sender to categorise the template message into promotional category if the same falls under the definition of promotional message as defined in this CoP. Entity-CTR to do the necessary check and same will be applicable for the subscribers of RJIL, who has appointed the said Entity-CTR.
- ii. In case the entity wants to send promotional messages via DND Preference scrubbing, digital consent is not required. Digital Consent will be required to be associated with a promotional content template only if the sender wants to send the proposed template against such digital consents. ***(the framework for Digital Consent Registration is under development and relevant portions in this CoP will be amended suitably once it goes live).***
- f) Assigning unique template identity to registered template of content;

4. Telemarketer functional Entity Registrar (Entity-TFER)

A. Process Steps:

- i. RJIL itself or through an entity (Entity-TFER) may 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 RJIL.

- ii. These Telemarketer functional entities will perform respective functions as mentioned hereinafter.
- iii. It is in complete discretion of RJIL to appoint and register one or multiple entities as TM-SF.
- iv. RJIL may formulate process and scenarios for de-registration of Telemarketer Functional Entities

5. Telemarketers for Various Functions

A. Functions of Entity-TM-SF

Process Steps for processing Scrubbing:

- i. The Telemarketer or Sender submits target numbers, headers and template for the scrubbing function.
- ii. For Scrubbing function can be for either category of message i.e. promotional and service.
- iii. The Scrubbing function would mean checking of customer's preference or digital consent*, depending upon the message being promotional or Service respectively. The TSP 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.
- iv. The Telemarketer or Sender will provide the MSISDNs and content of message along with the category of content (i.e. promotional or service) to the TM-SF as per the format prescribed by RJIL /TM-SF.
- v. The TM-SF will scrub the promotional message with the Preference register and the Digital Consent Register* (including checking the preferred time slots and types of days for delivery)
- vi. Similarly, TM-SF will scrub the service explicit message with the Consent Register
- vii. 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;
 - a) The broad rules for such identification shall be fixed by TM-SF and OAP from time to time.
 - b) Once identified, TM-SF should report such instances to Entities-HR, for further necessary action.

B. Functions of Entity-TM-DF

To deliver messages to OAP, in a secure and safe manner, after due validation and security checks.

C. Functions of Entity-TM-AF

- 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;

D. Telemarketer for voice calling function (TM-VCF)

- a) to carry out voice calling function;
- b) take necessary measures to protect Preference Register and Digital Consent Register* data during voice calling, 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 those authorized to know it;
- c) maintain with minimum performance requirements as specified;
- d) perform any other function and keep other relevant details which may be required for carrying out pre and post checks for regulatory compliance;

Section IV. Consequence management

1. RJIL as a TAP can disallow termination of commercial communication on its subscribers, if the necessary DLT system and processes has not been implemented by an OAP (other TSP) as per the requirements and timelines provided in the TRAI's regulation.
2. In case of default/breach in functions to be performed by respective Entities registered/appointed by it, RJIL may take strict action against the same which may include warning notice or show cause notice or penalty or temporary/permanent termination etc.
3. RJIL may formulate an internal process on above.
4. Action of blacklisting can be taken against Telemarketer or aggregator performing the SMS or voice delivery function. For this, the TSP taking action of blacklisting should inform other TSPs along with details of default. The other TSPs then should examine the case and take further necessary action.



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

Following information should be handed over by a TSP to all other TSPs on the DLT systems:

1. Sender
 - a. Sender Registration ID
 - b. PAN/TAN
 - c. Sender Name and Address
2. Header
 - a. Header(s)
 - b. Date-Time of registration
 - c. Purpose (Transactional, Service, Promotional or Government)
 - d. Linked Sender
3. Consent Register*

(the framework for Digital Consent Registration is under development and relevant portions in this CoP will be amended suitably once it goes live).
4. Content Template
 - a) Sender Registration ID and Name
 - b) SMS header linked with the template
 - c) Content Template text
 - d) Fixed portion and Variable portion
 - e) Date of registration
 - f) Associated category
 - g) Template Type
5. URL/APK/OTT Links/CTA/Call back numbers
 - a) Sender Registration ID and name
 - b) URLs/APKs/OTT links/CTAs/Call back number whitelisted in the Sender account

Section VI. 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 VII. Publication of CoP

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

Section VIII. 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 IX. Version History

S.No.	Date	Version	Details
1.	16.10.2018	1.0	CoP-Entities_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.	16.05.2022	1.4	Reviewed for definitions of different types of SMS
6.	13.09.2024	1.5	Reviewed in line with recent Directions
7.	28.02.2026	1.6	Reviewed in line with recent Directions and the TCCCP (Second Amendment) Regulations 2025 and subsequent Directions