

Subject: **Fwd: Consultation Paper on UCC (Netcore Solutions Pvt Ltd)**

To: Rajender Kumar Sharma <rajender@traf.gov.in>,
pkg20672@gmail.com, trishna.dot@gmail.com

Date: 11/13/17 12:39 PM

From: "Asit Kadayana, Advisor" <advqos@traf.gov.in>

signature.jpg (66kB)

----- Original Message -----

From: **Nikhil Singh** <nikhil.singh@netcore.co.in>

Date: Nov 13, 2017 11:34:41 AM

Subject: Consultation Paper on UCC (Netcore Solutions Pvt Ltd)

To: advqos@traf.gov.in

Cc: Sunil Gupta <skgupta2009@gmail.com>

Dear Sir

Please find below our suggestion for TRAI Consultation Paper on UCC .

1. Complaints

(i) Fake complaints: The process for registering a complaint should be made robust to avoid Fake complaints

a. End User should have tried to de-register, unsubscribe atleast 3 times before registering a complaint using MO - SMS, Missed call, email within 48 hours prior to raising a complaint

b. if 1.a. is already done then complaint to be registered and forwarded to Telemarketer / Brand for provisioning opt-in proof via online mechanism

c. if the end user claims that there is no way to do 1.a. then Telemarketer or brand should be notified and give that information to the user to de-register, unsubscribe

(ii) Universal SMS opt-out: There should be a global provision where end user can send an SMS to a long code with format STOP <brand sender ID>

a. Once user sends SMS to global OPT-out for a specific sender ID, all Telemarketers should receive an automated notification that this SMS user should be blocked for the Sender ID mentioned in the SMS [Comment: what happens if the end user wants to receive promotional messages of one kind but not of another and both these types are sent by one telemarketer? For instance, Netcore sends messages for its clients for various things. Netcore could be sending messages on building projects on the one hand and could be sending messages on food coupons for another client. There could be an instance that an end user (who is getting both these types of messages) might want the messages for the building projects but not the food coupons and they de-register their no. for the food coupon messages, and Netcore receives that request, I am presuming you will not block the end user from all your communications?]

b. Telemarketer to forward this notification to the brand.

c. All users not in DND or who haven't sent SMS to opt-out should be flagged as available to receive SMSes from the said sender ID

(iii) Users should be able to report via SMS a mobile number/long code/landline number from where they have received UCC using format "UCC <mobile number> <call/SMS> <brand if any>"

2. Opt-in proof

a. There should be an online portal where opt-in proof can be uploaded directly by the brand. Telemarketer to get the brand to provision the same. [Comment: I have observed that clients in the financial sector are not willing to provide separate opt-in proof when they enter in to an agreement with Netcore, since, according to them the opt-in is received at the time of account opening/investment. I am sure, clients in the financial sector will not upload any such information on any portal for security purposes. How do you think this can be tackled?]

b. There should be a standard format of provisioning the opt-in proof across brands so ensure uniformity.

3. Calls and SMSes from Long codes

- a. Operators should have a mechanism in place to block if more than <25> SMSes are sent from a long code or a mobile number in 24 hours.
- b. Operators should have a mechanism in place to block if more than <25> calls are made from a long code or a mobile number in 30 mins.

4. Registration of Aggregators as Telemarketers and Brands as Semi-Telemarketers

- a. All Brands using Telecommunication as method of communication should be registered as Semi-Telemarketers
An online system for registration should be created where they can use payment gateway to make payments to register
- b. Telemarketers can register more than 1 entity under umbrella brand
- c. All Semi-Telemarketers should be liable for all penalties for sending UCC.
- d. Online payment options should be made available
- e. Automated blocking of accounts by service providers must be made available
- f. As a mandate all Semi-Telemarketers should register with Telemarketers (No Semi-Telemarketer should register with super aggregator as a mandate)

5.USSD

Trai Should mandate operators to open up and terminate USSD like sms.

Warm Regards,
Nikhil Singh
Group Manager
Netcore Solutions Pvt Ltd
M:8860511666

[MailScanner Signature](#)

—signature.jpg—



RE-ENGAGE UP TO 55% OF WEBSITE VISITORS
Get Started with **Browser Push Notifications**

netcore[®]
Experience the Infinite

[Download eBook](#)