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TRAI/FY 26-27/05
April 19, 2026

To,
Sh. Deepak Sharma,
Advisor (QoS-II)
Telecom Regulatory Authority of India,
Tower F, World trade Center,
Nauroji Nagar,
New Delhi 110029

Sub: Response to TRAI Consultation Paper on “Draft Telecom Commercial Communications Customer Preference (Third Amendment) Regulations, 2026.”

Ref: TRAI Consultation Paper dated March 13, 2026.

Dear Sir,

In reference to the captioned consultation paper, we are pleased to enclose our response for your perusal.
We hope that our submissions will merit your kind consideration.

Thanking You
Yours Sincerely
For Bharti Airtel Limited

A handwritten signature in blue ink, appearing to read 'Rahul Vatts', is written over a light blue circular stamp.

Rahul Vatts
Chief Regulatory Officer
Encl: As mentioned above.

Copy to:

- 1. Chairman, TRAI**
- 2. Secretary, TRAI**
- 3. Principal Advisor (QoS), TRAI**

Preamble

1. Airtel thanks the Authority for inviting comments on the proposed amendments to the Telecom Commercial Communications Customer Preference Regulations, 2018 (“TCCCP”). Airtel commends the Authority’s continued consultative, transparent, and technology-forward approach towards strengthening the regulatory framework for curbing Unsolicited Commercial Communication (“UCC”) and safeguarding consumer interests in an evolving digital communications landscape.
2. In the last few years, Airtel has undertaken several industry-leading initiatives to curb spam and fraudulent communications within its network. We have invested significantly in network-level filtering solutions, AI-driven fraud detection systems, customer alert mechanisms, and strengthened compliance frameworks aligned with evolving telecom regulations. Over the last 1.5 years alone, Airtel’s AI-powered spam detection initiatives have blocked more than **82.5 billion spam calls** and **3.4 billion spam SMSs**, contributing to a **68.7% reduction in financial losses from fraud on our network**. These initiatives reflect our continued commitment to protecting consumers and strengthening trust in India’s digital ecosystem.
3. In parallel with its efforts, Airtel has actively pursued collaborative solutions with global technology platforms to extend customer protection across the broader communication ecosystem. **Most recently, Airtel and Google announced a partnership to enhance the safety of Rich Communication Services (RCS) messaging for millions of users in India. This collaboration combines Airtel’s network intelligence and AI-driven spam detection capabilities with Google’s RCS platform and spam filtering technologies to deliver a more secure and trusted messaging experience, while enabling advanced features such as high-quality media sharing and interactive messaging.**
4. Importantly, this partnership extends telco-grade safeguards beyond traditional telecom messaging by incorporating protections such as sender verification, spam detection, malicious link filtering, and enforcement of user consent preferences into newer messaging channels. It represents a clear example of how telecom operators and global technology platforms can work together to apply comparable safety, verification, and accountability standards across communication services.
5. While these efforts, supported by progressive regulatory action by the Department of Telecommunications (DoT) and the Telecom Regulatory Authority of India (TRAI), are delivering measurable improvements within the licensed telecom ecosystem, they have also revealed a structural vulnerability that now requires urgent policy attention - malicious actors are increasingly shifting their activities to analogous digital communication platforms, particularly OTT-based messaging and calling applications that operate outside comparable regulatory oversight. Consequently, gains achieved within the telecom ecosystem risk being diluted by vulnerabilities in adjacent, less regulated platforms.

6. This is verified by **findings of the General Anti-Scam Alliance (GASA), which indicate that 86 % of fraud attempts in India over the past year have shifted to OTT communication platforms offering messaging and calling functionalities.**
7. This regulatory imbalance weakens the communications ecosystem as a whole. Telecom operators are held to stringent compliance standards and continue to invest heavily in advanced safeguards, while fraudsters simply circumvent these safeguards by shifting to less regulated platforms where minimal oversight allows scams to reach consumers with ease.
8. **Therefore, where platforms perform equivalent communication functions, they should be subject to the same baseline, technology-agnostic obligations. These should include proactive scam detection, cooperation in threat intelligence sharing, prompt takedown of fraudulent content and accounts, and accountability for repeat abuse.**
9. Collaboration is equally critical. Telecom networks offer cross-channel visibility at scale, while digital platforms possess granular user-level insights and interface controls. Integrating these capabilities is essential for effective fraud prevention.
10. In this context, we believe it may be timely to consider the formulation of a **robust regulatory framework** that applies proportionate, risk-based, and enforceable safeguards across all platforms offering communication services in India, irrespective of the underlying technology.
11. Such a framework should:
 - Ensure equal accountability across telecom and OTT communication service providers;
 - Mandate baseline fraud-prevention safeguards across platforms;
 - Enable coordinated intelligence-sharing and rapid response mechanisms;
 - Reduce regulatory arbitrage that currently incentivizes the migration of fraudulent activity; and
 - Strengthen India's broader digital trust architecture.
12. Importantly, such an approach would not inhibit innovation. Rather, it would ensure that innovation and consumer protection evolve together, preventing the creation of safe havens for malicious activity. Fraud will only become economically unattractive when **every channel is subject to comparable safeguards and monitoring**. Fragmented or siloed regulatory approaches, however well-intentioned, risk perpetuating displacement rather than achieving deterrence.
13. In addition to the above, the Authority, through the present consultation, has introduced certain critical measures in the extant regulatory framework aimed at curbing spam. Airtel broadly welcomes these initiatives, subject to the condition that they do not adversely impact the existing ecosystem or create unintended distortions. Key aspects are as follows:

i. Introduction of definition of A2P based communication:

Airtel appreciates the Authority's move to introduce a definition for A2P-based communication. This is a significant step towards restoring regulatory clarity and integrity, safeguarding consumer interests, and ensuring that enterprise-originated traffic enters telecom networks in a secure, traceable, and accountable manner.

ii. Shift from Complaint-Based to Proactive Enforcement

Airtel strongly aligns with the Authority's objective of adopting robust, technology-driven measures to combat spam and UCC. Airtel remains committed to strengthening consumer protection and enhancing trust in telecom networks.

However, Airtel submits that any regulatory enforcement based on AI/ML systems must be evidence-based, proportionate, and aligned with the confidence levels generated by such systems. Enforcement actions should be limited to high-confidence cases, supported by strong and corroborative indicators of spam behavior, so as to ensure accuracy, defensibility, and minimization of false positives.

Further, to avoid fragmented implementation and ensure uniformity across stakeholders, it is essential to establish industry-wide alignment on the criteria and thresholds for classification of "high-confidence" suspected spam.

iii. Introduction of Deterrent based charging in A2P based voice communication:

Airtel welcomes the proposal to introduce deterrent-based charging as a necessary step towards curbing misuse of voice channels. Considering that, unlike SMS, the cost of operating of voice over networks is significantly higher, owing to factors such as higher network resources, dedicated infrastructure investments, and real time interaction, Airtel submits that the Authority should mandate a deterrent charge of ₹0.50 per minute for all A2P/commercial voice calls, payable by Originating Access Providers (OAPs) to Terminating Access Providers (TAPs), in line with the existing framework for SMS.

A significant share of spam calls (43%) is extremely short and non-meaningful, often lasting less than 10 seconds. Therefore, to deter the growing misuse of voice channels through high-volume, short-duration spam calling. Airtel proposes the introduction of a charge of ₹0.05 per call attempt to effectively discourage such abusive patterns.

However, Airtel expresses serious concern regarding the proposed exemption of the 1600xxx and 140xxx numbering series and unequivocally opposes the same. At present, all categories of commercial SMS, whether promotional, service or transactional, are subject to uniform interconnection charge of Rs. 0.07, ensuring a level playing field and regulatory consistency.

Extending an exemption to select voice numbering series would create an unjustified disparity between communication channels. Therefore, voice communications, irrespective of numbering series or classification, must be subjected to uniform charging to preserve regulatory parity, prevent arbitrage, and ensure equitable treatment across services.

Further, the proposed exemption for certain categories of entities, including financial institutions, is not justified. These entities account for a significant share of traffic and remain susceptible to misuse. Any differential treatment would be inconsistent with the principle of a level-playing field and should therefore be withdrawn.

Summary:

- ✓ *TRAI to introduce A2P and P2P based communication segregation.*
- ✓ *TRAI should introduce deterrent charges of ₹ 0.50 on commercial voice calls in order to address the growing misuse of voice channels for UCC.*
- ✓ *TRAI should introduce charges of ₹ 0.05 on call initiation in order to address the growing misuse of voice channels for UCC.*
- ✓ *TRAI to extent deterrent charging on call attempts and termination to 1600xxx and 140xxx series as well.*
- ✓ *A hybrid framework combining AI/ML-led detection with a strengthened, complaint analysis mechanism will enable effective and evidence-driven spam control.*
- ✓ *An additional deterrent charge of ₹0.04–0.05 per domestic commercial SMS, over existing charges, is essential to discourage spam and promote responsible messaging practices.*
- ✓ *Extending regulatory oversight to OTT and third-party communication platforms is necessary to close existing gaps and ensure uniform consumer protection.*
- ✓ *The proposed appeal mechanism requires further deliberation due to implementation challenges and should be introduced only after clear processes and industry alignment are established.*
- ✓ *Financial disincentives should be primarily enforced at the TSP registering header/template at the registration stage to prevent misuse at the source.*

In the remainder of this document, please find Airtel's clause-wise response to the draft Amendment.

Sr. No	Reg. No.	Sub reg.	Modification proposed to the draft amendment	Reasons/full justification for the proposed modification
1.	2	(ea)	<p>A2P (Application-to-Person)” call refers to a voice call that is initiated by an application, software system, or automated platform without direct human dialing and delivered to an individual telecom subscriber, including using autodialing, robo-calls and/ or prerecorded/ artificial voice technologies;</p> <p>provided that the use of autodialing or similar technologies shall not, by itself, be determinative of A2P classification, as such this technology may also be used for human-initiated calls in the ordinary course of communication.</p>	<p>Airtel appreciates the Authority’s move to introduce a definition for A2P-based communication. This is a significant step towards restoring regulatory clarity and integrity, safeguarding consumer interests, and ensuring that enterprise-originated traffic enters telecom networks in a secure, traceable, and accountable manner.</p> <p>However, the definition requires further clarity regarding scenarios where a human initiates a call to a subscriber using an A2P mode. In its current form, the definition may inadvertently classify all application-assisted communications as automated, thereby overlooking legitimate use cases where a human agent utilizes an application or autodialing system purely as an enabling tool to establish communication.</p> <p>Hence the definition is tweaked accordingly.</p>
2.	2	(y)	No Changes Proposed	Airtel is aligned with the proposed definition and does not seek any modifications. The definition, as proposed, is appropriate and sufficiently captures the intended scope without necessitating further clarification or refinement.
3.	2	(ai)	No Changes Proposed	Airtel is aligned with the proposed definition and does not seek any modifications. The definition, as proposed, is appropriate and sufficiently captures the intended scope without necessitating further clarification or refinement.
4.	2	(ba)	“Regulatory Sandbox” means specifically constructed experimental space, with a safe	Airtel supports the removal of the term “live” in the context of the Regulatory Sandbox. The testing envisaged under the sandbox framework is not conducted in a live

			<p>environment, within which various stakeholders can use Regulatory Technology solutions to develop and refine Code(s) of Practice to comply with new regulatory requirements; means a live testing environment, where new products, services, processes, regulatory technology solutions and business models may be deployed for a limited set of eligible customers, for a specified period of time, with certain relaxations in the extant regulatory provisions in order to encourage and facilitate innovation and technological development in telecommunication; development and refinement of Code(s) of Practice; and provide inputs for regulatory interventions and modifications.</p>	<p>network environment but within a controlled test environment under monitored conditions. Retaining the term “live” may lead to ambiguity and misinterpretation regarding the nature of such testing.</p>
5.	2	(bb)	<p>“Relationship” means a prior or existing relationship</p> <ul style="list-style-type: none"> i. for business or commercial reasons, between a person or entity and a subscriber with or without an exchange of consideration, ii. on the basis of the purchase or transaction made by or done by the recipient with the sender within the twelve months immediately preceding the date of the communication; or ii. (iii) on the basis of inquiry or application regarding products or services made by or submitted by recipient to sender within the three months immediately preceding the date of the receiving of communication, which relationship has not been previously terminated 	<p>The definition requires modification to provide clarity on scenarios where a customer disengages or drops off during a service journey. Specifically, it is unclear whether such a customer can be contacted after 7 days within the overall period of 3 months, as envisaged under the definition of “Service Message.”</p> <p>In the absence of explicit guidance, differing interpretations may arise regarding the permissibility and frequency of follow-up communications in such cases. Therefore, the definition should clearly specify whether re-engagement communications to customers who have dropped off mid-journey are permitted after a cooling-off period (e.g., 7 days), and how this aligns with the outer limit of 3 months.</p> <p>Providing this clarity is essential to ensure consistent compliance, avoid regulatory ambiguity, and enable legitimate customer engagement without the risk of</p>

			by either party; (iv) for social reasons, between a person or entity and a subscriber with or without an exchange of consideration, by voluntary two-way communication, initiated from both sides at different points in time;	misclassification as unsolicited commercial communication.
6.	2	(Bh)	“Service message or Service 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 or voice calls 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 or voice calls 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;	Same as above.
7.	2	(bn)	No Changes Proposed	Airtel is aligned with the proposed definition and does not seek any modifications.
8.	2	(bo)	No Changes Proposed	Airtel is aligned with the proposed definition and does not seek any modifications.

9.	2	(bw)	No Changes Proposed	Airtel is aligned with the proposed definition and does not seek any modifications.
10.	3		No Changes Proposed, Authority to specify the classification framework.	<p>Classification of senders constitutes a critical element of the overall complaint handling framework. Accordingly, enterprises must be classified well in advance, based on the parameters prescribed by TRAI, to ensure that the complaint handling process remains seamless and is not impeded due to the absence of such prior classification.</p> <p>Accordingly, Airtel requests the Authority to incorporate and clearly specify the classification framework within the present amendment itself, so as to provide necessary regulatory clarity and enable seamless implementation of the complaint handling process.</p>
11.	4		No Changes Proposed.	The feasibility of segregating A2P and P2P calls is currently under evaluation. While certain technical and operational considerations are being examined, Airtel is broadly supportive of this approach in principle, as it would enable clearer classification, better regulatory oversight, and more effective control of unsolicited commercial communications.
12.	11	(4)	No Changes Proposed.	Airtel is aligned with the proposed changes and does not seek any modifications.
13.	21	(A)	Clause to be removed and replaced by a new one.	<p>i. Airtel reiterates its strong alignment with the Authority’s objective of taking firm, effective, and technology-driven action against spam and unsolicited commercial communication (UCC). Airtel remains fully committed to strengthening consumer protection frameworks and enhancing trust in telecom networks.</p> <p>ii. In this context, Artificial Intelligence and Machine Learning (AI/ML) have emerged as critical tools for identifying, classifying, and mitigating spam across</p>

				<p>communication channels. TSPs have already made significant investments in deploying advanced AI/ML-based systems for real-time detection of suspicious communication patterns.</p> <p>iii. However, given the probabilistic nature of such systems, it is essential that regulatory frameworks governing their use are carefully calibrated, proportionate, and safeguard consumer interests, particularly in avoiding wrongful action against legitimate users.</p> <p>iv. AI/ML-based detection systems inherently operate on probabilistic modelling, behavioral analytics, and pattern recognition, and therefore generate outputs across varying levels of confidence. Not all flagged instances represent confirmed spam activity, and there remains an inherent possibility of false positives, particularly in cases involving legitimate high-volume usage by enterprises or individuals. Accordingly, treating all AI/ML-flagged instances as actionable without differentiation may lead to over-enforcement and unintended consequences for genuine users.</p> <p>v. Indiscriminate regulatory action based on all AI/ML outputs, irrespective of confidence levels, can result in significant hardship to legitimate subscribers. Genuine enterprises and individuals engaged in lawful communication may face unwarranted restrictions, thereby disrupting business operations and customer engagement. This concern is particularly critical given that mobile connections today function as a core digital identity, enabling</p>
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				<p>access to banking, payments, e-commerce, and e-governance services. Any wrongful restriction, suspension, or disconnection of services can therefore lead to serious financial and operational consequences for consumers.</p> <p>vi. Further, large-scale action arising from false positives may create panic among customers, erode trust in telecom systems, and significantly impact user experience. Such actions may also trigger a surge in customer grievances and queries, potentially overwhelming customer care infrastructure of TSPs and affecting service delivery. It is therefore essential that regulatory measures are designed to minimize such risks and ensure that legitimate consumers are adequately protected.</p> <p>vii. In light of the above, Airtel submits that regulatory enforcement based on AI/ML systems must be evidence-based, proportionate, and aligned with confidence levels generated by such systems. Enforcement should be restricted to high-confidence cases, where there is strong and corroborated evidence of spam behavior, ensuring that actions are accurate, defensible, and minimize the risk of false positives. Additionally, to avoid fragmented implementation and ensure consistency across the ecosystem, there is a need for industry-wide alignment on the criteria for classification of high-confidence suspected spam.</p> <p>viii. In view of the foregoing, it is submitted that the TSPs, through the COAI, have already proposed a feasible and implementable approach for undertaking</p>
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				<p>effective action post detection of spam. The said approach is not being reiterated herein for the sake of brevity. In this regard, it is respectfully requested that the Authority may consider and accept the proposed framework to enable its expeditious implementation in the interest of strengthening spam mitigation efforts.</p> <p>ix. Airtel submits that an effective and sustainable framework for curbing spam and unsolicited commercial communication can be achieved through a calibrated combination of AI/ML-based detection and the strengthened complaint analysis mechanism proposed by the Authority. The integration of COAI’s proposed confidence-based approach, with enforcement focused on high-confidence cases and supported by a graduated response framework, alongside TRAI’s proposal to rationalize complaint thresholds, will create a robust, evidence-driven system for identifying and addressing spam.</p>
14.	22	(i);(ii)&(iii)	No Changes Required	Airtel is aligned with the proposed changes and does not seek any modifications.
15.	23	23 (1) (c)	<p>23. Every Access Provider shall establish Customer Complaint Registration Facility (CCRF) and shall make necessary arrangements to facilitate its customers on 24 hours X 7 days basis throughout the year: -</p> <p>(C)to appeal to the Appellate Authority within a period of 15 days from the date of receipt of information about the resolution of the complaint when the consumer is not satisfied with the redressal of the complaint by the Access provider, or the complaint remain unaddressed, or no</p>	<p>i. The Authority, in the Consultation Paper, has proposed the introduction of a formal appeal mechanism to enable consumers to escalate cases where they are dissatisfied with the resolution of their complaints. The proposal envisages that such appeals may be filed within a defined period of 15 days from closure of the complaint, and that these appeals should be mandatorily resolved within specified timelines. Further, the requirement to designate a senior-level Appellate Authority within TSPs has been proposed to strengthen governance,</p>

			<p>intimation of redressal of the complaint is received by the complainant within a period of fifteen(15) days from the date of registering complaint, whichever is earlier. The complainant shall be able to prefer such appeal through any of the modes specified for lodging a complaint or report under these Regulations. The Appellate Authority shall resolve and reply to such appeal within a period of fifteen (15) days from the date of its receipt. Every Access Provider shall designate a permanent employee working at senior management level as the Appellate Authority. The name and contact details of such designated officer shall be duly published at a prominent place on the official website of the concerned access provider;</p> <p>The timelines and process for filing and disposal of such appeals shall be as and when decided by the Authority, considering the operational and technical feasibility of Access Providers.</p>	<p>accountability, and oversight in complaint handling processes.</p> <ul style="list-style-type: none"> ii. While the objective of strengthening consumer protection is well appreciated, Airtel submits that the proposed framework, in its current form, presents certain technical and operational challenges that need careful consideration. In particular, the absence of a structured, technology-enabled appeal management system, especially within the existing DLT and complaint handling ecosystem, poses significant implementation constraints. iii. The current systems and workflows under TCCCP are primarily designed for complaint registration, processing, and resolution at scale. Introducing an appellate layer would require end-to-end system enhancements, including tracking of appeal timelines, linkage with original complaints, evidence re-evaluation, inter-operator coordination, and audit trails. In the absence of a standardized and interoperable platform to support such functionalities, there is a risk of fragmented implementation across TSPs, leading to inconsistencies, delays, and potential disputes. iv. Additionally, given the multi-operator nature of UCC complaint handling, where origination and termination may involve different networks, the appeal process would necessitate clear delineation of roles, responsibilities, and data-sharing protocols among stakeholders. Without a centralized or harmonized mechanism, ensuring
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				<p>timely and accurate resolution of appeals may be operationally challenging.</p> <p>v. The proposed appeal mechanism, while conceptually sound, requires a re-evaluation from a technical feasibility and ecosystem readiness perspective. Any such framework should be preceded by the development of a robust, tech-enabled, and industry-aligned platform that can seamlessly integrate with existing DLT and complaint management systems.</p> <p>vi. In view of the above, Airtel submits that the proposed appeal mechanism, in its current form, is technically challenging to implement and requires further deliberation. Airtel’s position remains that the proposal should be revisited with a focus on establishing a clear technological framework, defined processes, and industry-wide alignment prior to its introduction.</p> <p>Therefore, suggesting the modifications supporting the DLT’s feasibility.</p>
16.	24	(2) (3) (4)	No amendments are required in this clause; accordingly, TRAI may maintain the status quo.	Clauses with respect to appeals needs to be removed. For appeal related submission, please refer to Airtel’s comments for Regulation 23 (1)(c). The same is not being repeated herein for the sake of brevity.
17.	25		No Changes Required.	Airtel notes that under the existing complaint resolution framework prescribed in the Regulations, action against a sender is triggered upon receipt of five unique complaints. In order to better align technology-driven detection with consumer-led validation, the Authority has proposed a calibrated refinement whereby this threshold may be reduced to three complaints in cases where the CLI has

				<p>already been flagged as suspected spam by TSPs' AI/ML-based systems. This approach appropriately recognizes that AI/ML flagging provides an additional layer of credible, data-driven evidence, thereby warranting faster intervention in such cases.</p> <p>Airtel is aligned with this proposal, as it strikes a balanced approach between proactive detection and due process. By combining AI/ML-based identification with a reduced complaint threshold, the framework enables quicker and more targeted action against potential spammers while continuing to safeguard against false positives through consumer corroboration.</p>
18.	25	(4)(ii)	<p>Provided also that in case of complaint originating due to registration of content template in wrong category, the content template shall be blacklisted by the OAP; and if five content templates of such sender are blacklisted for registration under wrong category, the OAP shall suspend the services of the sender, for one month or till such time all the content templates of the sender are reverified for registration under proper category, whichever is later;</p>	<p>Prior to providing substantive inputs, Airtel respectfully submits that the Authority may kindly clarify whether the prescribed threshold of five templates is to be assessed cumulatively across all TSPs or is to be applied at the level of an individual OAP. In either scenario, it is imperative that the process of closure and the corresponding remarks are standardized across TSPs to ensure consistency, transparency, and effective enforcement of action.</p> <p>Additionally, Airtel submits that the proviso warrants bifurcation into two distinct categories to address the underlying issues more precisely: (i) instances of misuse of templates by Telemarketers/Principal Entities through insertion of unsolicited or non-compliant content within the variable portion of approved templates; and (ii) cases of incorrect or non-compliant template registration attributable to Registrar TSPs.</p>
19.	25	(4)(f)(i)(B)	<p>Provided further that the Authority may, from time to time, classify senders into different</p>	<p>Classification of senders constitutes a critical element of the overall complaint handling framework. Accordingly,</p>

			<p>categories based on the parameters including, but not limited to,—</p> <p>(a) the importance of the entity to the economy or to a critical sector;</p> <p>(b) the criticality of services being delivered to consumers;</p> <p>(c) the nature and regulatory status of the entity;</p> <p>(d) the scale and volume of operations;</p> <p>(e) the extent and manner of usage of telecom resources; and</p> <p>(f) the potential impact of suspension/ disconnection of telecom resources on consumers; and may, accordingly, specify differentiated criteria for initiation of action and differentiated sets of enforcement measures applicable to such categories of Senders for violations of these regulations.</p>	<p>enterprises must be classified well in advance, based on the parameters prescribed by TRAI, to ensure that the complaint handling process remains seamless and is not impeded due to the absence of such prior classification.</p> <p>Accordingly, Airtel requests the Authority to incorporate and clearly specify the classification framework within the present amendment itself, so as to provide necessary regulatory clarity and enable seamless implementation of the complaint handling process.</p>
20.	25	(6) (b)	<p>Provided further that the Authority may, from time to time, classify senders into different categories based on the parameters including, but not limited to,—</p> <p>(a) the importance of the entity to the economy or to a critical sector;</p> <p>(b) the criticality of services being delivered to consumers;</p> <p>(c) the nature and regulatory status of the entity;</p> <p>(d) the scale and volume of operations;</p> <p>(e) the extent and manner of usage of telecom resources; and</p> <p>(f) the potential impact of suspension/ disconnection of telecom resources on consumers;</p> <p>and may, accordingly, specify differentiated criteria for initiation of action and differentiated</p>	<p>Classification of senders constitutes a critical element of the overall complaint handling framework. Accordingly, enterprises must be classified well in advance, based on the parameters prescribed by TRAI, to ensure that the complaint handling process remains seamless and is not impeded due to the absence of such prior classification.</p> <p>Accordingly, Airtel requests the Authority to incorporate and clearly specify the classification framework within the present amendment itself, so as to provide necessary regulatory clarity and enable seamless implementation of the complaint handling process.</p>

			sets of enforcement measures applicable to such categories of senders for violations of these regulations.	
21.	26	(2A)	No Changes Required.	For Regulation 26 (2A) Airtel is aligned with the proposed changes and does not seek any modifications.
22.	26	(4A)	For the purpose of audit of complaint handling process, the terminating and originating access providers shall provide the requested CDRs of the relevant period to the Authority. relevant information, records, or system-based validation outputs pertaining to the reported communication, as may be required by the Authority.	<p>It is submitted that, in current operational practice, TSPs do not maintain or access CDRs in a manner that enables direct retrieval and sharing for individual complaint validation purposes. Complaint verification is typically carried out through system-based queries and validation tools, which confirm whether the reported communication (call/SMS) has occurred, along with limited associated parameters required for resolution. As such, the requirement to provide full CDRs for audit purposes may not align with existing system architecture and operational processes.</p> <p>The blanket requirement to provide CDRs for audit purposes may impose operational challenges, including the need for system modifications, Further, providing full CDRs may not be necessary for achieving the objective of auditing complaint handling processes, where limited and relevant data points would suffice.</p> <p>Thus, it is submitted that audit requirements may be aligned with existing operational practices, i.e. Validation of complaints may be undertaken through system-based query outputs; and only relevant and limited information/metadata necessary for audit purposes may be shared with the Authority, instead of full CDRs.</p>
23.	27	(a)	without prejudice to any penalty which may be imposed under its License or under any Act for	i. The proposed imposition of shared liability between Registrar TSPs and OAPs raises significant concerns

			<p>the time being in force, OAP shall be liable to pay, by way of financial disincentive, an amount of one thousand rupees per count of valid complaint that is declared invalid:</p> <p>Provided that where UCC has originated due to Headers and Content Templates registered by another Access Provider in violation of the regulation thereon and OAP has taken action against such UCC as per regulation 25 of these regulations, the financial disincentive at the rate of one thousand rupees per count of valid complaint as above shall be imposed on the Access Provider that has registered such Headers.</p> <p>Provided further that where UCC has originated due to (i) wrong categorization of Content Templates registered by another access provider the OAP, or, (ii) Content Templates registered under wrong category by another access provider and the traffic has been sent by the OAP under the wrong category;</p> <p>the financial disincentive shall be imposed at the rate of one thousand rupees per count of valid complaint on the OAP as well as the access provider that has registered such Content Templates under wrong category.</p>	<p>from both a conceptual and operational standpoint. While Registrar TSPs are directly responsible for onboarding Principal Entities (PEs), registering headers, and validating templates, OAPs primarily function as transmission channels facilitating the delivery of communication.</p> <p>ii. Given this distinction, OAPs have limited visibility and control over the underlying intent, content, or subsequent misuse of headers and templates once registered. Imposing financial penalties on OAPs for actions that originate at the level of enterprise onboarding or header misclassification would therefore create a disproportionate and misaligned liability structure.</p> <p>iii. Further, such a framework risks diluting accountability at the true source of the issue, namely, weak due diligence during registration and misuse by enterprises or telemarketers, by spreading liability across entities that do not have equivalent control mechanisms. This may also lead to excessive compliance burdens on OAPs without a corresponding ability to prevent such violations.</p> <p>iv. In this context, the proposed shared liability framework may inadvertently penalize compliant operators while allowing structurally weak or arbitrage-driven entities to continue exploiting regulatory gaps.</p> <p>v. In view of the above, Airtel strongly recommends that financial disincentives be primarily anchored at the point of enterprise onboarding and header/template</p>
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				<p>registration, where the ability to prevent misuse is most effective. Registrar TSPs, being directly responsible for validation and compliance at this stage, are best placed to ensure adherence to regulatory requirements.</p> <p>Hence Airtel is proposing its modification to the proposed changes in accordance with the above.</p>
24.	29		No Changes Required	Airtel is aligned with the proposed changes and does not seek any modifications.
25.	34	34 (A)	No Changes Required	<p>Airtel is aligned with the proposed changes and does not seek any modifications.</p> <p>However, Airtel would like to submit its below submissions on Applicability of Regulatory Mandates on Third-Party Applications and OTT Communication Platforms.</p> <p>i. The TCCCPR framework has been instrumental in establishing strong controls within the licensed telecom ecosystem, including header registration, template scrubbing, and consent-based communication. However, its effectiveness is increasingly being diluted as malicious actors bypass these safeguards simply by shifting to unregulated platforms that offer similar communication functionalities without equivalent obligations. Fraud, by design, exploits the weakest link; unless safeguards extend across the entire communications</p>

				<p>ecosystem, outcomes will continue to fall short of the framework’s intent.</p> <ul style="list-style-type: none"> ii. A recent illustration of this gap is evident in TRAI’s direction to telcos as well as certain third-party call management applications that label calls as “spam”, instructing them not to misclassify calls originating from designated commercial series such as 140 and 1600. Despite this, such applications, which fall outside the direct regulatory ambit, have continued in practice to label these calls as spam. iii. As a result, the same category of calls is treated differently depending on the platform through which they are delivered. While telco networks comply with regulatory classification and safeguards, OTT and third-party applications apply their own filtering logic, leading to inconsistent treatment of identical communications. iv. This creates a clear asymmetry in obligations between regulated telecom operators and unregulated digital intermediaries, with material consequences for consumers, including exposure to fraudulent communications, loss of trust in legitimate enterprise communications, and reduced effectiveness of regulatory safeguards. v. To preserve the integrity of the regulatory framework, it is essential that regulation evolve in line with the communications ecosystem itself. The principle of functional equivalence must guide this evolution, ensuring that services performing similar roles in the communication chain are subject to
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				<p>comparable obligations, irrespective of the underlying technology or platform.</p> <p>vi. If this gap is not addressed, it will continue to enable regulatory arbitrage, weaken the impact of existing safeguards, and create an uneven compliance and competitive environment between licensed telecom operators and unregulated intermediaries.</p> <p>vii. Accordingly, Airtel requests the Authority to consider extending the applicability of relevant provisions of the TCCCP to third-party applications and OTT-based communication platforms, particularly those that enable, process, or materially influence commercial communications with end users.</p> <p>viii. At a minimum, such platforms should be subject to baseline obligations aligned with the telecom ecosystem, including adherence to consent frameworks, enforcement of anti-spam rules, and compliance with regulatory classifications of commercial communication. Ensuring parity across all communication channels is essential to maintaining the effectiveness, coherence, and credibility of the overall regulatory framework.</p> <p>Therefore, in view of the above Airtel submits that it is imperative to consider the formulation of a Robust Regulatory Framework that applies proportionate, risk-based, and enforceable safeguards across all platforms</p>
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				offering communication services in India, irrespective of the underlying technology.
26.	35		<p>Terminating Access Provider (TAP) may charge Originating Access Provider (OAP) for Commercial communication messages as following: -</p> <p>(1) Upto Rs. 0.05 (five paisa only) 0.10 (ten paisa only)/Rs. 0.11 (eleven paisa only) for each promotional SMS;</p> <p>(2) Upto Rs. 0.05 (five paisa only) 0.10 (ten paisa only)/Rs. 0.11 (eleven paisa only) for each service SMS;</p> <p>(3) Upto Rs. 0.05 (five paisa only) 0.10 (ten paisa only)/Rs. 0.11 (eleven paisa only) for each Transactional SMS;</p> <p>Provided that there shall be no Service SMS charge on: -</p> <p>(i) any message transmitted by or on behalf the directions of the Central Government or State Government;</p> <p>(ii) any message transmitted by or on behalf the directions of bodies established under the Constitution;</p> <p>(iii) any message transmitted by or on the directions of the Authority;</p> <p>(iv) any message transmitted by any agency authorized by the Authority from time to time;</p>	<p>i. Airtel submits that the current regulatory framework governing SMS termination does not adequately distinguish between Person-to-Person (P2P) and Application-to-Person (A2P) traffic, despite their fundamentally different characteristics, use cases, and impact on consumers.</p> <p>ii. P2P SMS is largely conversational, low-volume, and user-driven, A2P SMS is enterprise-driven, high-volume, and commercial in nature. Airtel has consistently advocated that these two categories should be commercially and regulatory segregated, with the scope of mandatory interconnection restricted strictly to P2P voice and SMS.</p> <p>iii. In the absence of such segregation, A2P traffic continues to leverage the same interconnection framework as P2P, resulting in misaligned pricing, regulatory arbitrage, and suboptimal consumer outcomes.</p> <p>iv. Under the current regime, the SMS termination charge is ₹0.07 per SMS (₹0.02 base charge + ₹0.05 additional charge under TCCCP). The ₹0.05 additional component was not designed as a deterrent, but rather as a commercial construct to support regulatory processes. Consequently, the overall pricing remains insufficient to discourage excessive or unsolicited A2P messaging.</p>

				<p>v. Further, it is important to highlight that this ₹0.05 add-on charge was prescribed at a time when the DLT framework had not yet been deployed. Since then, operators across the industry have undertaken significant capital and operational expenditure to establish, integrate, and maintain advanced DLT systems. These platforms enable sender registration, consent management, header and content template verification, scrubbing, and real-time traceability, forming the backbone of India’s anti-spam architecture. Despite this robust regulatory and technological ecosystem, spam and unsolicited messaging remain persistent, primarily because current pricing does not impose any real deterrence on bulk spammers or non-compliant entities.</p> <p>vi. There is, therefore, a compelling need to increase the existing Rs. 0.05 to at least ₹0.10-0.11 for commercial SMS – in addition to the existing termination charges of ₹0.02. Such a charge would:</p> <ul style="list-style-type: none"> • Encourage enterprises to adopt more selective, targeted, and responsible messaging practices. • Strengthen the effectiveness of the regulatory safeguards already implemented to protect customers from spam. <p>vii. Even with the current total charge of ₹0.07 for Service and Promotional SMS (comprising termination charge of ₹0.02 + additional charge under the TCCPR of ₹0.05), India’s commercial SMS termination charges continue to remain significantly lower compared to prevailing rates in several developing and developed economies – as evident from the below table:</p>
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				<table border="1"> <thead> <tr> <th>S. No.</th> <th>Country</th> <th>Domestic SMS Termination Charge (in ₹/SMS)</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Argentina</td> <td>8.4</td> </tr> <tr> <td>2.</td> <td>Brazil</td> <td>5.4</td> </tr> <tr> <td>3.</td> <td>UK</td> <td>4.2</td> </tr> <tr> <td>4.</td> <td>Turkey</td> <td>2.7</td> </tr> <tr> <td>5.</td> <td>US</td> <td>0.7</td> </tr> <tr> <td>6.</td> <td>Canada</td> <td>0.7</td> </tr> <tr> <td>7.</td> <td>South Africa</td> <td>0.27</td> </tr> <tr> <td>8.</td> <td>India</td> <td>0.07</td> </tr> </tbody> </table> <p>viii. In the absence of immediate structural reforms such as full traffic segregation or direct interconnection mandates for A2P communication, revision of SMS termination charges is a practical, targeted, and high-impact intervention.</p> <p>ix. By introducing a stronger economic deterrent, TRAI can effectively curb unsolicited messaging, improve customer experience, and ensure that the regulatory framework remains aligned with evolving market realities.</p> <p>In view of the above, Airtel submits that a dedicated deterrent charge, of at least ₹0.04-0.05, should be introduced for domestic commercial SMS, in addition to the existing termination charge of ₹0.02 and additional charge under the TCCCP of ₹0.05, to deter bulk spamming, encourage responsible enterprise communication practices and ensure a fair, secure and economically viable digital messaging ecosystem.</p>	S. No.	Country	Domestic SMS Termination Charge (in ₹/SMS)	1.	Argentina	8.4	2.	Brazil	5.4	3.	UK	4.2	4.	Turkey	2.7	5.	US	0.7	6.	Canada	0.7	7.	South Africa	0.27	8.	India	0.07
S. No.	Country	Domestic SMS Termination Charge (in ₹/SMS)																													
1.	Argentina	8.4																													
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8.	India	0.07																													

27.	35	35A	<p>(1) The Terminating Access Provider (TAP) may charge the Originating Access Provider (OAP) upto Rs. 0.05 (five paisa only) 0.50 (fifty paisa only) per minute for commercial calls including A2P calls;</p> <p>(2) The Terminating Access Provider (TAP) may charge the Originating Access Provider (OAP) up to Rs. 0.05 (five paisa only) for each call attempt in case of commercial calls including A2P and P2P calls;</p> <p>Provided that there shall be no termination charge or attempt based charging on: - (i) any A2P calls made by or on behalf of the Central Government or State Government; (ii) any A2P calls made by or on behalf of bodies established under the Constitution; (iii) any A2P calls made by or on the directions of the Authority; (iv) any A2P calls made by any agency authorized by the Authority from time to time; (v) any A2P calls made by using number resources assigned from 140xx, 1600xx or any other series designated by the Authority for commercial communications from time to time.</p>	<p>A. Introduction of Deterrent Charges on Commercial Calls including A2P and P2P Voice Calls</p> <p>i. Airtel submits that Commercial voice communication has increasingly become the preferred channel for dissemination of unsolicited commercial communication due to the absence of any pricing deterrence.</p> <p>ii. Unlike SMS, which is governed by a defined commercial construct under TCCCP, Commercial voice calls are not subject to any termination charges or economic disincentives.</p> <p>iii. This regulatory asymmetry has led to a shift in spam traffic from SMS to voice channels, thereby undermining the effectiveness of existing safeguards.</p> <p>iv. The absence of a deterrent framework for Commercial voice calls has enabled:</p> <ul style="list-style-type: none"> • Mass-scale robocalling • Automated dialing campaigns • Increased instances of fraud and impersonation <p>v. Airtel submits that introduction of a deterrent pricing framework for Commercial voice calls is both necessary and urgent to:</p> <ul style="list-style-type: none"> • Restore regulatory parity between SMS and voice communication channels. • Introduce economic disincentives that discourage indiscriminate bulk calling practices. • Reduce the overall incidence of UCC and protect consumer interests.
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				<ul style="list-style-type: none"> • Ensure that the cost of network usage and regulatory compliance is equitably borne by originating entities. • Prevent continued migration of spam traffic across channels due to regulatory arbitrage. <p>vi. Such a measure would also align with the broader objectives of the TCCCP framework, including consumer protection, transparency, and accountability in commercial communications.</p> <p>vii. Therefore, there is an urgent need for the Authority to introduce a termination charge on Commercial voice calls, payable by the Originating Access Provider (OAP) to the Terminating Access Provider (TAP).</p> <p>viii. Considering that, unlike SMS, the cost of operating of voice over networks is significantly higher, owing to factors such as higher network resources, dedicated infrastructure investments, and real time interaction, Airtel submits that an indicative benchmark of ₹0.50 per minute may be considered to establish an effective deterrent, while still allowing legitimate business communications to continue in a regulated manner.</p> <p>ix. Airtel further submits that any exemption from the proposed deterrent charging framework for specific numbering series such as 1600xxx and 140xxx would severely dilute the intended impact of this measure. While the 1600xxx series is designated for transactional communications, it is precisely for this</p>
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				<p>reason that it is critical to safeguard such series from any potential misuse.</p> <p>x. Any exclusion from deterrent charging would create a regulatory blind spot, increasing the risk of such series being exploited for unauthorized or spam communications under the guise of legitimate transactional traffic. This would not only undermine consumer trust but also defeat the very purpose of assigning dedicated numbering resources for specific communication categories.</p> <p>xi. Airtel strongly emphasizes that deterrent charging must be applied in a technology-neutral and number-series agnostic manner, irrespective of whether calls originate from 1600xxx, 140xxx, or any other numbering resource. Any differential treatment would be inconsistent with the principle of regulatory parity and would undermine the objective of curbing UCC in a holistic manner.</p> <p>xii. Further, granting exemptions to select categories of entities or numbering series would not only distort the level playing field but also weaken enforcement by creating identifiable “safe harbors” for spammers. Accordingly, Airtel submits that no exemptions should be provided, and the deterrent charging framework must be uniformly applicable across all commercial voice traffic to ensure effectiveness, fairness, and regulatory certainty.</p> <p>In view of the above, Airtel submits that introduction of deterrent charges of ₹ 0.50 on commercial voice calls is</p>
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				<p>both necessary and urgent to address the growing misuse of voice channels for UCC.</p> <p>B. Introduction of Attempt-Based Charging for Commercial Voice Calls</p> <p>i. As specified above, the rapid proliferation of unsolicited commercial communication (UCC), particularly through voice calls, has emerged as a significant concern. The misuse of telecom resources by certain enterprises, telemarketers, and unregistered entities has led to a sharp increase in intrusive voice spam, robocalling, and fraud.</p> <p>ii. Based on the insights derived from our Spam Solution, which was launched in September 2024, we have observed several key trends and patterns. The data presented below has been generated directly from this solution and reflects its analysis of spam activity over the period since its implementation:</p> <ul style="list-style-type: none">a. Calls were received from 40.7 lakh numbers; out of these, 3.2 lakh were tagged as suspected spam while 37.5 lakh were non-spam.b. Spam numbers made 1400 calls/day/number on average, as against 40 calls/day/number for genuine callers, indicating industrial-scale auto-dialing behavior.
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				<ul style="list-style-type: none"> c. Genuine calls lasted 57 seconds on average, whereas spam calls were significantly shorter at 35 seconds. d. A large proportion of spam calls are short and non-meaningful, 43% are under 10 seconds and only 12% exceed 60 seconds, compared to 25% and 20% respectively for genuine calls. <p>iii. The above analysis indicates that per-minute charging would not act as an effective deterrent, and a call attempt-based charging mechanism is necessary to meaningfully curb such spam calls.</p> <p>iv. Despite multiple regulatory interventions under the TCCCP framework, including DLT platforms and consent registration mechanisms, the persistence and scale of voice-based spam indicate the existence of structural gaps in the current regime particularly in the way voice traffic is priced and accounted for.</p> <p>v. At present, the charging framework for voice calls is predominantly termination-based, wherein costs are incurred only when a call is successfully connected and sustained between the originating and terminating networks.</p> <p>vi. While this model is appropriate for legitimate person-to-person (P2P) communication, it creates unintended consequences in the context of commercial voice traffic including A2P traffic. The Key concerns include:</p>
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				<ul style="list-style-type: none"> • Absence of Cost at Call Initiation Stage There is no financial implication for initiating a call attempt, regardless of whether the call is answered, rejected, or remains a missed call. • Enabling Mass-Scale Auto-Dialing Spammers and fraudulent actors can deploy automated dialing systems to generate millions of call attempts at negligible cost, with minimal downside risk. • Distortion of Traffic Patterns The current framework incentivizes high-volume, low-quality call attempts rather than targeted, consent-based communication. • Consumer Impact Without Corresponding Accountability Customers are subjected to: <ul style="list-style-type: none"> ○ Frequent missed calls and short-duration rings ○ Repeated and intrusive disturbances throughout the day ○ Increased exposure to fraud and scam attempts • Regulatory Gap
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				<p>The economic burden is triggered only upon successful call completion, whereas the actual consumer harm begins at the point of call attempt.</p> <p>vii. Therefore, in this context, Airtel submits that there is a clear need to rebalance the charging framework to better reflect the point at which consumer harm and nuisance originate.</p> <p>viii. The absence of any economic deterrent at the call attempt stage:</p> <ul style="list-style-type: none"> • Encourages indiscriminate dialing practices • Undermines the effectiveness of existing regulatory tools such as DLT and consent frameworks • Allows fraudulent actors to scale operations without proportionate financial exposure • Results in a negative externality, where consumers bear the inconvenience and risk, while originators incur minimal cost <p>ix. A targeted regulatory intervention is therefore required to introduce accountability at the point of origination.</p> <p>x. Airtel proposes a calibrated shift towards an attempt-based charging framework for A2P commercial voice calls, wherein a nominal charge is levied on each call attempt initiated by the originating network, irrespective of call completion.</p>
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				<p>xi. This approach should be designed in a measured and proportionate manner to avoid disruption to legitimate communications while effectively curbing misuse.</p> <p>xii. The introduction of attempt-based charging is expected to deliver multiple regulatory and consumer benefits:</p> <ul style="list-style-type: none"> • Creation of Economic Disincentives <ul style="list-style-type: none"> ○ Increases the cost of high-volume, non-targeted call attempts ○ Discourages spam campaigns and robocalling practices • Promotion of Responsible Communication Practices <ul style="list-style-type: none"> ○ Encourages enterprises to adopt consent-based and targeted outreach ○ Drives migration toward compliant channels such as registered headers/templates • Strengthening of Existing Regulatory Framework <ul style="list-style-type: none"> ○ Complements DLT, scrubbing mechanisms, and Consent Registration Function (CRF) ○ Enhances overall effectiveness of UCC control measures
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				<ul style="list-style-type: none"> • Reduction in Consumer Nuisance and Fraud Risk <ul style="list-style-type: none"> ○ Directly addresses missed calls, repeated disturbances, and scam attempts ○ Improves consumer trust in telecom networks • Alignment of Cost with Impact <ul style="list-style-type: none"> ○ Ensures that entities generating network load and consumer harm bear a proportionate economic cost. <p>xiii. Attempt-based charging represents a fundamental shift from network-centric cost recovery to consumer-centric harm mitigation.</p> <p>xiv. By introducing accountability at the point of call initiation, the proposed framework directly targets the root cause of nuisance and fraud in voice communications. It addresses the existing regulatory gap, reduces arbitrage opportunities, and ensures that economic incentives are aligned with responsible behavior.</p> <p>xv. This measure, implemented in coordination with existing regulatory tools and supported by all stakeholders, has the potential to significantly curb UCC, restore consumer trust, and create a safer and more accountable telecom ecosystem.</p>
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				<p>Considering the above, Airtel submits that the TRAI should introduce charges of ₹ 0.05 on call initiation to address the growing misuse of voice channels for UCC.</p>
28.	Schedule 1	4(3)(m)	To be Removed.	<p>All Access Providers, being licensed operators under the Unified License (UL), are equally bound by and responsible for compliance with the roles and obligations prescribed under the Regulations. In this context, it is incumbent upon the Access Provider, in its capacity as the Registrar TSP, to undertake adequate due diligence prior to the registration of any content template. The DLT framework, built on blockchain principles, has been introduced to enhance efficiency, transparency, and timeliness in the transmission of commercial communications across SMS and voice channels. Accordingly, the introduction of additional manual interventions, necessitated solely due to a lack of due diligence on the part of any Access Provider, would be counterproductive to the very objectives of the framework and should not be envisaged.</p> <p>Further, TRAI has already clarified under the 2025 amendments that the liability for incorrect or non-compliant template registration squarely rests with the Registrar TSP. In view of the same, the existing regulatory position should be maintained, and no additional, impractical, or time-intensive obligations should be imposed on Access Providers, particularly given the operational sensitivities and criticality of the regulatory framework.</p>
29.	Schedule 2		No Changes Required	Airtel is aligned with the proposed changes and does not seek any modifications.
30.	Schedule 4	4	(4) Access providers shall intimate through SMS or mail, the senders detected above that they have been identified as suspected UCC senders and that they must refrain from sending UCC.	Airtel requests the Authority to kindly consider the submissions made through COAI on the proposed AI/ML framework. In light of the same, it is submitted that the proposed changes may require suitable refinements to

			Provided that the authority may prescribe the format of such notice from time to time.	ensure alignment with the industry's operational realities and the intended regulatory objectives.
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