

1. Regulation-wise Comments (TRAI Prescribed Format)

Sl. No.	Regulation No.	Sub-regulation / Item	Modification Proposed	Reasons / Justification
1	Regulation 2	Clause (ea)(new insertion)	We respectfully request the following proviso be added after the proposed definition of A2P calls: “Provided that a voice call shall not be classified as an A2P call if a live human agent is directly and actively participating as a party in the call, even if the call is initiated through an API, automated platform, or CPaaS system. Such calls shall be referred to as ‘Human-Assisted API Calls’.”	The proposed definition may inadvertently include human-assisted API calls (click-to-call or agent-assisted calls) where a live human is connected to the customer. Examples include ride-hailing drivers–customer connections, food delivery coordination, and healthcare teleconsultation — where the API merely facilitates the connection and a live person is actively speaking. Applying A2P termination charges and pre-declaration requirements to such calls would impose a compliance burden on legitimate transactional services without a commensurate UCC prevention benefit. We humbly request that this definitional distinction be clarified before the charge regime is operationalised.
2	Regulation 4 (substituted)& New Regulation 35A	All sub-regulations	(a) We request that Human-Assisted API Calls (as defined under Regulation 2(ea)) be explicitly excluded from A2P termination charges. (b) We request clarification that, for VNO-mediated calls, the pre-declaration obligation flows from the enterprise client to the VNO, and from the VNO to the NSO — not directly from the enterprise client to the OAP/TAP.	(a) Human-in-loop API calls do not exhibit the characteristics (automated, prerecorded, no live human) that the A2P deterrent is designed to address. Applying the same charge to a doctor calling a patient via a CPaaS platform as to a robo-call may be disproportionate. (b) VNOs are licensed intermediaries between enterprise clients and NSOs/TSPs. Enterprise clients registered on a VNO’s platform have no direct relationship with the OAP/TAP. The pre-declaration mechanism as proposed may not be practically implementable for VNO-served entities without accounting for this intermediary layer.
3	Regulation 25	Sub-regulation(5)(d)(i)	We respectfully request that: <ul style="list-style-type: none"> The reduced threshold of 3 complaints in 10 days should not apply where the CLI belongs to a sender registered through a licensed VNO and the call is verifiably transactional or service in nature. OAP/TAP should verify the DLT registration status of a CLI before applying the reduced threshold. VNOs should receive real-time AI-flagging notifications 	Our experience shows approximately 80–85% of complaints against our enterprise clients relate to validated transactional calls — ride-hailing, food delivery, e-commerce — where customers file complaints due to service dissatisfaction rather than genuine UCC. These complaints are consistently disposed as invalid upon verification. Reducing the threshold to 3 complaints without differentiating registered transactional senders may trigger suspension before verification is complete, affecting services to a large number of end consumers. High-volume click-to-call platforms also exhibit volumetric patterns similar to UTMs (high call volume, B-number diversity, low incoming ratio), making them susceptible to false AI flagging. VNOs currently have no real-time visibility into AI-flagging events, which limits their ability to act proactively.
4	Regulation 25	Sub-regulations(3),	We support the proposed timeline extensions We	The timeline extensions are a welcome step. However, the 5-business-day notice period

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		(4), (5)— timeline revisions	additionally request: (a) the 5-business-day reply window be a mandatory minimum for VNO's and should exclude time taken by OAPs / TAPs (b) Should exclude pre-verified use cases / Enterprises / headers already verified by VNOs	would benefit enterprise clients most effectively if the VNO is simultaneously notified. As the entity managing the client's telecom resources, the VNO is best positioned to investigate call records and assist in preparing a timely response. Without VNO notification, enterprise clients may be unaware of the notice or unsure how to respond. Further as mentioned 80-85% of the complaints are not-guine. This will ease the pressure on law-abiding enterprises instead of increasing the risk on their business.
5	Regulations 8 and 22	New sub-regulation (to be inserted)	We respectfully request insertion of a provision requiring: <ul style="list-style-type: none"> • NSOs provide affiliated VNOs with real-time API-based access to UCC complaints, AI-flagging alerts (Suspected UCC CLI), and CDR data for CLIs assigned to the VNO's enterprise clients. • A saving clause that VNOs shall not be penalised for non-compliance with complaint-handling timelines they cannot independently observe, until such access infrastructure is operationalised. 	VNOs are responsible for TCCCPR compliance but currently have no direct access to DLT complaint data, AI-flagging notifications, or CDRs. The draft amendment introduces significant new obligations — AI-triggered actions, reduced thresholds, CDR sharing — without addressing this access gap. We humbly submit that compliance obligations and access to the tools required to fulfil them must be aligned. Until NSOs provide VNOs with functional, real-time API-based access, VNOs cannot practically meet the new obligations proposed in this amendment.
6	Regulation 2	Clause (y)— substitute (Explicit Consent)	We support the revised definition of Explicit Consent that recognises lawfully obtained legacy consents. We additionally request that VNOs be authorised to register legacy consents on behalf of their Principal Entity clients through the NSO-operated Consent Register Framework portal, using the VNO's Licensee ID.	Many enterprise clients hold large offline consent databases predating the CRF. While the revised definition provides a welcome migration pathway, these clients often lack the technical capability to upload consents directly on NSO DLT systems. VNOs are well-positioned to assist in this migration, and formal authorisation for VNOs to do so on behalf of their clients would help ensure orderly and timely implementation.
7	Regulation 3 & Schedule I	Enabling provisions for sender classification & number series	We respectfully request the Authority to consider issuing a time-bound roadmap (within 90 days of the amendment coming into force) for expanding the 1600-series to all sectors (Non-BFSI) making legitimate transactional and service calls,	The current framework creates an unintended disparity: BFSI entities enjoy the protection of the 1600-series for transactional calls, while equally legitimate callers in other sectors do not. This leaves non-BFSI enterprise callers exposed to AI flagging, app-based suppression, and A2P termination charges from which BFSI callers are exempt — despite identical use cases.

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			<p>including healthcare, logistics, and e-commerce. Until the 1600-series is expanded, we request that AI-flagging and complaint-threshold mechanisms provide equivalent protection to registered senders on non-1600 numbers making verified transactional calls.</p>	<p>We humbly submit that this disparity may undermine the Authority’s objective of enabling lawful commercial communications across sectors.</p>