



Fintech Association for Consumer Empowerment (FACE)
An RBI-recognised Self-regulatory Organisation in the FinTech Sector (SRO-FT)

To
Shri Deepak Sharma
Advisor (QoS-II)
Telecom Regulatory Authority of India (TRA)
New Delhi, India

19 Apr 2026

Sub: Consultations on draft Telecom Commercial Communications Customer Preference (Third Amendments) Regulations 2026

Fintech Association for Consumer Empowerment (FACE) is an industry body and an RBI-recognised Self-regulatory Organisation in the FinTech Sector (SRO-FT). Our 380+ members operate across the financial sector, providing and enabling digital financial services, including payments, credit, insurance, and wealth.

We truly appreciate TRAI's continued efforts to improve the integrity, trust, and value of commercial communication, meeting the needs of consumers and companies alike in a fast-evolving environment. It is in the same spirit that we submit our feedback for your kind consideration.

Thank you.

Regards,

A handwritten signature in black ink, appearing to read 'Sugandh', with a horizontal line underneath.

(Sugandh Saxena)
CEO, FACE

SI no	Regulation Number	Sub regulation /Item Number	Modification proposed to the draft amendment	Reasons/ full justification for the proposed modifications
1.	2	bb	1. We request that “inquiry” be reinstated within the definition of “Relationship”.	1. The removal of “inquiry” from the definition of “Relationship” and the revised definition of “Service Calls and Messages” (which now includes calls made during the customer journey), explicit consent is effectively required even for service-related communications, including calls to assist customers in completing their journey (Drop-off Calling). This change implies that even non-promotional service calls would require consent registration with the consent registrar, increasing cost and compliance for legitimate use cases and diluting the concept of inferred consent. There are several cases where customers make an inquiry for a financial product before filling out the application form on the digital platform. Since the customer has come to a digital platform and inquired, this indicates a clear intent to obtain further details. Hence, calls to such customers are not ‘promotional’.

Sl no	Regulation Number	Sub regulation /Item Number	Modification proposed to the draft amendment	Reasons/ full justification for the proposed modifications
2.	2	bh	<ol style="list-style-type: none"> 1. The timeline for making service calls to facilitate or complete a commercial transaction is 7 days. We request that this 7-day timeline be extended to 30 days. 2. To enhance the flexibility of service-related communications, we recommend carving out a dedicated 12-month timeline beyond the service end date for use cases that require post-engagement interaction. 	<ol style="list-style-type: none"> 1. We argue for a longer time as financial products, such as loans, investments and insurance, require longer engagement with customers to understand the product features, benefits/risks and make comparisons. Hence, customers take longer to make decisions. 2. For financial services, sustained engagement and relationships are critical to the business model. For example, soliciting feedback or offering enhanced services and repeat credit facilities. Extending this timeline ensures that legitimate service continuity and customer re-engagement are not prematurely stifled by rigid expiration windows.
3.	2	y		<p>We would request TRAI to consider aligning procedural guidelines on separate and specific requirements for uploading regularly on the Consent Registrar with other adjacent and related laws (eg: DPDPA, IT and Evidence Act and sectoral regulations). These require entities to maintain verified, audit-able consent from their customers in their own records and systems and hence need to minimise administrative and compliance burden by removing multiplicity and encouraging interoperability.</p>

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4.	25	4f	<p>1. We request that the limit of complaints, including if UCC calls are flagged by the AI systems of the Access Providers, should not be lowered below 5. Further, “complaints” should be qualified with “complaints decided in the consumer’s favour.”</p>	<p>1. Considering that AI systems are still evolving, and that complaints themselves may be frivolous or inadvertent and ultimately decided in the sender’s favour, such triggers risk penalising legitimate communications.</p>
5.	25	4d(ii)	<p>1. It is recommended that the liability for incorrect template categorisation not rest solely with the Sender, given the existing approval role of the OAP. In cases where discrepancies are identified, including post-registration, the Sender should be given an opportunity to rectify them within a prescribed timeline.</p>	<p>1. Content templates are not registered without prior approval from the OAP, which reviews submissions and flags discrepancies before registration. This well-established checker mechanism serves as a control to prevent incorrect categorisation and ensures shared responsibility between Sander and OAP. Accordingly, placing sole liability on the Sender overlooks OAP’s role in the approval process.</p> <p>2. Further, allowing a correction window for genuine errors ensures that legitimate communication is not unduly disrupted. In the event the Sender fails to do so, a suspension may be imposed until the discrepancy is corrected.</p>

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6.	35	-	<p>1. Carve out for Regulated Entities (REs) of Financial Sector Regulators and Senders working for REs under this framework or a market-based approach to specifically deter the bad actors.</p>	<ol style="list-style-type: none"> 1. The assumption of increasing the cost of A2P to address the issue will have implications beyond. Such a pricing mechanism will significantly increase the cost of commercial communication by legitimate Senders like NBFCs/FinTechs. 2. One approach to address this could be a carve-out for Senders who are REs of Financial Sector Regulators working with such REs. 3. Alternatively, rather than a universal approach, this can be left to the market arrangements between the TAP, OAP, and the Sender to apply this sharply against misuse rather than generally to everyone.