

To,

Date: 19/04/2026

Shri Deepak Sharma,
Advisor (QoS-II),
Telecom Regulatory Authority of India (TRAI),
New Delhi – 110029.

Subject: Counter-Comments on Consultation Paper No. RG-25/(25)/2023-QoS regarding Draft TCCCPR (Third Amendment) Regulations, 2026.

Dear Sir,

Go 2 Market India Pvt Ltd, as a licensed Virtual Network Operator (VNO) and CPaaS provider, urges TRAI to adopt a **Proportional and Identity-Centric model**. While we support the Authority's goal of curbing UCC, we believe the current draft relies on "fixed thresholds" that inadvertently penalize high-volume legitimate businesses while failing to stop unethical entities who rotate both mobile SIMs and corporate fixed-line identities through the ease of starting new shell companies.

Our Statement of Case emphasizes the following strategic pillars:

- **VNOs as "Regulatory Aggregators":** VNOs should be formally positioned as **Regulatory Aggregators** who act as the regulator's eyes at the edge. The BPO and CPaaS industry is a massive job creator. By giving VNOs a "Safe Harbor" from blanket AI disconnections, you protect the legitimate transactional traffic that powers the digital economy. Furthermore, incentivizing aggregators to take VNO licenses increases the government's **AGR pool**, turning the 'spam menace' into a regulated, tax-paying revenue stream.
- **Identity-Centric Licensing:** We propose that TRAI move from regulating numbers to regulating **verified licenses**. By giving VNOs "**Tenant Status**" on the DLT and sharing the A2P revenue, you create a self-policing ecosystem. VNOs will naturally filter out unethical spammers because their own license and security deposit are at stake.
- **Proportionality and Statistical Integrity:** Thresholds for AI-flagging must be **indexed to the number of channels and resources** an entity manages. For a CPaaS provider managing thousands of channels, a fixed threshold of 3 complaints is a statistical inevitability. Indexing ensures high-volume providers are not wrongly disconnected due to invalid consumer reports.
- **Economic Deterrence for UTMs:** We propose "Safe Harbors" for licensed VNOs and severe economic deterrents for unregistered entities, such as aggressive **Fair Usage Policies (FUP)** for non-DLT connections, making SIM-based and shell-based spamming economically unviable.
- **Elimination of Redundant A2P Charges:** VNOs operate under one-to-one commercial agreements with TSPs. Imposing a mandatory 5-paisa charge on VNOs who already pay AGR and network fees creates an unviable "**double-tax**" on legitimate traffic.

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Point wise response of Go 2 Market India Pvt Ltd:

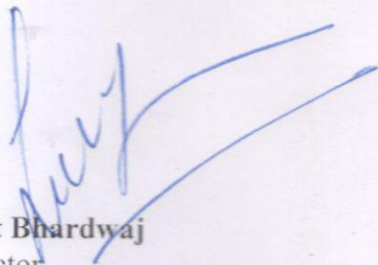
S.No	Regulation Number	Sub-regulation / Item	Modification Proposed to the Draft Amendment	Reasons / Full Justification for Proposed Modifications
1	Regulation 35A	Proviso (v)	Eliminate/Exempt A2P Charges for VNOs: Exempt all calls originated via licensed VNOs from the 5-paisa charge.	Problem: VNOs have bilateral one-to-one commercial agreements with TSPs. Solution: Cost recovery is already governed by commercial contracts. A regulatory charge creates a "double-tax" on AGR-paying entities.
2	Regulation 2	New clause after (ea)	Define "Human-Assisted API Calls": Exclude calls where a live agent is actively participating from A2P charges.	Problem: Automated A2P rules inadvertently tax vital services like telehealth bridging. Solution: Focuses deterrents on automated robo-calls while protecting the BPO job economy.
3	Regulation 3	First Proviso to Sub-reg (1)	Formalize 4-Tier DLT Hierarchy: Formally recognize the chain: NSO → VNO → Telemarketer → PE.	Problem: VNOs are legally liable but remain "invisible" in the current DLT system. Solution: Formal recognition allows VNOs to proactively block shell companies from obtaining resources.
4	Regulation 4 &	New Provision	Mandatory Persistent Identity Blacklisting: Shift penalties from the CLI to the Persistent PE ID.	Problem: spammers rotate fixed-line identities via shell companies to bypass blocks. Solution: Global DLT blacklisting follows the Entity ID, preventing "identity-hopping" across all providers.
5	Regulation 25	Sub-reg (5)(d)(i)	Normalized Complaint Threshold: Index the 3-complaint threshold to the total number of channels/resources.	Problem: High-volume CPaaS trunks hit fixed low thresholds through statistical "false positives". Solution: Normalization ensures scale does not lead to wrongful service barring.
6	Regulation 8 & 22	New Sub-reg	Mandatory API-Based DLT Visibility: NSOs must provide VNOs real-time API access to complaints within two hours.	Problem: VNOs are held responsible but are "blind" to complaints until a suspension occurs. Solution: Visibility allows VNOs to stop bad actors before network triggers occur.
7	Regulation 11	Sub-reg (4) [Usage Caps]	Economic Deterrent (FUP): Introduce a Fair Usage Policy for all non-DLT connections (SIM/Fixed-line).	Problem: Spammers exploit cheap, anonymous P2P routes. Solution: Volume-based pricing drives bulk callers into the traceable, license-verified VNO ecosystem.
8	Regulation 21A & 25	Sub-reg (5)(d)(i)	Verified "Safe Harbor" Window: Mandate a 24-hour verification window for DLT-registered CLIs flagged by AI.	Problem: AI cannot distinguish between a busy BPO agent and a robo-caller. Solution: Humans audit the AI "False Positives" to shield critical transactional alerts.
9	Regulation 34A	Sub-reg (1)	Universal DLT Protection: Prohibit app-tagging for all DLT-registered CLIs, regardless of the series.	Problem: Only BFSI (1600 series) is protected. Solution: Parity ensures Logistics and Healthcare calls are not wrongfully tagged as "Spam" by OTT apps.
10	Schedule I	Item 1(4)	Alternative Digital KYC: Allow GST-verified digital KYC for cloud-based and remote entities.	Problem: Physical verification is a bottleneck for cloud/WFH enterprise models. Solution: Aligns with national digital policy for secure, rapid onboarding.

Conclusion

Go 2 Market India Pvt Ltd believes that the VNO framework is a regulatory asset. By adopting an Identity-Centric model, indexing thresholds to operational scale, and removing redundant charges for licensed entities, TRAI can achieve a secure network without compromising the service continuity of India's vital transactional voice economy.

Respectfully Submitted,

For Go 2 Market India Pvt Ltd



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