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Mon, 13 Apr 2026 11:31:24 AM +0530

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===== Forwarded message =====

From: Rahul Rajendraprasad <rahul.rajendraprasad@hdfc.bank.in>

To: "Deepak Sharma" <advqos@trai.gov.in>

Cc: "SANJOY BHATTACHARJEE" <sanjoy.bhattacharjee@hdfc.bank.in>, "Nishant Jogi" <nishant.jogi@hdfc.bank.in>, "Alok Sharan" <alok.sharan@hdfc.bank.in>, "Mitesh Gandhi" <mitesh.gandhi@hdfc.bank.in>

Date: Mon, 13 Apr 2026 11:17:33 +0530

Subject: HDFC Bank Feedback - Draft Consultation Paper TCCCP (Third Amendment), 2026

===== Forwarded message =====

Classification - Internal

Dear Sir,

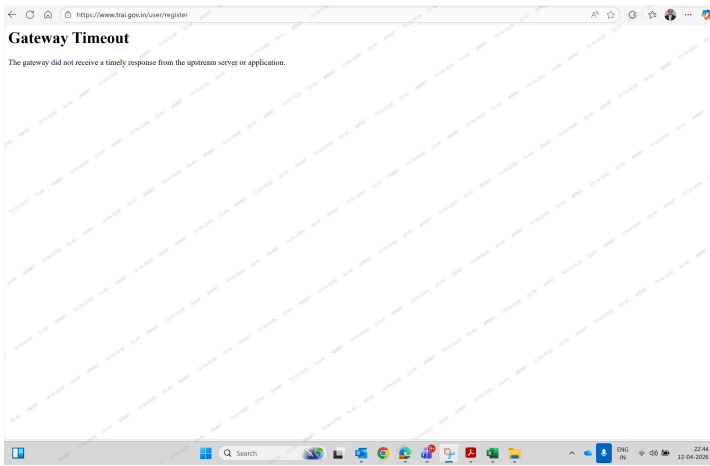
We thank the Telecom Regulatory Authority of India (TRAI) for the opportunity to provide comments on the Draft Telecom Commercial Communications Customer Preference (Third Amendment) Regulations, 2026. We appreciate the Authority's continued efforts to strengthen the regulatory framework for curbing Unsolicited Commercial Communications (UCC).

As a large banking institution, we submit our comments below along with specific references to the relevant regulations/sub-regulations and our recommendations in the prescribed format.

Sl. No	Regulation number	Sub regulation/ item number	Modification proposed to the draft amendment	Reasons/ full justification for the proposed modifications
1	New provisions (AI framework)	21A (AI/ML detection mechanism)	<ul style="list-style-type: none"> AI/ML-based UCC_Detect system established by the access providers in accordance with Schedule IV needs to be tested thoroughly with Banking industry & Sender participants for a period of 6 months with feedback implemented for any requisite guardrails needed prior to full scale deployment of AI / ML AI/ML-based UCC_Detect system should be leveraged by Telcos for customer complaint screening regarding usage of 1600 series for promotion. Only confirmed complaints after analysing the call recordings should be shared with senders for response / investigation. Introduce pre-enforcement notification post full testing, provide response window to senders, and a transparent appeal mechanism instead of unilateral punitive action. Besides, a response TAT and mode of reverification of KYC for senders (for first instance) needs to be added for the KYC obligations of the senders towards the OAP 	AI-based detection may result in false positives, particularly for high-volume legitimate banking communication
2	Schedule I	(4)(3)(m) – (iv) to be added	<ul style="list-style-type: none"> For the legacy customer consent base as well as for new customers acquired by senders, the frequency of SMS for consent revocation needs to be specified – ideally it should be kept as 1 SMS to be valid for a year in order to avoid such SMS being viewed by customers as Spam There should be only 1 SMS being sent to subscribers across all the entities (and their various LOBs) whereby the link provided in the SMS should be valid for revoking consents across all entities at any time for 1 year after the SMS is delivered 	Clarity is required for DCA framework to ensure that the consent revocation mechanism is understood by all parties
3	Regulation 25	(4)(f)(ii) Second Proviso	<ul style="list-style-type: none"> Restrict penal action to specific offending telecom resources instead of all resources of an entity. Besides, as per the proviso, the regulations should notify Systemically Important Banks (SIBs) being notified to be covered under the "differentiated criteria" for initiation of action and differentiated sets of enforcement measures 	Blocking all telecom resources can disrupt critical banking services such as OTP delivery and transaction alerts, impacting financial stability and customer trust

We would be pleased to engage further with TRAI and provide any additional inputs as required. Thank you for your consideration.

Since we are unable to create an account for sharing our comments to the Consultation Paper on the TRAI website (screenshot below), request you to kindly consider this email as our formal submission of comments.



Warm regards,

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