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To,
Advisor (QoS),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
(Old Minto Road), New Delhi-02

(Kind attention: Sh. Asit Kadayan)

No: Regln/1-48/2017/6715

Dated: 21st June, 2018

Sir,

Sub:- Draft Telecom Commercial Communication Customer Preference Regulation, 2018-reg.

Kindly refer to your office Press Release No. 58/2018 dated 29-05-2018, vide which TRAI had issued the draft Regulation 'Telecom Commercial Communication Customer Preference Regulation, 2018', and sought comments on the subject matter up to the 18-06-2018.

In this context, this is to bring to your kind notice that majority of the portion of equipment are planned to be replaced by new Regulation. The present SMSCs deployed will not be able to support the new Regulation as additional functionalities such as customer wise time based restrictions etc. are being introduced. The SMSC deployed have been supplied by M/s ZTE and at present, ZTE is not able to respond to our query because of ongoing trade sanctions against them. Any discussion with vendor may be started only after resolution of trade sanction issue.

Moreover, the new IT practices requires to be adopted for implementation of the proposed Regulation. The proposed Regulation is expected to be enforced w.e.f. 1st day of July, 2018. It is not possible for BSNL to change to new IT practices so quickly.

The first para of the new Regulation is to establish Code of Practice (CoP) for entities of eco system that are to be in place as per Schedule I. This Code of Practices are to be submitted to TRAI within three months from the date of coming into force of this Regulation i.e by 1st October, 2018. Further TRAI may propose many other changes which are to be incorporated within 15 days of the receipt of the directions from TRAI.

The new Regulation also propose adoption Distributed Ledger Technology (DLT) with commissioned and private DLT networks for implementation of the system, functions and processes as per para 13 of new Regulation. Every access provider has to establish distributed ledger for complaints and their redressal. These details are to be recorded for three years. The complaints are also to be analyzed against the number of unique respondents and accordingly, the action is to be initiated for restriction of number of outgoing SMSs and number of voice calls during a day and

not allowing SMS/voice. Therefore, technical integration on this aspect is to be analyzed with vendors, which will require time as well as additional financial burden on BSNL.

In view of above facts, it is humbly submitted that the proposed Regulation requires a major change in the present systems and may also require to take on board VAS, services providers. Therefore, technical feasibility is required for going ahead with the proposed Regulation.

This is for your kind information and necessary consideration please.

Yours sincerely


21.6.18
Ved Prakash Verma
AGM (RegIn-II)