

Subject: Fulfillment of regulatory requirements while sending bulk messages, reg.

Dear Partner,

Greetings from BSNL!

Kindly refer to the earlier communications, wherein it was communicated to complete the following activities for sending bulk communication:

- a) Registration as Principal Entity (PE)
- b) Assignment of header
- c) Registration of Content Template
- d) Transmission of PE id, header, Content id while offering for delivery of messages to TSPs.
- e) Registration of consent template (if any)
- f) Acquisition of consumer consent (if any)

In accordance to the regulation, content based scrubbing was implemented from 8th March, 2021, subsequently based on the feedback received by the TRAI, it was observed that some of the principal entities have not fulfilled the requirements as envisaged in Telecom Commercial Communications Customer Preference Regulations, 2018 (TCCCPR, 2018). As a result, their SMS were getting dropped after implementation of the content based scrubbing by Telecom Service Providers. Accordingly, to protect the interest of consumers, TRAI decided to temporarily suspend the content template scrubbing for seven days to enable the principal entities to register their templates. TRAI vide press release dated 12thMar, 2021 conveyed that those PEs who do not comply with the regulatory requirements and failed to fulfill the regulatory requirements, they would not be allowed to send bulk communication using telecom resources. Copy of said press release was also shared in our earlier communication dated 12.03.2021.

Subsequently, TRAI directed to resume the scrubbing as envisaged and in case of failure of the messages due to any reasons (including content id, mismatch of template etc.) same may be recorded, however, message may be allowed to be delivered to the Recipient which was implemented w.e.f. 17.03.2021. During analysis of the scrubbing data, some of the major errors observed are as under, which can be considered before registration of the templates:

Error Code	Reason	Description of error
630	TEMPLATE_NOT_FOUND	No record found with Template Id as primary key/no template found
633	TEMPLATE_NOT_MATCHED	Template not matched for given Template ID
634	HEADER_NOT_REGISTERED_FOR_TEMPLATE	Header is not registered for the template
637	INVALID_TEMPLATE_ID	Received wrong Template id format or no Template id tag.

The Guidelines for Content Template Registration along with API Document are once again attached herewith for ready reference.

It is pertinent to mention that sufficient opportunity has been given to the Principal Entities to comply with the regulatory requirements; the consumers cannot be deprived of the benefits of the regulatory provisions. Accordingly, it has been decided that from

1st April 2021, any message failing in the scrubbing due to noncompliance of regulatory requirements will be rejected.

Accordingly, PEs/TMs are requested to fulfill the regulatory requirements before 31st March, 2021 to avoid any disruption in the communication with the customers from 1 April, 2021. For any inaction by PEs /TMs or because of non-readiness at their end, BSNL shall not be liable for any impact on the services.

For further assistance / queries, please feel free to reach us on:

https://www.ucc-bsnl.co.in/spoc_support/

Kindly Note: As we are observing high surge in registration requests, there could be delays in our response. We shall do our best to resolve your query at our earliest. We appreciate your patience.

IMPORTANT: TRAI letter dated 25.03.2021 for fulfillment of regulatory requirements while sending bulk messages is attached herewith for reference please.

Best Regards,

BSNL Team