Content & Consent Templates: Guidelines for Validation & Verification

Introduction:

In line with the TCCCPR Regulations dated 9th July 2018, Telecom Service Providers (TSPs) are required to offer an eco-system for Principal Entities (PEs) to register their content templates against each of the Headers, registered by a PE.

While registering a content template, there are certain indicative validations against which the templates offered for registration to a TSP by PEs are to be assessed. Therefore, these guidelines are being formulated to act as general guiding rules.

The scope of these guidelines is to ensure that the content templates being registered are aligned with the requirements of TCCCPR 2018 and in terms thereof, the scope of validation is strictly restricted to **Content & Consent Templates**

Content Template Definitions:

1. **"Content Template for Transaction"** refers to a Content Template registered by any sender with the access provider for sending transactional message, service message for the purpose of commercial communication and contains content which may be a combination of fixed & and variable part of content, where the:
   - Fixed part of content is that part of content which is common across all commercial communications sent to different recipients for the same or similar subject;
   - Variable part of content is that part of content which may vary across commercial communications sent to different recipients for same or similar subject on account of information which is very specific to the particular transaction for a particular recipient or may vary on account of reference to date, time, place or unique reference number.

2. **Service Inferred /Implicit:** Service Message (Inferred Consent)
   Inferred Consent has been defined in the Regulation as a permission that can be reasonably inferred from the customer's conduct or relationship between the Recipient and the Sender. Thus, any message, arising out of customer's actions or his relationship with the sender, that is not promotional, and is not in the interest of the customer to block such communications, will be considered as a service message with inferred consent.

   These messages may or may not be triggered by a subscriber-initiated transaction and will not be blocked for subscribers who have otherwise blocked service messages also

3. **Service Message (Requiring Explicit Consent):**
   Explicit Consent has been defined in the regulation as consent that has been verified directly from the Recipient in a robust and verifiable manner and recorded by Consent Registrar as defined under these regulations.

   Thus, any service message which does not fall under the category of service message (inferred consent) will be sent only against explicit, digitally verified/verifiable consent to service message blocked (having preference '0' i.e. fully blocked) subscribers. There may not be any need for explicit consent to all other subscribers, who have not blocked service messages.

"Explicit consent" means such consent has been verified directly from the Recipient in a robust and verifiable manner and recorded by Consent Registrar as defined under these regulations.

4. **Content Template for Promotion** refers to a Content Template, registered by any sender with the access provider for sending promotional message for the purpose of commercial communication and contains content which is fixed content and common across all commercial communications sent to different recipients for same or similar subject.

"Promotional messages" means a commercial communication message for which the sender has not taken any explicit consent from the intended Recipient to send such messages. So, it includes any message sent with an intention to promote or sell a product, goods, or service. Service content mixed with promotional content will also be treated as promotional.

These messages will be sent to the customer after performing the preference and consent scrubbing function as defined in the Regulation.

Consent Template Definitions:

"Consent" means any voluntary permission given by the customer to sender to receive commercial communication related to specific purpose, product or service. Consent may be explicit or inferred as defined in these regulations

Categories of Messages / Templates

- **Messages:**
  - Transactional
  - Service-Inferred/Implicit
  - Service Explicit & Promotional
- **Templates:**
  - Content Template for Transaction
  - Content Template for Service - Implicit/Inferred and Explicit
  - Content Template for Promotion

Basic Checkpoints to be followed for Content Template Registration:

- Fixed part of the content template

- Ensure that the content template contains the content relevant to the category for which header is registered. For instance, if Header is registered for promotional purposes/category, the content template against such a registered Header should also be of promotional nature and similar for service and transactional Header.

- To check content of the template being offered for registration as a transactional template and service message template

- To identify fixed and variable portion(s) of the content in the offered transactional template and service message template with identification of type of content for each portion of variable part of the content, e.g. date format, numeric format, name of recipient, amount with currency; reference number, transaction identity

- To estimate the total length of variable portion, i.e. total length of fixed portion for a typical transactional message, service message for offered template

 The TSPs do not have any obligation nor any mandate under TCCCPR 2018 to check the authenticity / genuineness of the content templates and the Sender is solely liable for the content in the templates.

Examples of Content Templates

For Transactional messages:

- OTP message required for completing a Net-banking transaction.
- OTP message required for completing credit/debit card transaction at a Merchant location.

Actual Message	Template
824926 is the OTP for trxn of INR 57.75 at zaak epayment services Pvt Ltd with your SBI card xx3931. OTP is valid for 10 mins. pls do not share with anyone	{#var#} is the OTP for trxn of INR {#var#} at {#var#} with your SBI card{#var#}. OTP is valid for {#var#}. pls do not share with anyone
032456 is your OTP for fund transfer for amount Rs.3,000 to Ravi. OTP valid for 8 minutes. Do not share this OTP with anyone.	{#var#} is your OTP for fund transfer for amount {#var#} to {#var#}. OTP valid for 8 minutes. Do not share this OTP with anyone.
428684 is OTP for your eCommerce trxn for amount Rs.15,000 OTP valid for 8 minutes. Do not share this OTP with anyone.	{#var#} is OTP for your eCommerce trxn for amount {#var#} OTP valid for 8 minutes. Do not share this OTP with anyone.
369147 is OTP for your premium payment for amount Rs.34,000. OTP valid for 8 minutes. Do not share this OTP with anyone.	{#var#} is OTP for your premium payment for amount {#var#}. OTP valid for 8 minutes. Do not share this OTP with anyone.
852456 is your OTP for BillDesk Payment in NetBanking. OTP is valid for 8 minutes.	{#var#} is your OTP for BillDesk Payment in NetBanking. OTP is valid for 8 minutes.

For Service Messages (Inferred Consent):

- Confirmation messages of a Net Banking and credit/debit card transaction.
- Product purchase confirmation, delivery status etc. from e-commerce websites.
- Customer making the payment through Payment Wallet over E-Commerce website/mobile app and an OTP is sent to complete the transaction.
- OTPs required for e-commerce website, apps login, social media apps, authentication/verification links, securities trading, demat account operations, KYC, e-wallet registration, etc.
- Messages from customer's own TSP.

- Periodic balance information, bill generation, bill dispatch, due date reminders, recharge confirmations (DTH, Cable, Prepaid, Electricity recharges etc.)
- Delivery notifications, feedbacks, periodic upgrades and updates.
- Messages from retails stores related to bill, warranty.
- Messages from schools - attendance/transport alerts.
- Messages from hospitals/clinics/pharmacies/radiologists/pathologists about registration, appointment, discharge, reports.
- Confirmatory messages from app-based services.
- Government/DoT/TRAI mandated messages, advisories, messages from State Govt., LEAs, Local Authorities, Traffic advisories, Election Commission, Disaster Management advisories.
- Service updates from car workshops, repair shops, gadgets service centres.
- Directory services like Just Dial, Yellow Pages.
- Day-end/month-end settlement alerts to securities/demat account holders.

Actual Message	Template
Thank you for using EMI Facility on your IDBI Bank Credit Card 4***3495 EMI request for Rs. 25000.00 executed on 01/07/2019	Thank you for using EMI Facility on your IDBI Bank Credit Card {#var#} EMI request for {#var#} executed on {#var#}
YES BANK - Your new bill for BESCOM Bangalore account 0842948000 for Rs 4339.00 could not get scheduled because auto pay limit is less than the bill amount.	YES BANK - Your new bill for {#var#} account {#var#} for Rs {#var#} could not get scheduled because auto pay limit is less than the bill amount.
account: 674508 is your Samsung account verification code.	account: {#var#} is your Samsung account verification code.
Kindly note that the free look period for your insurance cancellation is 15 days from date of receipt of insurance policy. Regards, Bajaj Finance Ltd.	Kindly note that the free look period for your insurance cancellation is {#var#} from date of receipt of insurance policy. Regards, Bajaj Finance Ltd.
dear k, OTP is 2568 for order id #101794788 at daily orders phone case maker mobile app, kindly enter it to confirm your order. thank you!	dear {#var#}, OTP is {#var#} for order id {#var#} at daily orders phone case maker mobile app, kindly enter it to confirm your order. thank you!

For Service Messages (Explicit) Consent:

Actual Message	Template
Your Rs.500 exclusive voucher is Unused!! Redeem it on purchase of Rs.1,000 at Marks & Spencer. Use code 654321001 Valid till 31st Mar 2020! T&C.	Your Rs.{#var#} exclusive voucher is Unused!! Redeem it on purchase of Rs.{#var#} at Marks & Spencer. Use code {#var#} Valid till {#var#}! T&C.
Bajaj Finserv Personal Loan needs Minimal Documentation. Fulfil your financial needs in one click http://m.BajFin.in/Iphr8tFE T&C	Bajaj Finserv Personal Loan needs Minimal Documentation. Fulfil your financial needs in one click {#var#}.

Hi, in order to best serve you and others, could you click on mosl.co/ywq8FBJpAn to share your meeting experience with Motilal Oswal RM Raju Saha on 22	Hi, in order to best serve you and others, could you click on {#var#} to share your meeting experience with {#var#}

For Promotional Templates:

Actual Message	Template
Lifetime Free ICICI Bank Credit Card with Vouchers from LensKart, Pepperfry, Grabon worth Rs.3000. SMS "apply" to 5676766 TnC apply	Lifetime Free ICICI Bank Credit Card with Vouchers from LensKart, Pepperfry, Grabon worth Rs.{#var#}. SMS "{#var#}" to 5676766. TnC apply
Pay just Rs 640* pm & get Rs 83,333 for 120 months or payout of Rs 1,00,00,000 With LIC*(Life Insurance Cover) For Your Family. http://px2.in/pAD4Tls	Pay just Rs {#var#} pm & get Rs {#var#} for {#var#} months or payout of Rs {#var#} With LIC (Life Insurance Cover) For Your Family. {#var#}
You can win Rs 20,000 in Fantasy cricket use code 542321. Install Qureka Pro app now to WIN Click - https://abc.com	You can win Rs {#var#} in Fantasy cricket use code {#var#}. Install Qureka Pro app now to WIN Click - {#var#}

The indicative rules for content template validation are as under:

Sr. No	Template Validation Points
1	Organization name or their brand name must reflect either in the header or in the template. However, if any exceptions are to be allowed, TSP may seek justification for the same
2	Transaction Content Template is only available for banks, digital wallets duly permitted/approved by RBI
3	Transactional template should contain banking related OTP messages only as mentioned in the definition
4	Service implicit communication type template should contain only service messages and should NOT have any kind of promotion or product updates, both in the fixed as well as variable component of the message/call
5	For banking entities, implicit messages may contain any service SMS other than OTP
6	For non-banking entities, implicit messages may contain all type of service SMS including OTP
7	Any Service implicit template should not contain any content such as insurance/car service renewal, birthday/festival wishes, any kind of offer like eligible for loan, limit enhancement, get cashback wherein anything is being offered to the receiver
8	All templates wherein some promotion is being offered to the customer from an alphabetic sender id must have service explicit communication type
9	All templates wherein some promotion is being offered to the customer from a numeric sender id must have promotional communication type. Example: If HFDC Bank wants to send purely promotional messages, the header must be numeric.

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10	Enterprises can link the promotional or service explicit templates with a consent template ID (optional) during the template registration or later (only once) it shall be visible on the portal. Enterprises can later upload consents against the consent template id which will be used for scrubbing the promotional and service explicit messages
11	The customer can mention {#var#} in the template wherein changes are required, no other value will be considered
12	The whole template should not be variable {#var#}, customer is required to mention the template content in between the variables. The overall content needs to reflect the category of message the PE is wanting to send. Example: Suggested to keep variable length of 20 characters for each variable. 4-5 variables in transactional message 4-5 variables in service message 2-3 variables in promotional messages
13	For each language, vernacular scripts to be added separately on DLT. Unicode scripts cannot be uploaded
14	The fixed part of content is that part of content which is common across all commercial communications sent to different recipients for same or similar subject. The variable part of content is that part of content which may vary across commercial communications sent to different recipients for same or similar subject on account of information which is very specific to the particular transaction for a particular recipient or may vary on account of reference to date, time, place or unique reference number. The template can be either fixed or it may be a combination of fixed part of content and variable part of content. Template with variable content only is not allowed.
15	If PE uses the name of another entity in their templates, the TSPs shall register the same on the presumption that there exists a business relationship with that entity without TSP having any accountability to validate the same. Valid proofs and justification if sought pursuant to any complaints by TRAI/PE shall have to be furnished by the registering PE
16	Within the same category, multiple templates can be linked with single header and multiple headers can be linked with single template
17	Transaction/Service explicit/Service implicit templates can be created under Alpha-headers. Promotional templates can be created under Numeric headers
18	TAT for approval/rejection is 2 working days

"Consent Template or CT" means a template of content which is presented to the customer while acquiring his consent and clearly mentions purpose of the consent and details of sender.

Sr. No.	Rules for Consent Template
1	The consent template should have a link for the receiver to click on the same and provide the consent.
2	The Process/Method/way of acquiring the consent is the responsibility of the Principal Entity.
3	In General, a consent template should look like this: "To receive messages regarding updates and promotions from <Organization Name> please click on the link below: <LINK>"
4	While rejecting any consent template, Registrar comments section needs to be populated.

NOTE:
As consent ID is kept optional, all promotional or Service Explicit contents are being approved with the comment – "Approved on the basis of communication type.
Sender is liable to provide the 'consent' of the customer with the 'terms and conditions' signed by the customer as evidence if any complaint is received against this content."

Disclaimer:
This document is related to guidelines which need to be followed while registering Content and Consent templates and is not a regulation by itself. Tata Teleservices is not responsible for authenticity /genuineness of the content templates and the Sender is solely liable for the content mentioned in the templates.
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