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भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)
BSNL 3G))) BSNL LIVE
Faster than your thoughts. 2010

No. 4-31/2010-Regln/ 1024 dated: 3rd Sep, 2012

To,
Secretary,
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg, (Old Minto Road)
New Delhi-110002

Kind attention: Sh. A. Robert J. Ravi, Advisor (CI & QoS), TRAI

Sub: - Consultation paper on "Review of Telecom Commercial Communications Customer Preference Regulation, 2010"

Sir,

Kindly refer the Consultation paper No. 13/2012 issued on 3rd August, 2012 on the subject cited above. In this context the comments of BSNL are as follows:

S.N	Issue for consultation	Reply
1	What are your views on the proposal of blocking the delivery of SMS from the source or number or entity sending more than a specified number of promotional SMS per hour with similar signatures as proposed in para 2.1.	Proposal seems to be in order
2	What should be the limit on the number of SMS per hour to be specified in this regard? Please give your views along with reasons thereof (para 2.1.1 to 2.1.4).	The limit of the number of SMS per Hour should depend on nature of the SMS and contents therein.
3	Please give your comments on the proposal to mandate the telecom service providers to obtain an undertaking/agreement from registered telemarketers and other transactional entities that in case they want to outsource promotional activities to a third party, they will engage only a registered telemarketer for such promotional activities. What are the other options available to control such activities? Please give your views along with reasons thereof (para 2.2.1 to 2.2.3)?	Such outsourcing should normally not be allowed because it will be difficult to monitor compliance of all such agreements / undertakings.
4	Please give your comments along with reasons thereof on the proposal to disconnect telecom resources after ten violations, of entities for whom the promotion is being carried out? Also indicate whether ten violations proposed is acceptable or needs a change. Justify the same. (para 2.3.1 to 2.3.3)?	The proposal seems to be in order

5	What additional framework may be adopted to restrict such subscribers or entities from sending UCC, other than the one proposed above (para 2.3.1 to 2.3.3)?	No Comments
6	What are your views on the time frame for implementation of the facility for lodging UCC related complaints on the website of service providers? Please give your comments with justification (para 2.4.1 to 2.4.3).	No Comments
7	Do you propose any other framework for registering UCC complaint for easy and effective lodging of complaints (para 2.4.1 to 2.4.3)?	The proposal for lodging UCC related complaints on the website is a reasonably good and easy solution.

This is for your kind consideration.


3/9/12
(Raghuvir Singh)
AGM (Regulation-II)