Guidelines for the validation and verification of content templates:

Introduction:

In terms of TCCCPR dated 9th July 2018, TSP's are required to offer an eco-system for PE's to register the content templates against each of the Headers registered by a registered PE.

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

The scope of the 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
- 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, viz. total length of fixed portion for a typical transactional message, service message for offered template;

Neither the TSP's have any obligation nor any mandate under TCCCPR 2018 to to check the authenticity /genuineness of the content templates and the Sender is solely liable for the content in the templates.

Categories of Messages/calls:

1. **Transactional**
2. **Service-Inferred/Implicit**
3. **Service Explicit**
4. **Promotional**

Definitions:

1. **"Transactional message" : Any message which contains One time Password (OTP) and requires to complete a banking transaction initiated by the bank customer will only fall under the category of transactional. This will be applicable to all banks, national/Scheduled/Private/Government and even MNC banks.**

   Illustration of transactional message:

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

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.

<u>Illustration of Service Message (Inferred Consent):</u>

- 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 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 JustDial, Yellow Pages
- Day-end/month-end settlement alerts to securities/demat account holders

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 doesn't 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.

4. **Promotional Message:** As per the Regulation, Promotional messages means commercial communication message for which the sender has not taken any explicit consent from the intended Recipient to send such messages.

   Thus, 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.

The Headers are to be registered for reach category of commercial communication and against each registered Header, a template corresponding to the category or purpose of Header is required to be registered by a PE. Based on the category /purpose, the Content Templates shall be of the following types:

1. **"Content Template for Promotion**
2. **"Content Template for Transaction"**
3. **"Content Template for Service – Implicit/Inferred and Explicit"**

"**Content Template for Transaction"** means a template of content registered by any sender with the access provider for sending transactional message or transactional voice call and contains content which may be a combination of fixed part of content and variable part of content.

Content Template for Promotion" means a template of content registered by any sender with the access provider for sending promotional message or promotional voice call for the purpose of commercial communication and contains content which is largely fixed content with some minor variable portion and is common across all commercial communications sent to different recipients for same or similar subject;

"**Content Template for Service"** means a template of content registered by any sender with the access provider for sending service message or service voice call and contains content which may be a combination of fixed part of content and variable part of content.

The indicative rules for content template validation are as under:

S. No.	Templates Validation points
1	Organization name or their brand name must reflect in the template.
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 defined in the definition.
4	Service implicit communication type template to contain service messages only and should 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 contains 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 such templates wherein some promo is being offered to the customer from a alphabetic sender id must have service explicit communication type
9	All such templates wherein some promo is being offered to the customer from a numeric sender id must have promotional communication type. Eg. If HFDC Bank wants to send purely promotional messages, the header has to be numeric.
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#}, the customer is require to mention the template content in between the variables. Overall content to reflect the category of message the PE is wanting to send. Eg. Suggested to keep variable length 20 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 a 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 TSP's 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	Templates created with one operator are valid across industry, there is no need to re-register or raise request to multiple operators for registration of the same template.
17	Within the same category, multiple templates can be linked with single header and multiple headers can be linked with single template.
18	Transaction/Service explicit/Service implicit templates can be created under Alpha-headers. Promotional templates can be created under Numeric headers.
19	TAT for approval/rejection is 2 working days.