



Central Depository Services (India) Limited

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COMMUNIQUE TO DEPOSITORY PARTICIPANTS

CDSL/OPS/DP/POLCY/2026/690

October 5, 2026

COMPLIANCE WITH TRAI DIRECTIONS AND GUIDELINES

DPs are advised to refer to Communique no. CDSL/OPS/DP/POLCY/2026/664 dated September 24, 2026, regarding compliance with TRAI directions and guidelines.

In continuation of Point No. 3 of the above-mentioned Communique, Telecom Regulatory Authority of India (TRAI) has further informed the following.

1. TRAI, vide its Direction dated November 18, 2025 (attached herewith as **Annexure A**) regarding pre-tagging of variable fields in SMS Content Templates, had mandated that variable fields in SMS Content Templates be appropriately pre-tagged and subjected to scrubbing and validation. The objective of the measure is to prevent misuse of registered Content Templates and ensure that the variable portion of an SMS is used only for the purpose for which it has been registered.
2. The variable-field scrubbing mechanism has been operating in logger mode since July 01, 2026. Under logger mode, the SMS messages with non-compliant Content Templates are presently being allowed to be delivered but an error is generated against such messages. The error codes generated during the process are supposed to be shared by the Telecom Service Providers with the Principal Entities (PEs) for taking corrective action by them. The logger mode has been allowed only as a transitory measure for enabling PEs to make necessary corrections. However, it is not desirable to continue it for longer periods due to its security implications.
3. Accordingly, TRAI has decided to proceed towards activation of blocker mode which will start rejecting non-complaint SMS traffic. Therefore, timely compliance by the concerned Principal Entities (PEs) is essential to avoid disruption of legitimate commercial communications. In this regard, Access Providers have been directed to extend all assistance to the Principal Entities.

In view of the above, TRAI has advised entities to undertake the following activities on priority to:

- i. Review all SMS Content Templates for compliance but firstly those which have been used during the preceding 90 days, on priority.



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- ii. Identify all variable fields in such templates and ensure that each variable field is appropriately pre-tagged in accordance with the prescribed framework.
- iii. Observe closely for any delivery errors and have close co-ordination with the concerned Access Providers (Registrar of SMS template).
- iv. Complete the aforesaid exercise by October **17, 2026**.

DPs are advised to ensure compliance with the aforesaid requirements within the stipulated timeline.

Queries regarding this communiqué may be addressed to: CDSL – Helpdesk Emails may be sent to: dprtasupport@cdslindia.com and connect through our IVR Number **022-62343333**.

**For and on behalf of
Central Depository Services (India) Limited**

sd/-

**Nilesh Shah
Vice President – Operations**



भारतीय दूरसंचार विनियामक प्राधिकरण
TELECOM REGULATORY AUTHORITY OF INDIA
भारत सरकार / Government of India



November 18, 2025

DIRECTION

Subject: Direction under section 13, read with sub clauses (i) and (v) of clause (b) of sub-section (1) of section 11, of the Telecom Regulatory Authority of India Act, 1997 (24 of 1997) regarding measures to curb misuse of Headers and Content Templates under Telecom Commercial Communications Customer Preference Regulations, 2018 (6 of 2018)

F.No. D-27/1/(2)/2024-QoS (E-13563) - Whereas the Telecom Regulatory Authority of India (hereinafter referred as the “Authority”), established under sub-section (1) of section 3 of the Telecom Regulatory Authority of India Act, 1997 (24 of 1997) (hereinafter referred to as “TRAI Act”), has been entrusted with discharge of certain functions, *inter alia*, to regulate the telecommunication services; ensure technical compatibility and effective inter-connection between different service providers; lay-down the standards of quality of service to be provided by the service providers and ensure the quality of service and conduct the periodical survey of such services provided by the service providers so as to protect the interest of the consumers of telecommunication service;

2. And whereas the Authority, in exercise of the powers conferred upon it under section 36, read with sub-clause (v) of clause (b) and clause (c) of sub-section (1) of section 11, of the TRAI Act, made the Telecom Commercial Communications Customer Preference Regulations, 2018 (6 of 2018) dated the 19th July, 2018 (hereinafter referred to as the “regulations”), to regulate unsolicited commercial communications;

3. And whereas regulation 17 of the regulations provides that the Authority may direct Access Providers to make changes, at any time, in the Code of Practice (hereinafter referred to as “CoPs”) and Access Providers shall incorporate such changes and submit revised CoPs within fifteen days from the date of direction issued in this regard;

4. And whereas the Authority, vide Direction No. RG-25/(6)/2022-QoS dated 16th February, 2023, directed the Access Providers to, *inter alia*, ensure to limit the number of variable portions in content template of messages to two variables only provided that, for the reasons to be recorded, a third variable may be allowed in case of exigency; and ensure that variables in the content templates are non-contiguous and not separated with space, comma and/or any other special characters;

5. And whereas the Authority, vide Direction No. RG-25/(6)/2022-QoS dated 12th May, 2023, in continuation of the direction dated 16th February 2023, referred to in para 4 above, directed all the Access Providers to, *inter alia*, allow, in special circumstances and on requisition with reasons and proper justification from Principal Entity, more than three variables in the content templates, with the condition that each variable in the message template should be pre-tagged for the purpose it is proposed to be used and no information other than that defined in the pre-tagging shall be included in such variables so as to prevent misuse of the content template; ensure use of only whitelisted URLs/APKs/OTT Links/Callback numbers in the content template; and update the Code of Practice accordingly within fifteen days and furnish compliance report of the direction within forty five days from date of issue of the said direction;

6. And whereas item 4 of Schedule-I of the regulations, *inter alia*, provides as under:-

“4. Every Access Provider shall carry out following functions:-

.....

(3) Content Template Registration Function (CTRF)

(j) allow, in special circumstances and on requisition with reasons and proper justification from Principal Entity, more than three variables in the Content Templates, with the condition that –

....

(ii) each variable in the message template should be pre-tagged for the purpose it is proposed to be used and no information other than those defined in pre-tagging shall be included in the variables;”;

7. And whereas the Authority has observed that –

- (a) the directions referred to in para 4 and 5 above have not been implemented till date; and
- (b) in order to ensure implementation of pre-tagging of variables, various meetings were held with all Access Providers and, vide letter dt 05th September 2025, Cellular Operators Association of India (COAI) proposed various tags for Content



Templates, which was agreed to by all Access Providers, including M/s BSNL, in the meeting held on 17th September 2025;

8. Now, therefore, the Authority, in exercise of the powers conferred upon it under section 13, read with sub-clauses (i) and (v) of clause (b) of sub-section (1) of section 11, of the Telecom Regulatory Authority of India Act, 1997 (24 of 1997) and the provisions of the Telecom Commercial Communications Customer Preference Regulations, 2018 (6 of 2018), hereby directs all Access Providers to ensure that—

- (a) Each variable field in every SMS content template shall be pre-tagged with descriptive labels specifying the content type, purpose, and validation criteria, as per Annexure-I attached herewith;
- (b) scrubbing and validation of the tagged variable fields against the pre-whitelist of URLs, OTT links, APK links, and callback numbers within thirty (30) days from the issuance of this Direction;
- (c) all new SMS content templates registered after ten (10) days from the date of issue of this Direction shall be registered only after verifying compliance with clause (a) above;
- (d) remaining content templates shall also be modified to comply with clause (a) above within sixty (60) days from the start of variable tag scrubbing;
- (e) During the initial sixty (60) days from the commencement of variable tag scrubbing, messages may be processed in a logger mode, i.e. messages shall continue to be delivered after generating the relevant fault messages, even if variable tag validation fails. After expiry of this sixty(60) days period, any message failing variable tag validation shall be rejected outright and not delivered.;
- (f) Access Providers shall identify Principal Entities associated with fault messages and intimate them of corrective actions required and consequences of continued non-compliance.

9. All Access Providers are directed to comply with the above directions and furnish to the Authority periodical status reports on the progress, every fifteen days, from the date of issue of this Direction. The updated CoP may be submitted within ninety days from issuance of this Direction.


(Deepak Sharma)
Advisor (QoS-II)

To

All Access Providers

Annexure-I

Tags	Purpose / Example	Validation & Scrubbing Rules
#number# / #numeric#	Numeric values.	Must be digits only. - - No alphabets or special chars allowed.
#url#	Web link placeholder e.g. Track order: #url#.	Must be validated with registered CTA, under Static or Dynamic or Short URL
#urlott#	Web link placeholder e.g. Download App: #url#.	Must be validated with registered CTA, under OTT or APK
#cbn#	Call-Back number placeholder e.g. Call #cbn# for support	Must be validated with CTAs registered under Number (Mobile or Landline or Toll Free)
#email#	Email placeholder e.g. Write to #email# for help.	Must be valid email regex.
#alphanumeric#	Mixed values (ticket IDs, booking IDs) e.g. Booking ID: #alphanumeric#.	- Letters + Numbers allowed -Special chars -Length validation required. Not more than 40 Characters will be allowed in scrubbing

