



DATA PRIVACY

TRAI-RBI Digital Consent Acquisition Pilot: Closing the Legacy-Consent Gap under TCCPCR-2018

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The Telecom Regulatory Authority of India, exercising the consumer-protection mandate conferred by the Telecom Commercial Communications Customer Preference Regulations, 2018 (“TCCCPR”), has joined hands with the Reserve Bank of India to operationalise a confined Digital Consent Acquisition (“DCA”) pilot. The pilot, announced on 10 December 2025, is designed to overcome the single largest impediment that has stalled full implementation of the 2018 consent architecture: the vast universe of “legacy” consents that were obtained through paper forms or proprietary databases and never migrated to the statutory Digital Consent Registry.

TCCCPR-2018 obliges every tele-marketer to record a subscriber’s prior and specific consent in the central registry, makes the communication dependent upon the continuance of that consent, and gives the subscriber an unfettered right to withdraw it. Yet the regulations presupposed that entities would onboard historical data; they did not compel it. The resultant asymmetry where customers could block new solicitations but could not see or retract old ones has entrenched opaque, sector-specific silos and diluted the very transparency the legislature sought to achieve. TRAI’s latest initiative therefore treats the upload and validation of legacy consents not as a clerical afterthought but as a precondition to meaningful subscriber autonomy.

Nine Telecom Service Providers and eleven systematically important banks State Bank of India, Punjab National Bank, Axis Bank, Bank of Maharashtra, Canara Bank, Kotak Mahindra Bank, IndusInd Bank, ICICI Bank, HDFC Bank, Indian Overseas Bank and Punjab & Sind Bank have completed the requisite systems-integration and will participate in the pilot. Each bank is uploading a statistically limited, anonymised subset of previously collected consents onto a shared, protocol-driven platform that interfaces with the TSPs’ billing and messaging engines. The platform itself is a sandboxed version of the eventual nationwide Digital Consent Registry, thereby allowing regulators to stress-test scalability, latency, data integrity and dispute-resolution workflows before general deployment.

Customers whose mobile numbers appear in the uploaded sample will receive a single text message originating from the common short code 127000. The message will encapsulate a standard advisory and a unique, time-bound HTTPS link that resolves to the TSP’s authorised Consent Management Page. No demographic or financial credentials are solicited; access is gated through a one-time token mapped to the mobile header. Once inside the portal, the subscriber may inspect every consent record the eleven banks have lodged against that number, continue it unchanged, restrict it to specific categories, or revoke it outright. The interface simultaneously propagates the revised preference back to the registry and enforces the instruction on the TSP’s SMS firewall, ensuring near-real-time cessation of any further promotional traffic that lacks refreshed consent.

Participation is strictly opt-in and confined to the notified base of subscribers. Subscribers who do not receive the 127000 communications are not affected; their existing preferences under the national Customer Preference Register remain intact. The pilot is accordingly a measured, consent-within-consent experiment: it tests both the willingness of customers to engage with a re-consenting exercise and the operational capacity of banks and TSPs to honour instantaneous revocations without service disruption.

By converting an erstwhile paper trail into an immutable, subscriber-curated digital record, the Authority seeks to fuse the informational self-determination guaranteed under TCCCPR-2018 with the technological neutrality that the Act envisions. If the confined pilot validates the hypothesis that transparency and volume can coexist, TRAI will have paved the last mile toward a spam-free ecosystem where every promotional message is traceable to an informed, revocable and time-stamped consent.

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