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COMMUNIQUE TO REGISTRAR & TRANSFER AGENTS

CDSL/OPS/RTA/POLCY/2025/295

December 01, 2025

TRAI DIRECTION TO MANDATE PRE-TAGGING OF VARIABLES IN SMS CONTENT TEMPLATES

Issuers / RTAs are hereby informed that the Telecom Regulatory Authority of India (TRAI) has issued a Direction dated November 18, 2025 under section 13 of the TRAI Act, prescribing mandatory measures to curb misuse of Headers and SMS Content Templates under the Telecom Commercial Communications Customer Preference Regulations, 2018 (Annexure-A).

The Direction mandates **pre-tagging of every variable field** in SMS templates with descriptive labels indicating content type, purpose, and validation criteria, along with compulsory scrubbing against pre-whitelisted URLs, OTT/APK links and callback numbers. The deadlines notified by the Authority are as under:

1. Within 10 days of the Direction:

All newly registered SMS templates must comply with mandatory variable pre-tagging before approval.

2. Within 30 days of the Direction:

Access Providers must commence automated **scrubbing and validation** of all tagged variables.

3. Within 60 days from commencement of scrubbing:

All existing content templates must be updated to comply with the prescribed pre-tagging standards.

4. During the initial 60 days of scrubbing:

Messages will be allowed in logger mode with fault messages;
After this period, any message failing variable-tag validation shall be rejected outright.

Issuers / RTAs are advised to ensure strict and timely compliance with the adoption timeline and operational conditions indicated therein.



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Queries regarding this communiqué may be addressed to: CDSL – Helpdesk Emails may be sent to: dpertasupport@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



Information Note to the Press (Press Release No. 133/2025)

For Immediate Release

Telecom Regulatory Authority of India (TRAI)

TRAI issues Direction to Mandate Pre-Tagging of Variables in SMS Content Templates to Curb their Misuse in Commercial Communication

New Delhi, November 18, 2025 : The Telecom Regulatory Authority of India (TRAI) has issued a Direction to all Access Providers mandating the pre-tagging of all variable components used in SMS content templates for commercial communication. Variable components typically include elements such as URLs, application download links, or callback numbers that may change from recipient to recipient or time to time, while the rest of the message text remains static.

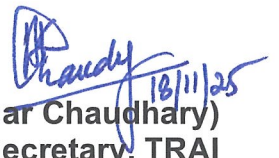
Under the new requirement, senders must explicitly tag each variable field at the time of template registration i.e. must specify the purpose for which the variable is going to be used. For example, tagging a variable as #url# implies that the variable contains a URL. Unless these variable fields are pre-tagged, Access Providers cannot identify or scrub them to determine whether the inserted values are from whitelisted domains, numbers, or links. Pre-tagging therefore becomes essential for automated identification and scrubbing of variable fields.

Evidence from multiple UCC investigations shows that the absence of predefined tagging has been routinely exploited for fraudulent and phishing activities, allowing unregistered or malicious URLs, app links, and callback numbers to be inserted into approved templates without detection. The Direction aims to further strengthen the anti-spam and anti-fraud framework by ensuring complete visibility of variable fields in SMS and enabling Access Providers to apply stringent content scrubbing.

With the introduction of mandatory pre-tagging, these variable elements will now have to be categorized and registered upfront by the principal entities(PE), making them traceable and accountable. This measure represents a significant regulatory intervention aimed at preventing misuse of registered templates, particularly by fraudsters who insert these harmful links and call-back numbers to lure unsuspecting users, many times resulting in financial fraud, data theft and cyber harm.

Access Providers and Principal Entities are required to complete modification of existing templates within a period of 60 days. After expiry of this compliance window, messages sent using non-compliant templates will be rejected and not delivered.

This Direction reinforces the safeguards under the Telecom Commercial Communications Customer Preference Regulations (TCCCPR), 2018 and strengthens TRAI's framework for curbing unauthorized commercial communication. By ensuring that every variable field in commercial SMS is validated before transmission, this initiative is expected to significantly enhance public safety and restore trust in digital messaging channels relied upon for banking, financial services, government and essential services communication.


(Atul Kumar Chaudhary)
Secretary, TRAI