

Ref: CCAOI/ TRAI/ CNAP310123/2

31 January 2023

Shri Akhilesh Kumar Trivedi,  
Advisor (Networks, Spectrum and Licensing),  
Telecom Regulatory Authority of India

**Sub: CCAOI's counter comments to TRAI's consultation paper on Introduction of Calling Name Presentation (CNAP) in Telecommunication Networks**

Dear Sir,

We thank the TRAI for providing us the opportunity to provide our counter comments on the consultation paper on the Introduction of Calling Name Presentation (CNAP) in Telecommunication Networks.

CCAOI is a trust, engaged in capacity building, research and advocacy mostly in India especially related to Internet and digital policies. We represent the interest of different stakeholders of the Internet ecosystem in India, including connected and unconnected users. For over a decade CCAOI, has been advocating, organising capacity building initiatives, webinars, conferences, events and conducting research on issues related to internet governance, telecom and digital policies.

- As we have stated in our submission, we firmly believe that at the outset, it is too early to deploy the Calling Name Presentation (CNAP) supplementary service in India. This is due to several reasons namely:

**From the Infrastructure and Implementation Perspective**

As highlighted by BSNL in their [comments](#), mandatory activation for each user poses challenges with legacy network elements, since in some cases the deployment may require upgradation or complete replacement of the instrument.

Reliance Jio Infocomm Limited in their [comments](#) highlight several challenges at the implementation, based on their research they submit that the primary challenge arises at the device level (i.e. implementation of such a feature at the OEM level needs to be determined, no precedent to determine whether FOTA features can be implemented in landline phones).

**From a data privacy jurisprudence perspective:**

A Data Privacy bill has not yet come into fruition to crystallise the interests of users. In that light, CNAP should be implemented only after the Data Protection Law in India comes into effect so that the rights of users can be protected and there can be an assessment of its impact on individual privacy.

- We would like to emphasise that in case the government still continues to remain inclined to introduce CNAP, the same should occur in the form of a pilot programme to ascertain the effects of introducing such a feature, requiring an in-depth cost benefit-analysis in addition to the same.
- Further, we oppose the idea of CNAP being introduced as a compulsory feature with an ‘opt-out’ mechanism, as proposed. In a country like India where digital literacy and awareness surrounding digital rights still remains scarce, CNAP should be introduced as an alternative and voluntary ‘opt-in’ service which remains optional.
- We would also like to reiterate that the CNAP database cannot be centralised, and needs to be distributive (each telecom operator to its own) to prevent a single point failure.
- In addition to the same, although CNAP may allow the regulator to obtain some information with respect to the users, it does not present a permanent solution to curb the issue of scam calls and fraud.
- Rather than solely relying on a KYC-based identification solution which has its limitations, TRAI should investigate existing or alternative solutions or technologies to provide precision for caller ID systems. For instance, the regulator should examine the existing solutions that are available in the market such as crowd-sourced data solutions, and deliberate along with telcos and such solution providers on how these solutions can be improved and utilized in conjunction with the current prevalent practices.

Thanking you and looking forward to favourable consideration of our suggestions in the interest of growth of the digital ecosystem in the country.

With Regards,

Amrita Choudhury  
Director CCAOI  
[amritachoudhury@ccaoi.in](mailto:amritachoudhury@ccaoi.in)