

ISPAI Response to TRAI Consultation Paper on ‘Introduction of Calling Name Presentation (CNAP) in Telecommunication Networks’

At the outset, we welcome this consultation paper as the proposal of introducing Calling Name Presentation (CNAP) to safeguard the telecom customers from various frauds and spams. Telecom services in the country has supported the digitization of various services and has provided access to banks, payment methods, retail outlets, social media, news, Government services in the hands of the citizens. There persist a menace where the fraudster use the telecom services (calls, SMSs etc.) as a medium to carry out financial frauds. Another menace is the increase in the spam calls which are also happening through the telecom resources where the tele-marketers are calling to general public with the identifier as mobile or land line number. Implementation of CNAP would certainly help in reducing the spam and the frauds happening using telecom resource as it will provide the informed choice to the called party whether to attend a call or not.

We fully support the Authority’s initiative for proposing the CNAP implementation in the Telecommunications networks in India.

Issue wise comments are as follows:

Q1. Whether there is a need to introduce the Calling Name Presentation (CNAP) supplementary service in the telecommunication networks in India?

ISPAI Response:

We firmly believe that there is a need to implement CNAP services in telecommunications network in India. The implementation of TCCCPR 2018 and introduction of CNAP will certainly help the Telecom Service consumers to identify the unsolicited commercial communications (UCCs) from un-registered telemarketers and enable them to respond the calls accordingly.

Q2. Should the CNAP service be mandatorily activated in respect of each telephone subscriber?

ISPAI Response:

Yes, we support the mandatory activation of CNAP service for each telecom subscribers in India. For enterprises Subscriber, such Enterprises should be allowed to use their preferred name as CNAP instead of the name of the Enterprise as captured with the service provider as for many Enterprises the entity name captured from CAF can make confusion to the called party. For

example, Facebook as brand name is popular and everyone is aware of the same, but the company's name is Meta Platform Inc. and the same will be on CAF which is hardly recognizable to general population.

Q3. In case your response to the Q2 is in the negative, kindly suggest a suitable method for acquiring consent of the telephone subscribers for activation of CNAP service.

ISPAI Response:

Not applicable in view of our response to Q2.

Q4. Should the name identity information provided by telephone consumers in the Customer Acquisition Forms (CAFs) be used for the purpose of CNAP? If your answer is in the negative, please elaborate your response with reasons.

ISPAI Response:

Yes, the identity information captured by the telecom service providers in the Customer Acquisition Forms (CAFs) be used for the purpose of CNAP for Individual Retail customers only.

For enterprises customers, approach suggested in response to Q 2 should be considered.

Q5. Which among the following models should be used for implementation of CNAP in telecommunication networks in India?

- a) **Model No. 1, in which a CNAP database is established and operated by each TSP in respect of its subscribers and the name information is sent by the originating TSP to the terminating TSP during the process of call set up; or**
- b) **Model No. 2, in which a CNAP database is established and operated by each TSP in respect of its own subscribers. The terminating TSP dips into its MNP database to determine the originating TSP of the calling party and then performs a CNAP lookup on the CNAP database of the originating TSP; or**
- c) **Model No. 3, in which a centralized CNAP database is established and operated by a third party with an update mechanism from each TSP in respect to their subscribers; the terminating TSP performs CNAP lookup from the centralized CNAP database at the time of receiving a call; or**
- d) **Model No. 4, in which a centralized CNAP database is established and operated by a third party, and individual CNAP databases are established by all TSPs; the TSPs keep a copy of the centralized database and perform local CNAP lookup at the time of receiving a call; or**
- e) **Any other suitable model for implementation of CNAP along with a detailed description of the model.**

ISPAI Response:

We recommend model (d) for implementation of CNAP in telecommunication networks in India. This model will not increase the call set up time. Mobile Portability Data Base (MNPDB) is being maintained by MNP service providers for the purpose of routing the voice calls of ported numbers. PAN India LSAs are divided into two Zones and each zone is being serviced by one MNPSP. MNPSP broadcast the MNP data on daily basis to all TSPs.

Therefore, we recommend that centralized CNAP data base should be maintained by each MNPSP for its zone with the help of respective TSPs. MNPSP can broadcast the updates on the CNAP DB to all the TSPs which would update the CNAP information available locally with each TSP. The terminating TSP then does a CNAP lookup in its own CNAP database, retrieves the CNAP data of the calling party and carry out CNAP presentation to the called customer. This approach will not have any additional load on signaling link and have minimum impact/increase in call setup time.

Q6. What measures should be taken to ensure delivery of CNAP to the called party without a considerable increase in the call set up time?

ISPAI Response:

Please refer our response to Q.5 suggesting the model (d) which would have minimum impact/increase in the call set up time.

Q7. Whether the existing telecommunication networks in India support the provision of CNAP supplementary service? If no, what changes/additions will be required to enable all telecommunication networks in India with CNAP supplementary service? Kindly provide detailed response in respect of landline networks as well as wireless networks.

ISPAI Response:

If the onus for CNAP DIP is posed onto the terminating TSP with CNAP data support from MNPSP then dependency on transit network will be minimized, and hence have less dependency on the overall telecommunication network in India which include networks of Access, NLD and ILD providers. In case of enterprise customer, the end device (PBX, IP Phone, etc.) should also be supporting the CNAP feature. Though we do not support the mandate on the device manufacturer to support CNAP, however, a general advisory / guideline can be issued for the device manufacturer for the provision of CNAP protocols.

Q8. Whether the mobile handsets and landline telephone sets in use in India are enabled with CNAP feature? If no, what actions are required to be taken for enabling CNAP feature on all mobile handsets and landline telephone sets?

ISPAI Response:

Landline phone or mobile handset used by end user from various manufacturer may not be supported with CNAP features. While we recommend having a larger policy for end devices to

have CNAP feature, we are also of the view that this should not be made a mandatory requirement for device manufacturer. CNAP should be a supplementary service and it should be left to the market forces to opt for a device which supports CNAP or those devices which does not support. TRAI may recommend DoT to direct Device manufacturers that they should transparently inform the users regarding CNAP support feature in their devices so that user can take informed decision while going for purchase of the device.

Q9. Whether outgoing calls should be permitted from National Toll-Free numbers? Please elaborate your response.

ISPAI Response:

Yes, outgoing calls should be permitted from National Toll-Free numbers as this will help enterprise to improve customer service to their customers.

Allowing an outgoing call from 1800/1860 numbers would help the Enterprises to have one number which would be displayed to the users for such outgoing calls and having CNAP over the same would further help the users to identify the particular enterprise calls on their phone. Hence, we are of the view that outgoing calls from 1800/1860 should be allowed.

Q10. In case the response to the Q9 is in the affirmative, whether CNAP service should be activated for National Toll-Free numbers? If yes, please provide a mechanism for its implementation.

ISPAI Response:

We recommend model (d) as suggested in our response given to Q5 for activation of CNAP service for National Toll-free numbers. For further details, kindly refer our response to Q5 as above.

Q11. Whether CNAP service should be implemented for 140-level numbers allocated to registered telemarketers?

Q12. If your answer to Q11 is in the affirmative, then kindly elucidate the technical considerations for implementing CNAP service for registered telemarketers so that the name identity of the principal entity may be presented to the called party.

ISPAI Response to Q 11 and 12:

Yes, like the implementation of CNAP for 1800/1860 series making outgoing calls, 140- level number should also be given the option of CNAP and the implementation of the same can be done in line with model (d) as suggested in response to Q.5.

Q13. Whether the bulk subscribers and National Toll-free numbers should be given a facility of presenting their 'preferred name' in place of the name appearing in the CAF? Please elaborate your response.

ISPAI Response:

Yes, the bulk subscribers and National Toll-free numbers should be given an option of presenting their 'preferred name' in place of the name appearing in the CAF. Enterprise customer should be given the option to select presenting their preferred name as many times entity name captured in the CAF is different from their brand name being marketed. Such facility can be enabled in the self-help applications developed by the TSP by authenticating the subscriber.

For example, the registered entity has filled its name in a full form (ex – Punjab National Bank) in the CAF, however, in case such entity wanted to display its CNAP in short form (ex- PNB), same should be allowed. Such provision will help the end customers to take informed decision in responding to the incoming calls.

Q14. In case the response to the Q13 is in the affirmative, what rules should govern the implementation of such a facility?

ISPAI Response:

TSPs providing the telecom service may give such options to their customers after authenticating the authorized signatory of the entity and ensure that such preferred name should be clearly captured in the CAF. In addition, the self-help application/web tools may also be enabled to capture "preferred name" for registered entity.

Q15. Whether there is a requirement of any amendment in telecommunication service licenses/ authorizations in case CNAP is introduced in the Indian telecommunication network? Please provide a detailed response.

ISPAI Response:

Yes, relevant license condition should be amended accordingly to capture and facilitate the following requirements:

- Currently, there is no mandate to display CNAP, license condition should mandate the operators to implement CNAP in their networks.
- There is no field in the CAF form to mention the CNAP. While the name provided by an individual can be used as CNAP, in case of Enterprises all Access service providers should facilitate the Enterprises to obtain their choice of CNAP which can then be captured in the CAF

- Same as MNP service a new clearing house need to be onboarded to maintain the authenticity of the data.

Q16. Whether there are any other issues/ suggestions relevant to the subject? If yes, the same may be furnished with proper justification.

ISPAI Response:

Yes, we welcome the proposal of TRAI for displaying CNAP as it would address the menace of UCC as mentioned in consultation paper. However, there is a cost associated with the implementation of the same, which needs to be reviewed and DoT should facilitate the implementation of CNAP by the telecom operators by providing certain incentives in form of relaxation in the license fee for a limited period.

Also, like MNP Service providers, the CNAP clearing houses would also be required to be paid and for the same a detailed financial model should be created to determine the cost associated with such CNAP clearing house (both CAPEX and OPEX) and who will pay these CNAP clearing houses.
