



MNP INTERCONNECTION TELECOM SOLUTIONS INDIA PVT. LTD. (MITS)

Counter Comments to the responses received for
Consultation Paper No. 13/2022 dated November 29, 2022

on

Introduction of Calling Name Presentation (CNAP)
in Telecommunication Networks

Based on the review of the responses shared by various stakeholders with respect to CNAP implementation, below is the point wise summary from MITS perspective.

Point 1: More than 50% of the stakeholders want the service to be optional and not effected mandatory. While some stakeholders have mentioned individual's data privacy as a concern, others mention that individuals can opt CNAP service by giving consent to share their names / details.

Point 2: Out of the 4 models suggested for implementation of CNAP service in the consultation paper, stakeholders have suggested different models as per their suitability. Maximum stakeholders have selected Model 1, followed by Model 4 and Model 3.

Point 3: Hindrances to implement CNAP as mentioned by many stakeholders in their response indicate the following: upgrade of existing telecom (legacy) infrastructure, dependency on handset manufacturers, lack of standards of CNAP that can be universally followed and high costs of development in network and IT systems.

Point 4: While almost all stakeholders agree that identity of the subscriber can be taken from the CAF form, concerns are raised over the KYC process undertaken by the telecom service providers.

Please find the pointwise counter comments from MITS for your ready reference.

Point 1: More than 50% of the stakeholders want the service to be optional and not effected mandatory. While some stakeholders have mentioned individual's data privacy as a concern, others mention that individuals can opt CNAP service by giving consent to share their names / details.

Counter Comments from MITS: As the subscribers struggle these days with spam and scam calls, it is the need of the hour to identify the caller by the accurate name / company / enterprise. Additionally, the robo calls, fraudulent calls are the biggest concern every subscriber has to deal with. MITS is of the opinion, for successful and effective implementation, it is mandatory to roll out this service without an exception. Issues of data privacy can be addressed by the authorities by making necessary changes in the data privacy laws. We say this because the fraudulent activities (though less in numbers) are far more damaging than to have the subscriber's identity disclosed. Moreover, if every caller is genuine there should be no reason to withhold the name or identity. Any exceptions to this process, in matters of national security, approval from competent authority can be taken for exemption on case to case basis.

Point 2: Out of the 4 models suggested for implementation of CNAP service in the consultation paper, stakeholders have suggested different models as per their suitability. Maximum stakeholders have selected Model 1, followed by Model 4 and Model 3.

Counter Comments from MITS: While the pros and cons of each model have been reasoned in the MITS response submitted earlier, we firmly believe the best model to implement the CNAP service is

Model 4. Similar model is successfully running for the last 12 years in India for MNP service with the same stakeholders. Other major factors that support our decision are mentioned below:

- Same infrastructure by TSPs and MNPSPs can be extended for CNAP implementation.
- Connectivity with all industry stakeholders is already established. It could just be required to augment the capacity (if needed).
- Issues highlighted by the stakeholders of CNAP information not possible to transmit over TDM NWS is not applicable.
- Every TSP will own its local CNAP database and will be able to operationally handle as per their requirement. Moreover, call setup time will be minimal as the CNAP dip will be within the TSP NW.

Point 3: Hindrances to implement CNAP as mentioned by many stakeholders in their response indicate the following: upgrade of existing telecom (legacy) infrastructure, dependency on handset manufacturers, lack of standards of CNAP that can be universally followed and high costs of development in network and IT systems.

Counter Comments from MITS: There is absolutely no second thought that all the mentioned challenges may well exist in CNAP implementation. MITS is thankful to the stakeholders for listing all such issues at the TSP end. Our submission is – CNAP will provide significant benefit to the subscribers and enhance their experience. As a third party, MITS can contribute by implementing the CNAP solution in Model 4 which is setting up a centralized CNAP database and effectively update all TSP managed CNAP database. This is likely to solve some of the existing challenges. We would strongly urge the authorities to permit deployment of cloud based modern solutions for CNAP implementation. This will not only help in saving the upfront CAPEX cost, but also help in implementing a scalable, flexible and sustainable solution.

Point 4: While almost all stakeholders agree that identity of the subscriber can be taken from the CAF form, concerns are raised over the KYC process undertaken by the telecom service providers.

Counter Comments from MITS: The entire purpose of rolling out the CNAP service is to display the accurate identity of the calling party. We also believe that CAF is the most ideal source to retrieve this information. It is for this reason, the KYC process need to be strengthened and watertight. Instances of fraudulent KYC or cases where consumers manage to forge identity documents to obtain multiple SIMs/connections have happened in the past. Unless the existing KYC process is not strengthened and re-verification of suspected connections are done, the entire purpose of CNAP may be defeated. We request the authorities to issue necessary directions in this regard.