To:
Shri Akhilesh Kumar Trivedi
Advisor (Networks, Spectrum and Licensing)
TRAI

From:
Manjunath Bharadwaj Subramanya
Engineer at WhatsApp

Dear Shri Akhilesh Kumar Trivedi,

I am sending my comments for the Introduction of Calling Name Presentation (CNAP) in Telecommunication Networks below and also attaching it as a PDF. Please let me know if any clarifications are required.

Thanks

Manjunath

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

-- Yes. I do believe that this will reduce the prevalence of scams and spam in India. We have many innocent people falling for scams. Even existing caller ID apps cannot help since fraudsters use those apps to impersonate people. There have been well known news reports of people using popular caller ID apps to impersonate politicians, police personnel and so on. Having a trustable name and details will make life better for Indians. It will stop most of the scams and enable us to use our phones again.

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

-- Yes. If it is optional, then the scammers will opt out there by defeating the purpose of this change. It should be mandatory and should be turned off only if there is a court order (for cases like a sensitive person / witness). It should not be turned on for international calls.

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.

-- Yes. This is the best way of identifying people. This will also show us if SIMs have been purchased by one person and used by another. It will cut down on one person providing SIMs to other people which will help improve national security.

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

-- e: Another option is for the terminating TSP to send an SMS with the same details to the called party. This will make sure that as the user gets a call, there is an SMS received with the details of the caller. This will also ensure that there are no delays in call set up time which can continue even if the SMS does not get delivered for any reason. Note that this option will not use CNAP but will use SMS to indicate the name of the caller to the called party. Thus, this will work even if the Telecom networks in India dont support CNAP right now. This might be much cheaper to implement also.

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?

-- The terminating TSP should cache the data for 1 week. This will make the delivery as fast as possible to the called party yet not get too stale when phone numbers are recycled. Since phone numbers are recycled after months of inactivity, this will not affect quality in any way.

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?

-- Android and iOS already come with this functionality to display CNAP (this is worldwide). For feature phones, an option is for the terminating TSP to send an SMS with the same details. This will make sure that as the user gets a call, there is an SMS received with the details of the caller. This will also ensure that there are no delays in call set up time.

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

-- Yes

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.

-- The name should be shown as "Telemarketer BrandName". For example, "Telemarketer SBI Insurance". That way, we can identify who is calling and why and we can then decide to pick the call or not.

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

-- One important consideration is that this data is to be used solely by the telecom networks for indicating the caller to the called person. It should not be used by any other apps or services. For example, a popular app which runs on many Android phones in India can read phone call information and thus compile a list of all numbers and names in India (this database can be built over time) and then publish their own database which can be used outside of the intended purposes (for example for advertising or building a competing service). This data in other apps may be poorly secured and may be stolen by hackers (as has happened in the past) and can have national security implications. So, there should be a mandate that no other apps or services can collect and use this data for any purpose. Reading/Processing/Storing/Collecting this data by other apps/services should be an offence leading to banning the app.