

R B Sahajpal  
Counter Comments  
on  
TRAI CP<sup>1</sup>PR<sup>2,3</sup>

**Introduction:**

**1.Acronym CNAP:**

1.1 This said acronym refers to three words viz; calling, name and presentation. Presently “Calling Line Identification (CLI) means identity of the calling/ originating subscriber in terms of the telephone number assigned as per E.164 1 of ITU Recommendation/ IP Address or any other identification as may be prescribed by the Licensor from time to time.”<sup>4</sup>

1.2 And “At present, all access service providers in India provide Calling Line Identification Presentation (CLIP) supplementary service, as a part of their bouquet of services to telephone consumers. When a telephone consumer receives an incoming call, the telephone number of the calling party is displayed on the called party’s telephone (mobile handset/ landline telephone set), through the CLIP service.”<sup>5</sup>

1.3 CLI & CLIP are in noway near CNAP.

1.4 There are three nudges chronologically dated 21.03.2022 (Annexure-I),11.06.2022,1107.2022 have resulted in this CP. As is evident only one is available in CP.

1.5 ITU defined “Calling name identification presentation (CNIP) is a supplementary service offered to the called party which provides the name information associated with the calling party to the called party.”<sup>6</sup>

1.6 ETSI defined CNAP as ““The CNAP supplementary service enables the called party to receive the calling name information of the calling party.”<sup>7</sup>

1.7 DoT while requesting TRAI for CNAP has not put any limitation for any type of service as “DoT has requested TRAI to explore the telecom network readiness and feasibility of providing CNAP facility to all telephone subscribers (smartphone and feature-phone owners)”<sup>8</sup>

1.8. “[T]he Licensee shall ensure adequate verification of each and every customer before enrolling him as a subscriber; instructions issued by the Licensor in this regard from time to time shall be scrupulously followed.”<sup>9</sup> DoT has issued several instructions in respect of verification of subscribers, which must be followed by telecom service providers (TSPs) at the time of issuing mobile connections to their subscribers<sup>10</sup>.

1.9 In CP three names have been mentioned in support of CNAP<sup>11</sup>.

1.10 The business entities make outgoing calls to their customers from a different set of telephone numbers, which may not be easily identifiable with the respective business entities<sup>13</sup>.

1.11 In U.A.E CNAP has been mandated<sup>14</sup>. and calling party has been taken as an ‘ENTITY’<sup>15</sup>.

1.12 How CLI and CND Services Work<sup>16</sup>.

**Issues for Consultations**

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

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

**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.

**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.

**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.

**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?

**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.

**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?

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

**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.

**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.

**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.

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

**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.

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

**Ans.1.-Ans16.** No specific answer.

**For kind information:**

1. There is no universal attribute is reachable for CNAP (Refer paras 1.1,1.2,1.3,1.5,1.6,1.7,1.8,1.10,1.11,1.12) of the introduction above.

2. Complete information is available in CP as Annexure I CP gives the details of one 'nudge' only out of 'three' (refer para 1.4 of the introduction above).

3. Perhaps three countries mentioned in CP do not use acronym CNAP (Refer para 1.9 of the introduction above).

4. Calling party is taken as an 'Entity' (Refer paras 1.10,1.11 of the introduction above).

5. CLI, CND working has been given in detail but w.r.t to TELSTRA.

**Conclusion:**

The following is submitted for kind consideration:

The CP may be reissued by incorporating:

1. 11.06.2022,1107.2022 DoT letters.
- 2.List of ‘Calling Party Types’ with corresponding ‘CNAP Types’
- 3.A write up similar to the one in reference ‘14’ for various relevant TSP’s operating in INDIA.

#### References

1. [https://traf.gov.in/sites/default/files/CP\\_29112022.pdf](https://traf.gov.in/sites/default/files/CP_29112022.pdf)
2. [https://traf.gov.in/sites/default/files/PR\\_No.78of2022.pdf](https://traf.gov.in/sites/default/files/PR_No.78of2022.pdf)
3. [https://www.traf.gov.in/sites/default/files/PR\\_No.83of2022.pdf](https://www.traf.gov.in/sites/default/files/PR_No.83of2022.pdf)
4. para 1.3 supra ‘1’.
5. para 1.4 ibid.
6. para 1.12 ibid.
7. para 2.1 ibid
8. para 2.2 ibid.
9. para 2.7 ibid.
10. para 2.10 ibid.
11. <https://dot.gov.in/access-services/subscriber-verification>
12. Para 2.14 ibid.
13. Para 2.37 ibid.
14. <https://www.csagroup.org/global-certification-regulatory-update/united-arab-emirates-tra-calling-name-presentation-cnap-for-mobile-phones/>
15. <https://www.etisalat.ae/en/consumer/support/mobile/cnap-faq.html>
16. <https://www.efa.org.au/Issues/Privacy/cni-technical.html>