



17 January 2023

Shri Akhilesh Kumar Trivedi,
Advisor (Networks, Spectrum and Licensing)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi – 110 002

Subject: Tata Communications Ltd. comments to TRAI Consultation Paper on 'Introduction of Calling Name Presentation (CNAP) in Telecommunication Networks'

Dear Sir,

This is with reference to the TRAI Consultation Paper No. 13/2022 dated 29-11-2022 on aforementioned subject.

In this regard, please find enclosed herewith Tata Communication Limited's comments for your kind consideration as Annexure -I.

We request you to kindly consider our inputs while finalizing the recommendations and would be happy to provide any additional information, if required.

Thanking You,

With kind regards.

Yours Sincerely,

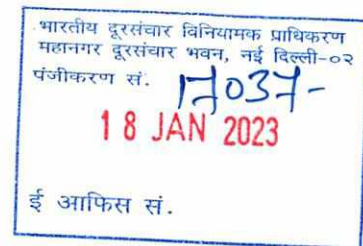
For Tata Communications Limited,

Praveen Sharma
Authorized Signatory

Enclosed: As mentioned above

Cc:

1. Shri V. Raghu Nandan (Secretary), Telecom Regulatory Authority of India, Mahanagar Doorsanchar Bhawan, New Delhi.
2. Shri Rajiv Sinha, Pr. Advisor(NSL) Telecom Regulatory Authority of India, Mahanagar Doorsanchar Bhawan, New Delhi.



TATA COMMUNICATIONS

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Tata Communications Limited Response to TRAI Consultation Paper on 'Introduction of Calling Name Presentation (CNAP) in Telecommunication Networks'

At the outset, we welcome the issuance of this consultation paper as the proposal of introducing Calling Name Presentation (CNAP) is necessary to safeguard the telecom customers from various frauds and spams. While the penetration of 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, it has also created a menace where the fraudster and criminals use the telecom services (calls, SMSs etc.) as a medium to do financial frauds with the general citizens. Another menace is the increase in the spam calls which is also happened through the telecom resources where the tele-marketers keep calling to general population and in absence of any identifier, the people attend such calls. Having CNAP would certainly help in reducing the spam and the frauds happening through telecom networks as it will provide the choice to the called party whether to attend a call and if attends, the called party would be aware about the person, in case of individual, or business, in case of an Enterprise, and can be alert about anything which may seem out of line.

Implementation of CNAP would also create a threat for the spammer and fraudster as it will provide his/her identification instantly to the called party basis which subscriber can decide to attend the call. Considering the above, we fully support the Authority's intent for proposing the CNAP implementation in the Telecommunications networks in India.

Tata Communications 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?

Tata Communications' Response:

Yes, as outlined at the beginning of our 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 genuine calls

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

Tata Communications' Response:

Yes, it should be mandatorily activated for each telecom subscribers in India. For enterprises Subscriber, who opt for bulk connections, such Enterprises should be allowed to use their name, acronym, brand name etc. as CNAP instead of the name of the Enterprise as registered with the service provider as for many Enterprises the entity name captured from CAF can make confusion to the called party for example, Domino's as brand name is popular and everyone is aware of the

same, but the company's name is Jubilant Food Works 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.

Tata Communications' 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.

Tata Communications' Response:

Yes, the identity information provided by the telephone consumers in the Customer Acquisition Forms (CAFs) be used for the purpose of CNAP for Individual 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.

Tata Communications' Response:

Tata Communications recommends model (d) for implementation of CNAP in telecommunication networks in India. This model will reduce the call set up time. Currently, MNP 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, it may be worth considering that centralized CNAP data base should be maintained by each MNPSP for its zone with the help of respective TSPs. MNPSP can at a particular time frame, which may be decided by TRAI, 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 does a CNAP presentation to the called party. This approach will not have any additional load on signaling link and have miniscule 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?

Tata Communications' 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.

Tata Communications' Response:

If the onus for CNAP DIP is on terminating TSP then dependency on transit network is minimized, and hence have less dependency on the overall telecommunication network in India which include networks of Access, NLD and ILD providers. It may also be noted in case of enterprise customer the end device (PBX, IP Phone, etc.) should also be supporting the CNAP feature. While we do not support to make it mandatory on the device manufacturer to support CNAP, however, a general advisory / guideline can be issued for the device manufacturer for facilitating the 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?

Tata Communications' Response:

End device (Landline phone or mobile handset) procured by end user from various device manufacturer may not be enabled with CNAP features. While we recommend having a larger

policy from Govt. 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 would be a supplementary service and it is the choice of a user 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.

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

Tata Communications' Response:

Yes, allowing outgoing calls as this will help enterprise to improve customer service/support to their retail supplier.

The retail user will also know who they got call from if in case they missed it. Today, under existing guidelines that regulates commercial communications have 140 series for such commercial calls. Since 140 calls have mostly been used for promotion, the general public is now aware that any call coming from 140 is a possible telemarketing call. Also, such 140 calls are barred if customer choses fully/partially blocked category. In this scenario, the enterprises who are genuinely required to contact their customers as part of sales/after sales service or to provide any specific information resort to use the fixed line/mobile numbers. Allowing an outgoing call from 1800/1860 numbers would help the Enterprises to have one pilot 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.

Tata Communications' Response:

Tata Communications recommends 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.

Tata Communications' Response to Q 11 and 12:

Yes, similar to the implementation of CNAP for 1800/1860 series making outgoing calls, 140- level number should also be under the purview of CNAP and the implementation of the same can be 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.

Tata Communications' Response:

Yes, 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. 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.

For instance, although the registered entity has filled its name in a full form (ex – State Bank of India) in the CAF, however, in case such entity wanted to display its CNAP in short form (ex- SBI), same should be allowed. Such provision will help the called parties to take informed decision in responding to the incoming calls.

It is also pertinent to highlight that the end device may not have the option to show the entire complete full name as provided in the CAF / short name as its preference. Please refer our response given to Q8 for further information.

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

Tata Communications' 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. Further, it is suggested that the self-help application/web tools may also be enabled to capture "preferred name" for registered entity. The method currently in use for SMS Header registration under TCCCPR, 2018, can be implemented to facilitate the Enterprises with the short name/brands which they intend to use for CNAP.

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.

Tata Communications' 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. We have suggested that approach similar to SMS Header Registration by an Enterprise as currently being done under TCCCPR, 2018 framework. An Enterprise registering its CNAP/brand with one service provider can use the same CNAP/brand for obtaining bulk connections from another service provider and the CAF format should have the option to capture such CNAP.
- 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.

Tata Communications' Response:

Yes, we welcome the proposal of TRAI for displaying CNAP as it would address the menace of UCC as mentioned in consultation paper up to a large extent. 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, similar to 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.
