



*Consultation Paper on
"Introduction of Calling Name Presentation (CNAP)
in Telecommunication Networks"*
Comments by Tata Teleservices Limited & Tata Teleservices (Maharashtra) Limited

At the outset, Tata Teleservices Limited and Tata Teleservices (Maharashtra) Limited [together called "TTL"] express our sincere gratitude to Telecom Regulatory Authority of India (TRAI) for releasing Consultation Paper on '**Introduction of Calling Name Presentation (CNAP) in Telecommunication Networks**' and calling for stake holders' comments.

In this respect we, TTL, would like to submit our response to the issues and concerns as mentioned in the Consultation Paper is as follows:

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

Ans:

Calling Name Presentation (CNAP) functionality is good to have functionality with new deployment of core network as legacy deployment may not support these features. Such functionality required to be implemented progressively in the supported network with selected user group.

CNAP may serve as a good to have reliable supplementary service which would provide the details of the calling party to the party receiving the call. This service would enable the customer with the option to accept any call which he desires. Further, subscribers also have access to similar services from crowd sourcing apps, such as True Caller are already available and are being used by the subscribers.

We would like to submit here that implementation of CNAP should NOT be mandatory and should be optional for the TSPs. Implementation of CNAP should be left to TSPs and they may consider implementing the same keeping the market dynamics / business case in mind. In case TSPs see value in providing this supplementary service of CNAP, they may do so as per their own will and timing.

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

Ans:

CNAP services should start with limited subscriber base and can be enhanced for large base as per requirements.



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.

Ans:

Implementation of CNAP should be optional for the TSPs. In case a TSP opts to implement CNAP, the consent for the CNAP service may be taken from the customers through OTP based app or SMS to prevent any fraud for activating the service, similar to the online shopping where OTP is sought before the payment is made. The OTP based consent is more secure since the same is accessible only to the mobile phone user.

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.

Ans:

Yes, name identity information can be taken from CAF.

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.

Ans:

Model No.1 and Model No. 4 are preferable models but model 1 will required development for creating independent subscriber database whereas model 4 will use common database



among all operators. It requires further deliberation for technical and commercial viability point of view.

Moreover, since each of the above model for implementation of CNAP involves dipping in the CNAP database, the same will lead to an increase in Call Set Up 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?

Ans:

Call setup time is expected to increase with such implementation. If all users need to be configured with CNAP then it will add to more loading on the IT and network platforms.

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.

Ans:

In wire-line telecommunication network, provision on CNAP supplementary services is not completely supported with legacy platforms. Further new feature implementation and testing required to be done basis the model which is finalized after due deliberation. Legacy platform can be progressively migrated to new platform supporting this functionality.

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?

Ans:

Not all landline telephone sets are enabled with CNAP feature. For making all landline telephone CNAP enabled, supported handsets/equipment need to be procured by the customers.

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

Ans:

For service calling separate number series may be provided. As far as tollfree numbers are concerned, it requires IT changes to accept 1800 series as subscriber series along with routing changes at the core platforms.



Moreover, subscribers are already aware of the various Toll-Free numbers and thus providing CNAP feature on the toll-free numbers would be of limited benefit to the consumers. Further with call rates being very low, Toll-Free numbers have lost their popularity and demand.

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.

Ans:

CNAP can be activated on Toll free numbers.

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

Ans:

CNAP service should be implemented for 140-level numbers.

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.

Ans:

It required testing with detailed discussion with OEMs

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.

Ans:

For specific cases it can be allowed but it need validation mechanism before accepting such deviations.

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

Ans:

Documentary proof can be shared by the customer before preferred name is added in the network. It need further deliberation before implementation for feasibility.



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.

Ans:

Yes as 1800 is tagged as toll free numbers in the current license.

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

Ans:

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