

To,
Shri Akhilesh Kumar Trivedi, Advisor (Networks, Spectrum and Licensing),
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan (Opp. Ram Lila Gr.),
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Dear Sir,

Subject: VOICE Comments on TRAI consultation on “Introduction of Calling Name Presentation (CNAP) in Telecommunication Networks”

We at VOICE as part of our advocacy initiative in Telecommunications continuously raise different issues with Policy makers impacting consumers based on the knowledge through Consumer feedbacks. As registered CAG with TRAI we are in forefront of providing inputs to TRAI related to consumer concerns and interests.

In continuation of this effort on behalf of telecom consumers we at VOICE have following response to the questions posed in the consultation paper:

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

Yes, it is highly desirable for consumers for following reasons-

- ✓ *There is genuine need as consumers are already using various commercially available such information sources which are neither reliable nor authenticated*
- ✓ *It will provide a more robust, reliably sourced alternative*
- ✓ *It will be a very effective tool in controlling Unsolicited calls/messages*
- ✓ *This will also effectively control unauthorised multiple SIM ownership.*

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

Yes, for all subscribers.

Of course, with safe guards and exceptions for security reasons.

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.

Yes, CAF is the right information source. It will also put a double check on the CAF process and its accuracy and help monitoring TSPs' working.

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

A centralised CNAP is the best option.

(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.

This centralised CNAP should be managed by constitutional entity amenable to RTI and other regulations available under consumer protection.

It can be something on the lines of TCCCPR, making it an independent authority, integrating all consumer centric facilities with it.

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?

Practically the difference will not be noticeable. CNAP referencing may not be more than a second. As it is we live with multiple technologies (like 2G=>3G=> 4G=>5G) which adds its own call set-up delays. As it is centralised CNAP will add minimum circuit time among all options. And 5G tech will anyway provide higher network speeds.

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.

In our considered opinion the existing network is capable of incorporating this CNAP provision as no hardware changes are expected.

As for the landlines, most of new additions are through fibre cables providing more robust environment in terms of bandwidth and speed. So no technological hindrances are expected in landline network either.

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?

In our opinion current handsets are capable of handling centralized CNAP application because calling number anyway is being displayed on all current handsets (both feature and smart phones). Same is applicable for but only for landline handsets with display- all the fiber-based landlines are anyway are display enabled.

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

Yes, as long as ownership can be clearly identified by the call receiver it should be permitted. May be with an additional registration requirement of purpose of the Toll-Free number like promotion of which category of product or service in line with the categories defined under UCC.

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.

Toll-Free numbers with calling facility should be treated like any other mobile number and should be included in CNAP.

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

Yes, more so because these are major originator of unwanted calls. Consumers can than decide to attend or not attend to these calls or even block them individually.

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.

We can treat them as any other mobile or land-line number and can include them in the CNAP database.

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.

Yes, we can allow this option but names which can be easily identified with this tele-marketer by the consumers like say their registered trade names.

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

As stated above-

- Names allowed should be identifiable with the connection owner
- Preferably product / service name OR registered trade name OR company name
- Consumer should easily be able to identify with the product / service on offer and its ownership
- No possibility of pseudo promotion for restricted goods or services
- Promotion of only legal products / services

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.

Persons with thorough legal knowledge should rightly comment.

But, TRAI should mandate this service.

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

Our comprehensive suggestion is that number allocation should be centralised, the same authority in the long run should provide mobile/landline numbers to consumers registered in their name. Anyway, MNP ensures almost life-long assignment of numbers to an individual consumer. By registering numbers to an individual, problems like authenticity, accuracy, legal recognition and cybercrime through mobile numbers can be overcome to a great extent.

Yours' Sincerely

16th January 2023

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