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SUB: Introduction of Calling Name presentation (CNAP) in Telecommunication Networks

To
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Respected Authorities,

The following inputs/comments w.r.t above Subject & Reference:

Chapter-1:

1.5

“clip services does not adequately meet”

Basis of above point is also to be mentioned, otherwise this may be considered as assumption only.

1.7

“most of such calls are UCCs”, “even genuine”

Basis of above point is also to be mentioned, otherwise may consider as assumption only.

1.8

“Robo / Spam call”

logic is missing, that how CNAP can address this.

“Dupe”

Possibility of duping by using similar name through CNAP--- this dimension is missing.

“Personal mobile connections”

DND is not solution for this purpose.

Strengthen the present complaint handling mechanism or need a separate complaint handling system to solve this particular category of calls originated from such personal numbers.

1.9

“CLI Spoofing”

If CLI spoofing is possible, then there is chance of “CNAP Spoofing” also.

1.10

“Third Party APPs”

Anyone who installed such apps, may have right to give permission to their own data, but not details of other persons. While using such APPs, the phone-book data is being utilized by such APPs, leading to privacy loss of all the numbers who are in that mobile phone-book/contact list.

This problem is to be addressed by authorities.

1.11.

“Protection”

How it will be protected – is not clear.

1.13.

“reduce the harassment”

How it was concluded that it will reduce?.....any research done or simply an assumption?

“CNAP feature”

Instead of “un-know number”, will get “familiar name” or “Un-known name”

1.13 (f)

“latency”

What is tolerable standards, and what is present status – is to be mentioned.

Chapter-2:

2.2

Length of CNAP is to be prescribed

I.e. number of characters that are to be presented in the CNAP

Language – choice of language of CNAP is to be given to the called party

CLI- is number, people are habituated to understand numbers 1, 2,.....
CNAP – is name, is to be presented in a language known to the called party
All 16 languages are to be allowed to choose

2.4.

“consumers have expressed”

Survey might have been conducted among 125 cr. Subscribers. The results of this survey is to be published.

If, not conducted any survey, at least now, need to conduct a survey among all subscribers. To overcome third party’s interests, or biased survey, it is suggested to conduct a direct survey among all subscribers and publish the results for transparency.

2.5

“Crowd-sourced”

Whether such method is legal or not? is to be reviewed. If not legal, need to do action accordingly.

To protect the personal data, adequate action is to be taken, through techno-legal audit.

Such, techno-legal audits are to be conducted by authorities. If conduction of such audits are not under DOT, necessary unit is to be suitably asked to do same.

2.6

“actively seeking”

Survey might have been conducted among 125 cr. Subscribers. The results of this survey is to be published.

If, not conducted any survey, at least now, need to conduct a survey among all subscribers. To overcome third party’s interests, or biased survey, it is suggested to conduct a direct survey among all subscribers and publish the results as a part of transparency practices.

“Spam calls etc.”

How, authority concluded that CNPA is going to address such issues?

2.7.

“empowers”

How, authority concluded that CNPA is going to empower?

2.8

Q1

Need?

Keeping in view of inputs provided as above under chapter-1 and chapter-2.

Cannot say Yes or No (**or**) Yes and No.

Not only limited to telecommunication network, it is to be considered for OTT apps viz., social media calls and IP calls also.

Tomorrow, it may also assume something and decide, to present calling party’s “gender” “Age”, “Location”, etc.... where is the limit to this presentation?

Phone Number belongs to Tele-service provider, so, presenting it as CLI is logical.

Name of the subscriber is not belonging to Tele-Service provider, it is the personal information of the subscriber, so presenting it as CNAP is not logical.

Q2 & Q3

Calling party, have to declare, whether the name is to be presented to called party or not.

Called party need to declare whether to receive Calling party name or not.

If called party wishes to receive name of calling party, then the “language” in which the calling party name to be displayed also to be declared.

Who will meet the implementation cost?

To cover this cost, it is to be offered as a paid service.

If, it is supposed to offer free of cost, the cost of implementation is to be borne by DOT.

2.9, 2.10

“Correct name”

Service providers need to check, “**physically**”, to confirm correctness of the proofs submitted by subscribers along with CAF.

“Correct Name” means, it is as in “Aadhaar” card of present user?

In these 2 decades, CAF rules changed numerous times.

Over a period, many original subscribers were expired and those phone connections are being used by the family members, without change of CAF name.

Phone connections normally taken on the name of parents and to give their children/elderly family members. Companies allot phone connections to their staff, many time it happens, even after they left from that company, they use to continue to use those connections, even that was taken on the name/designation of that company.

Many do not know, whether their connection is on their name or not?
Connections might be functioning, even CAFs have been interchanged by mistake during back end process.

At least now, ask all service providers to send message (text/voice) to subscribers, mentioning their name as per TSP's records/database. If any discrepancy, it is to be addressed by concerned TSP.

Many other services (online or offline) are being provided basing on the OTP sent on mobile number.

2.11

"are verified"

"later by authorized representative of TSP"

As of present practice, the POI or POA are checking by asking the originals as a part of verification. By simply seeing the "said original documents", it is not possible to ascertain the originality of those POI or POAs. Due to present technological advancements, duplicate/fake documents are being generating and it is not possible to identify the originality of any documents, by "visual judgement". Hence, at POS, there are much chances of mistake in identifying the originality of all types of POI / POA.

If, authorized representative of TSP, physically verified the Address & Person, by visiting to the address and by meting the person, then, there is possibility of fact check of POI or POA. But, in present day practices, no physical verification is happening, so the originality of POI/POA is a big question mark. (earlier there was practice of verification by TSP by physically visiting the subscriber location. As of now, this practice is no more.)

Therefore, there are much chances of uncertainty of the checking of POI/POA by TSPs in the present process.

Q4.

No.

Reasons: As explained under above 2.9, 2.10 & 2.11

2.14

"official documents to prove their legitimate right to use these names"

The method of issue of such documents & verification of those documents that they are genuine or not is also to be studied. (check the inputs as above under 2.11 in this regard also).

Q5(e)

Model-5.

Try for an Indian model of doing it in Aatma Nirbhar way.

TSPs may store name of subscriber name (SN) as a suffix to their number, i.e CLI+SN.

I.e. the length of CLI is to be expanded as (CLI length + SN length)

Do necessary modification in concerned protocols.

Whenever CLI lookup happens, both CLI & SN can be retrieved simultaneously.

When ever CLI presented, CLI+SN can be presented.

If technically feasible, this might be less cost of implementation as well no impact on existing latency of call establishment.

2.28 & Q6

"latency"

What are all the existing standards of call processing latency?

What is the present status of quality of call processing before and after implementation of MNP ?

This is essential before taking up CNAP, because it adds additional call set up time and impact the quality of services.

Users are already observing lot of delay while establishing a voice call.

CNAP should not add more delay.

Check the possibility of "Model-5" (as proposed above against Q 5 (e))

Q8.

If instrument is not compatible to receive CNAP, call is to be established without any issue.

Q9

"Users call toll-free number of a company for some purpose, later the company call back to that user from some other number (un-known)"

This point brought to authorities notice many times to provide toll-free number as CLI as it was done for registered telemarketers for 140 level.

Customers call a company on their toll or toll-free number (i.e 1900 or 1800 series). Later, companies are calling-back their customers from their normal phone numbers, and customers many times un-aware that, that call is from that company. So, instead of presenting CLI of those normal phone numbers, it is suggested to provide CLI of concerned toll-free number. For this purpose, an application is to be taken from that company.

2.41

There is a possibility of duping called party, if the telemarketer keeps a similar name of a prominent business/firm/company name. Need to address this problem.

Q11

No

By seeing CLI starting of 140xxx level, customers aware of the call from telemarketer.

Tele-marketers normally call on behalf of some other entities, there is no use of presenting telemarketer company name to called party.

2.43.

“bulk subscribers”

The size of bulkiness not mentioned.

Also, refer inputs provided vide above 2.14.

“Preferred name”

If this preferred name is similar to any other entity, the trouble of called party multiplied.

2.44

Instead of CNAP, CLI of 1800 or 1900 level is to be provided for the call made from National Toll Free owners, as explained above at Q9.

Q.13

No

Bulk Subscribers may keep “preferred name” similar to other entity. Duping the called subscriber made simple.

For, National Toll-Free Numbers... can be provided 1800 xxxxxx number as CLI.

Already users are experiencing issue of SMSs are received from SMS short codes which are looks like (similar to) of popular entities.

Q15.

Traditional voice calls/SMSs are reduced and there is drastic increase of calls/messages communication over social media/IP based networks/APPs.

This observation is very much important while framing future regulations/policies.

Should be for all types of communications same regulation is to be in place. So the messages/communications made in non-telecommunication networks like social media networks (WhatsApp, Kuhoo, etc.) & IP based calls also to be covered under these regulations.

Q16.

Small screen:

The number of characters displayed on normal phones/small screen devices is very less. While ringing, it is possible to see CLI, but not CNAM due to less screen size.

SMS:

SMS scenario not covered in this document.

Strengthen the subscriber verification system:

Physical verification of subscriber is to be made mandatory whether CNAP introduced or not.

TSP should have facility to check the originality of the POI/POA documents.

TSP should have facility to check the originality of various documents provided by companies/firms/entities.

TSPs need to spent considerable amount for “Subscriber Verification”.

Important:

Many other service providers (off-line/on-line) are using OTP sent on mobile number as a process of verification of their subscriber. If, TSP failed in proper verification of their subscriber, the mistake will be multiplied due to this “OTP” verification process made by many other service providers.

Test Name:

Once in a year, TSPs need to confirm the name of the subscriber by sending “Name SMS” alert to all their subscribers.

Sample SMS:

Dear Subscriber, your details as per our records are “name: aaa bbb cddd”, “address: eee, ffff, ggg,hhhhh, iiii,jjj”, if noticed any discrepancy, please call our customer care on 1800 xx xxxxxx or visit our service centre to update details. We are conducting physical verification shortly, if details not matched, subscription of this number will be closed/stopped.

Language is to be considered.

Within ringing time, called party able to read the name, here the language of CNAP plays major role. Hence, Language is important. All official languages of our Nation is to be taken in to account.

Length of CNAP is to be defined in terms of number of characters

Confusion of 2 names:

Basing on CLI, the name stored in the subscriber device will be displayed on the screen (Stored Name)

Now, in addition to that, one more name will be presented due to CNAP.

This creates confusion.

Sometimes, the combination of these two names (stored name + CNAP) give a new name.

Example:

If stored name: Narendra

If CNAP is: Mishra

The combination gives different name as “Narendra Mishra”

The limitation of time to answer (i.e before ringing time ends) creates more confusion.

Complaint:

If, a called subscriber identified any wrong CNAP, then,

Who will deal it?

How it will be dealt?

In the MNP scenario, called party cannot identify concerned calling party’s TSP

So, one more complaint mediation platform required. Need to define business rules for that complaint handling mechanism.

Administrators responsibility increases. Leads increased governance cost.

Tele-communication Network:

All the social media APPs/IP communication systems, etc are also to be considered as telecommunication networks.

Cost viability:

Voice calls are made free/un-limited by all TSPs. No call charges as like, STD/Local or Roaming.

Now, mobile tariff is based on “data” only.

TSPs are not at all earning on voice/SMS services.

How, TSPs will spend/invest to upgrade their networks to implement this CNAP facility?

Seems, not logical. Not viable.

With regards

Vas KSS