

BIF Response to TRAI Consultation Paper on “Introduction of Calling Name Presentation (CNAP) in Telecommunication Networks”

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

A. As regards the need to introduce the Calling Name Presentation (CNAP) supplementary service in the telecommunication networks in India, the Consultation Paper (CP), has given the following background:

- **The telephone consumers have raised a concern that in absence of the calling party name presentation facility, they prefer not to attend calls from unknown telephone numbers**, as most of such calls are unsolicited commercial communications (UCCs) from un-registered telemarketers and as a result, **even genuine telephone calls go unanswered**;
- The telephone consumers have also raised their concern in respect of **robocalls, spam calls, fraudulent calls and call spoofing**;
- To address the UCC issue, TRAI had in TCCCPR, 2018 mandated all access service providers “to take initiatives to enable calling name display (CNAP) based on Intelligent Network or ISDN based protocols, enhanced calling name (E-CNAP) functionality as defined in 3GPP technical specifications TS 24.196 for providing services to terminating user with the name associated with the originating user and optionally delivering metadata about that originating user.
- There are **third party apps** and/or native smart phone tools are available to identify the name of called party but the same **cannot be relied upon as they are crowd sourced**.

B. We agree with TRAI’s statements in the CP that the telephone consumers continue to face the issue of UCC and fraudulent calls. This is despite many initiations and efforts by TRAI, DoT and the telecom service providers. **The telephone consumers are vulnerable to calls that they do not recognise and hence most consumers may not answer any of such calls, even if they are legitimate calls.**

C. **Further, online transactions play vital role in the present era of Digital Growth.** In Indian context UPI, RTGS, IMPS have emerged as a lifeline of the financial system. RBI has promoted its 24X7X365 availability, interoperability and brought in various other initiatives, which are a boon for common man in terms of convenience and cost. UPI, which was hardly known a few years back, has

monthly volume of more than 730 crore transactions and monthly value of about Rs.12 lakh crore. **The digital growth levels have far exceeded the corresponding digital literacy levels, considering the adoption of online payment by all the sections of the society, bringing India in the forefront. This raises concerns due to online payment frauds like vishing/spam calls, specially where customers are new to the products or they may unknowingly divulge bank/credit details. Much to the credit of agencies involved, the extensive measures taken for customer education and awareness have been instrumental in safeguarding customers from online frauds and protecting their rights. Further, any additional measure to curb such spams or frauds is more than welcome.**

- D. We, therefore, agree with DoT's views that the introduction of CNAP facility in telecommunication networks will empower subscribers to take an informed decision while receiving an incoming call and will reduce the harassment of subscribers from unknown/ spam callers.
- E. **CNAP's effectiveness will depend on the veracity of the database of consumer names and other measures in place to curb the UCC/fraudulent calls. In India, the customer verification or KYC norms, as laid down by DoT, are stringent and hence the veracity of database should be fairly reliable and better than crowd sourced databases. Further, it is available for 100% of the telephone subscribers. This gives some surety that the exercise of CNAP will give desired results in curbing UCC/fraudulent calls and will give confidence to telephone consumers to take calls from the numbers which are not in their contact list or which they do not otherwise recognise. Though TCCCPR provides a framework for curbing UCC calls but effective reporting and blocking mechanism of such calls by telecommunication network will go a long way in addressing the issue.**
- F. **In light of the above, we submit that there is a need to introduce CNAP supplementary services in the telecommunication networks.**

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

- A. We have seen that CLI is required to be seen by all the subscribers. In our view, like CLI, CNAP should be activated in respect of each subscriber so that any name

appearing can be seen. Such activation in respect of each telephone subscriber can curb the incidents of UCC/fraudulent incoming calls.

The telephone subscribers have a contact list on their devices. In case of incoming call from a contact list number, the description in the contact list will override any CNAP and CLI sent by the network to the device. However, with respect to calls from numbers which are not in the contact list in the device, the telephone subscribers will be better served and better safeguarded against any frauds if the CNAP is displayed with CLI at the time of receiving of the call.

Considering that the digital growth levels have far exceeded the corresponding digital literacy levels and the adoption of online payment by all the sections of the society, there is a need for mandatorily activation of CNAP service in respect of each telephone subscriber for better governance and for strengthening the digital eco system. The concerns due to online payment frauds like vishing/spam calls, specially where customers are new to the products or they may unknowingly divulge bank/credit details can be better addressed by such a mandate.

This, however, will be subject to addressing technical issues at device level and network level while expeditious addressable of spam call issue is a concern.

Therefore, only if required and if possible, to meet the underlying objectives of containing spam calls in an expeditious manner by faster implementation, we further suggest a focused implementation of CNAP for commercial entities/telemarketers. This may not in itself fully address the concerns, therefore, there should be additional backend checks and actions, like the steps taken to curb illegal exchanges based on number of calls and proportion of outgoing calls to different numbers, which should be notified and if a number meets this criteria then such number should be blocked until and unless it registers under the CNAP.

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.

Not applicable

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.

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

CNAP's effectiveness will depend on the veracity of the database of consumer names. In India, the customer verification or KYC norms, as laid down by DoT, are stringent and hence the veracity of database should be fairly reliable and better than crowd sourced databases. Further, it is available for 100% of the telephone subscribers. This gives some surety that the exercise of CNAP will give desired results in curbing UCC/fraudulent calls and will give confidence to telephone consumers to take calls from the numbers which are not in their contact list or which they do not otherwise recognise.

The CAF based name identity information is also readily available and is regularly updated as per the DoT instructions.

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.

A. For the reasons that database of customer name identity is maintained by respective telecommunication service provider, the call set up time is lower, to address any concern on digital personal data protection and to save cost and time in implementation of CNAP , Model No. 1 or a model evolved from this, i.e. 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, should be the preferred model. This is on the assumption that there should not be any major concerns in interconnection as regards to CNAP.

This will require TSP's database to remain updated and to be able to send name for each call to the terminating TSP during the process of call set up. This may necessitate call flow changes for accessing own database and sync-up with other TSPs, and setting-up or upgrading intermediary nodes for the passage of CNAP data. Like any other alternative, this may, therefore, require assessment of technical feasibility, call set up time change and costs to be considered by the Authority.

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?

A. As mentioned above, Model No. 1 or an evolution from that should be considered as preferred option in which there will likely be least increase in the call set up time. We submit that technical complexities and a workable solution

may require detailed examination by the Authority so that there is no quality of service concerns.

To address this issue, only if required and if possible, and to meet the underlying objectives of containing spam calls in an expeditious manner by faster implementation, we further suggest a focused implementation of CNAP for commercial entities/telemarketers. This may not in itself fully address the concerns, therefore, there should be additional backend checks and actions, like the steps taken to curb illegal exchanges based on number of calls and proportion of outgoing calls to different numbers, which should be notified and if a number meets these criteria then such number should be blocked until and unless it registers under the CNAP.

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.

- A. The existing telecom networks may not support CNAP functionality and development will be required for implementation. Changes in existing call flows and enablement of CNAP at node level will be required. Additional challenges may be there in case of circuit switches.

Further, mobile subscribers form around 98% of the telephone subscriber base and the UCC/fraudulent calls are experienced more by such subscribers. Hence, if wireline phones face additional challenges then Calling Name Presentation (CNAP) for Mobile Phones should be introduced first, may be in the focussed manner, as mentioned above.

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?

- A. In India, all handsets and landline phones may not support CNAP functionalities.

Additionally, we would like to refer to Technical Specifications issued by TDRA of UAE dated 26.5.2021 where the specification lists the technical requirements applicable to mobile devices and the main scope is to enable Calling Name Presentation in all mobile devices operation in the UAE mobile networks.

Under these specifications, all mobile phones are to implement and comply with the following behaviours:

- 1- Mobile handset shall be configured to receive and display the calling name from the network.
- 2- Mobile handset shall present the calling name and the calling number in the full screen mode.
- 3- Mobile handset shall display the calling name with or without the calling number in the banner.
- 4- Handset shall support the capability to reply and call back the received call with the name presented.
- 5- Mobile handset shall display the calling name and the calling number in the history of the call log.
- 6- Calling name presentation feature shall be enabled for GSM, UMTS, LTE, VoLTE and 5G and any new technology.

Further, following mobile devices specifications have been included:

ETSI TS 122 081	Digital cellular telecommunications system (Phase 2+) (GSM); Universal Mobile Telecommunications System (UMTS); Line Identification supplementary services; Stage 1
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ETSI TS 122 096	Digital cellular telecommunications system (Phase 2+) (GSM); Universal Mobile Telecommunications System (UMTS); Name identification supplementary services; Stage 1
ETSI TS 123 096	Digital cellular telecommunications system (Phase 2+) (GSM); Universal Mobile Telecommunications System (UMTS); Name identification supplementary services; Stage 2
ETSI TS 124 096	Digital cellular telecommunications system (Phase 2+) (GSM); Universal Mobile Telecommunications System (UMTS); Name Identification supplementary services; Stage 3
ETSI TS 124 080	Digital cellular telecommunications system (Phase 2+) (GSM); Universal Mobile Telecommunications System (UMTS); Mobile radio interface layer 3 supplementary services specification; Formats and coding
ETSI TS 124 196	Universal Mobile Telecommunications System (UMTS); LTE; 5G; Enhanced Calling Name (eCNAM)

ETSI TS 122 173	Digital cellular telecommunications system (Phase 2+); Universal Mobile Telecommunications System (UMTS); LTE; IP Multimedia Core Network Subsystem (IMS) Multimedia Telephony Service and supplementary services; Stage 1
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DoT will need to mandate required modifications to support CNAP functionality across OEMs, and with a cut-off date, which has to be before implementing and launching the CNAP.

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

A. This may be a consumer friendly measure and should be implemented. This will give consumers a better experience for National Toll Free Numbers in context of reliability of incoming calls from these numbers instead of any other number.

However, concerns, if any, with regard to risk of traffic by-pass or illegal routing be suitably examined.

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.

A. Yes, CNAP service should be activated for National Toll-Free numbers.

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.

A. Yes, CNAP service should be implemented for 140-level numbers allocated to registered telemarketers.

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?

A. 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. This is subject to a verified system of provision of 'preferred' name which should be linked to the resources given (numbers) and it should be considered as part of the Customer Agreement Form.

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.

A. The need and nature of amendment will determine whether it will be or is covered under TCCCPR or will require any amendment in the license.

Like provisions related to non-tampering of CLI, provisions related to non-tampering of CNAP will be required in the license.

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

A. Not at this stage.