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14th January 2023

To,

**Shri Akhilesh Kumar Trivedi,
Advisor (Networks, Spectrum and Licensing),
TRAI, New Delhi**

Sir,

**Subject:- Comments on Consultation Paper on Introduction of Calling Name
Presentation (CNAP) in Telecommunication Networks**

We are a registered CAG of TRAI covering the state of Karnataka.

We are pleased to attach our comments/suggestions on the above consultation paper.

Thanking you,
Yours Sincerely

GOPAL RATNAM V
Secretary
Consumer Care Society

Comments on
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?

YES. There is an urgent need to introduce the Calling Name Presentation (CNAP) in India. There are many reasons why this step is imperative as elaborated in the consultation paper. In our experience with customer grievances and complaints, subscribers receive a large number of unsolicited calls from personal numbers resulting in SPAM and CYBER-CRIME like Bullying, Identity theft, Phishing etc

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

YES. It should be mandatorily activated for each telecom subscriber.

The reasons are as follows;

- 1. All subscribers are troubled by SPAM and FAKE calls. While some of these calls lead to serious consequences of mental harm and economic loss, there is the inevitable loss of time in answering these calls and also the overloading of the network.**
- 2. Educating the millions of telecom subscribers to activate such a measure has in our experience been a never ending process and involves a huge amount of efforts by all concerned agencies.**
- 3. Eliminates the process of obtaining consent with the consequent economic costs.**
- 4. There is NO downside to mandatory activation for subscriber.**

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, as our response to Q2 is affirmative.

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

Our rationale is as follows;

- 1. A single point collection and diligent verification of data would eliminate all the errors of data acquisition and processing.**

2. The dispersed mode of collection and verification of data later in the process would lead to higher costs and higher probability of errors and frauds.

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.

MODEL NO. 3. We believe that this model provides the best possible operating conditions among the suggested options, despite its disadvantages like Coordination issues with multiple players, Additional investment and attendant higher costs of operations.

We also list the possible disadvantages with the other models.

Model No. 1. The disadvantages are that the originating TSP will have only a subset of the subscribers, that is their own customers and hence the very purpose of the policy change is defeated. Hence with many advantages of the model, we do not recommend it.

Model No. 2. The disadvantages of the model include the higher latency of call-step due to multiple data base referencing and search, Lack of Business Secrecy from sharing of subscribers database, Higher Data breaches, Possible handshake failures and incompatibility of databases.

Model No. 4. Duplication of efforts and infrastructure and consequent higher costs, Higher coordination efforts and friction.

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?

IMPLEMENTATION OF MODEL 1.

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.

NO COMMENT

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?

NO COMMENT

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

YES. This enable customers to identify the calling party and thus empower the customer by easily accessing the firms as their numbers are on the contact list. We have found that some firms make change their National Toll-Free numbers resulting in consumer inconvenience. Spoofing is also likely to be avoided.

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.

YES.

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

YES. As CNAP service will enable the customer/subscriber to decide on the acceptance of the call. Further, it would be easier to report any fraud or transgression by the 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.

NO COMMENT

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.

NO. The bulk subscribers and National Toll-free numbers should be identified by the name appearing in the CAF. This is necessary for the following reasons;

- 1. The customer has relationship with an entity - Firms (Bulk subscribers) or National Toll-Free numbers and hence that is what should be displayed in CNAP.**
- 2. There would be attrition of personnel with the entities and hence there would constant need to make changes in the database adding to delays and confusion.**
- 3. In case the customer wants to add a preferred name against the number of an entity, it can be done at his end.**

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

NOT APPLICABLE

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.

NO COMMENT

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

- 1. We suggest the inclusion of the location of the calling party to the details provided under CNAP will enhance the customer experience and also enable faster identification of frauds and scams.**
- 2. In our understanding there is no physical verification of the subscriber on the allotment and onboarding by TSPs. We suggest that physical/site verification of business entities ONLY be carried out so that there is reduced possibilities of Spams and Frauds. This will also enable faster tracing in the event of misuse.**

GOPAL RATNAM V
Secretary
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