Simple2Call
Simple2Save

Issues for Consultation:

1. **Whether there is a need to introduce the Calling Name Presentation (CNAP) supplementary service in the telecommunication networks in India?**
   - ➤ Yes. Telemarketers resort to use of non-140 numbers and lot of spam calls to the subscribers. So users have stopped attending the unknown CLI calls which in turn brings down telecom network answer call ratio (ASR). CNAP will help in genuine use case calls answer, ignore unwanted calls and improve network performance.

2. **Should the CNAP service be mandatorily activated in respect of each telephone subscriber?**
   - ➤ Yes. In countries like UAE, CNAP service are activated for business users only and not for consumers. However entities can abuse such regime by procuring services under the name of consumers and use such connection for out-calling without CNAP, which will defeat the purpose.

3. **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.**
   - ➤ Telecom operator should acquire consent and predefined display name format of CNAP undertaking from customer signed either digitally or physically as part of activation process. The standardised CNAP undertaking for a given number be provided by an authorised signatory as is used in CAF or approved by Board of Directors. There should be provisions to make sure an end customer does not harass 3rd party by using its name as display.

4. **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.**
   - ➤ No.
   - ➤ Called subscribers would identify a company by a brand and not by a legal entity name. Name in CAF is usually a legal entity name and that would not be meaningful to present as CNAP. The business brand name is desired to be presented as CNAM. Hence having CAF name as CNAM will not serve the purpose.
   - ➤ There should be possibility to present CNAM for individual number. CAF may be used for purchasing say, 30 numbers and 10 numbers are used for calling for purpose A and 20 numbers are used for calling for purpose B.

5. **Which among the following models should be used for implementation of CNAP in telecommunication networks in India?**
   - ➤ Model No. 4, in which a centralized CNAP database is established & 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. Possibly government can explore owning such service and may/ may not choose to outsource to a 3rd party.
   - ➤ Having centralised CNAP database will allow to identify bulk connections procured under same KYC data across multiple operators. It will be desirable from national security point of view to eliminate bulk connections procured with malicious intention and knowingly exploiting certain loopholes in across operator reconciliation. It will be easy to enforce certain CNAP business rules in common database.

- Such 3rd party must comply to user privacy guidelines from DoT & TRAI & IT security standards (such as ISO27001, ISO27701) as it will have sensitive user information.
- CNAP Cost of operations needs to be kept in mind so that operators are able to execute in current challenging financial scenario.

6. **What measures should be taken to ensure delivery of CNAP to the called party without a considerable increase in the call set up time?**
    - The CNAP should be updated timely manner with predefined SLA.
    - TSP should synchronise its local CNAM database with centralised 3rd party database on daily basis. TSP should use local database for CNAP processing while terminating the call in its network. Thus updated CNAM will get into its local database on 24 hours lag basis.
    - TSPs should use timeout mechanism i.e. If they are unable to fetch the CNAP due to any technical issues/ outage, it should progress the call without CNAM.

7. **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.**
    - As per our information caller party name is displayed basis 'Caller ID' capability of the telecom network protocol. Current networks across India may have challenges due to different vendors, make of system, their technology evolution and life cycle support for system changes.

8. **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?**
    - Majority devices are supported. Some feature phones and landline phones without display may not support. The technical specification should be finalised in line with global standards and be made mandatory for all phone manufacturers selling phones in India.

9. **Whether outgoing calls should be permitted from National Toll-Free numbers? Please elaborate your response**
    - Yes, the Calls from the National Toll Free be permitted. USA and Canada permit 1800 numbers to be used as CLI for outbound calls. The operators which provide 1800 service should be allowed to allow outbound calls using same 1800 number.
    - Many service organisation use Toll free for in-bound calls and the same is publicised in marketing collaterals. However a different non-toll free number is used as CLI for outbound calls to customers. The called user is unable to relate the identity for such calls. In such cases calls from the National Toll-Free numbers can help.
    - Toll Free number & its usage is more expensive than traditional local landline/ mobile number & their usage calls. Hence chances for using toll free numbers for spam, fraud calls will be lower.

10. **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. CNAP feature and its business name description should be part of Toll free number service activation request.

11. **Whether CNAP service should be implemented for 140-level numbers allocated to registered telemarketers?**
    ➢ Yes. Adding CNAP will increase 140 number utility and increase the network performance.

12. **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.**
    ➢ There should be process for telemarketers to acquire written consent with CNAP display from Principal party and the same should be provided to the telecom operator. There should be provisions to make sure an end customer does not harass 3rd party by using its name as display.

13. **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.
    ➢ Bulk subscribers procure multiple numbers for their different clients and different services. Preferred display name can be different for different customers.
    ➢ CAF will have bulk buyer legal entity name and presenting the same as CNAP for all the bulk numbers will defeat the CNAP purpose. Called subscribers would identify a company by a brand and not by a legal entity name. Name in CAF is usually a legal entity name and that would not be meaningful to present as CNAP. The business brand name is desired to be presented as CNAM.

14. **In case the response to the Q13 is in the affirmative, what rules should govern the implementation of such a facility?**
    ➢ Every business customer should provide a standardised CNAP undertaking for a given number from authorised signatory as is used in CAF or approved by Board of Directors.
    ➢ DoT has applied CAF ad KYC framework for VNOs. Hence VNOs buying bulk umbers from NSOs should have the ability to apply CNAM to individual number. VNOs can procure such service from 3rd party who will operate CNAP database and enter its customer related CNAP along with CNAP undertaking. There should be provisions to make sure an end customer does not harass 3rd party by using its name as display.

15. **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.**
    ➢ Yes. This will force users to provide CNAP information during activation and provide CNAP for existing working numbers. It will make sure all the stake holders including telecom operators (both NSOs, VNOs) operate the entire ecosystem in designed manner.
    ➢ This will allow to levy penalty or any other form of disincentive on users who provide misleading CNAP data with fraudulent intentions.

16. **Whether there are any other issues/ suggestions relevant to the subject? If yes, the same may be furnished with proper justification.**
    ➢ For numbers procured by VNO, VNO must have facility to update CNAP description for each number either directly into 3rd party database or via its NSO. NSO should be mandated to extend such CNAP service update facility to VNOs. No business customers will find it useful to procure services from VNOs if VNOs can not extend

CNAP service. If only NSOs (underlying operators) have ability to supply CNAP services, then VNOs will not have any viable business model. This will reduce market innovation, competition driven by VNOs introduction defeating the purpose for which VNOs were introduced by the Government of India.