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Telecom Regulatory Authority of India

Sub: Submission in response to TRAI's consultation paper on Introduction of Calling Name Presentation (CNAP)

Submission through email

January 17, 2023

Dear Sir,

Truecaller welcomes the initiative by TRAI to protect citizens from spam and scam. As mentioned by TRAI, India is the second-largest telecommunications market in the world with 1145.5 million wireless subscribers and 26.5 million wireless subscribers. However, spam calls and phone and SMS based scams continue to be an issue of concern for the citizens of India. This is a real threat for first-time smartphone users, as well as citizens located in smaller towns and rural areas, who may lack the digital literacy skills to navigate such spam and scam calls. Truecaller's mission is focused on protecting people from such harm and helping build trust in communication and ensuring the safety of overall phone-based interactions. Truecaller appreciates TRAI for highlighting this issue and opening this public consultation to increase awareness and explore multiple solutions to better protect citizens from spam and scam calls. TRAI has taken several initiatives in this regard over the past decade and we hope that the CNAP proposal can converge with Truecaller's work in protecting citizens from phone-based harm. We understand that it is a complex issue, which is constantly evolving, and hence takes a considerable amount of time, effort and expertise to solve. In our efforts, we have ensured that the information available to the user on our app goes beyond the identity of the user. It combines community feedback along with our sophisticated machine learning and proprietary artificial intelligence algorithm to mark numbers as spam. Additionally, spam reports, call activity and the reason for calling, are other community-sourced factors that help establish the caller's identity. An implementation of a CNAP system could be used as additional information that can help Truecaller users have more control over their communication.

Truecaller features to protect users from harm

Our product has evolved over the last decade since we began operating in India in 2013 from being a simple caller identification service to adding a host of value-add features and services.

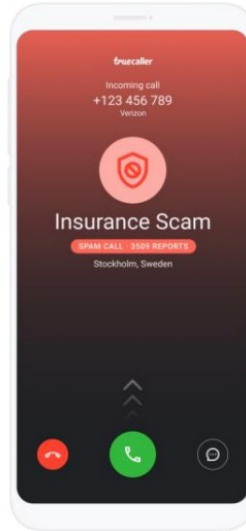
These go much beyond caller identification in keeping our users safe and building trust in communication.

There is immense value in crowdsourced information to solve the fraud and scam challenge. For capturing the name identity of a calling subscriber, TRAI is suggesting that the Telecom Service providers obtain the name identification of each subscriber through the Customer Acquisition Forms. However, in India, there are multiple news reports of fake SIM cards being procured and activated without proper identification. Moreover, any individual can obtain up to 9 SIM cards by providing their proof of identity and proof of address. In such cases, the identity of the actual user of a mobile number may not be the same as that of the subscriber. Here, Truecaller provides a robust crowdsourced database that is reliable and regularly updated and helps in solving the problem by disseminating the caller ID of the actual user of a mobile number.

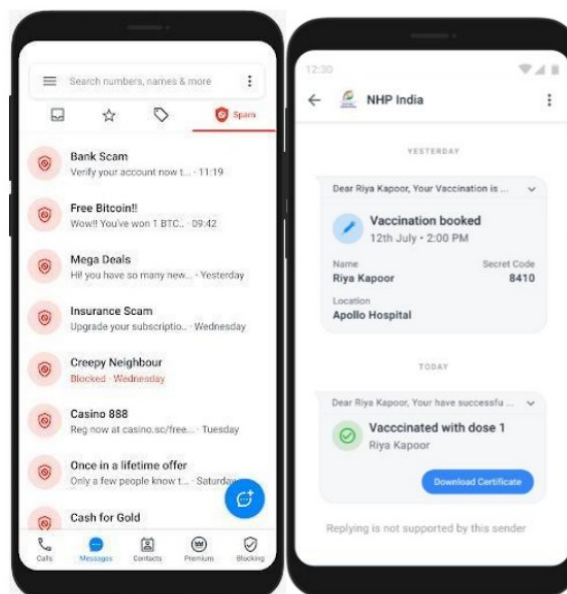
With 240 million users in India, Truecaller corroborates information from multiple signals including a community of active users who routinely vet and update information in real time, adding tremendous value to our spam identification system. Based on community feedback and a combination of AI/ML tools, Truecaller goes beyond just providing name information and empowers users to stay protected by flagging spam/scam calls. Truecaller's service provides additional context to the user to make an informed decision when responding to a phone call and we are confident that users will continue to recognize the value addition provided by Truecaller.

Some of the distinctive features of the Truecaller application include:

- a) Spam blocking: Along with identifying the caller, Truecaller also informs users whether a specific number has been identified as a spam number, based on feedback from our community of users. In addition to the actual information, we employ intuitive visual cues, such as blue for a normal number, red for spam, purple for a priority call, and green for a verified business etc., to communicate more context to our users in a readily consumable form. Truecaller allows users to either add these numbers to a block list, or enable autoblock for blocking numbers identified as spam.

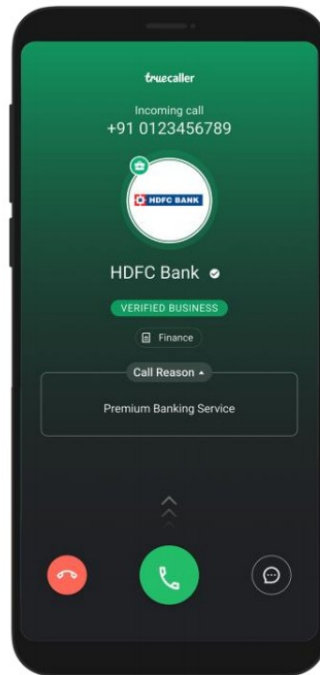


- b) Smart SMS: The smart SMS feature automatically identifies incoming messages, blocks and identifies spam and suspicious messages, and sorts all other messages into intuitive categories, making it easy for the user to navigate. All filtering and sorting is done locally on the user's device. With the current rise in spam, phishing and frauds taking place through SMS, this feature is very helpful in keeping users safe by trying to keep them out of the main inbox reducing the chances of first-time digital users reading these messages or clicking suspicious links unintentionally.

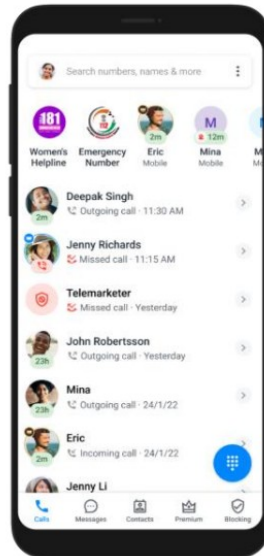


- c) Highlighting verified businesses: As part of our enterprise solutions for businesses, Truecaller has distinct visual differentiators for businesses that are verified. These include the green verified business badge, brand logo, and brand name. For the business, this

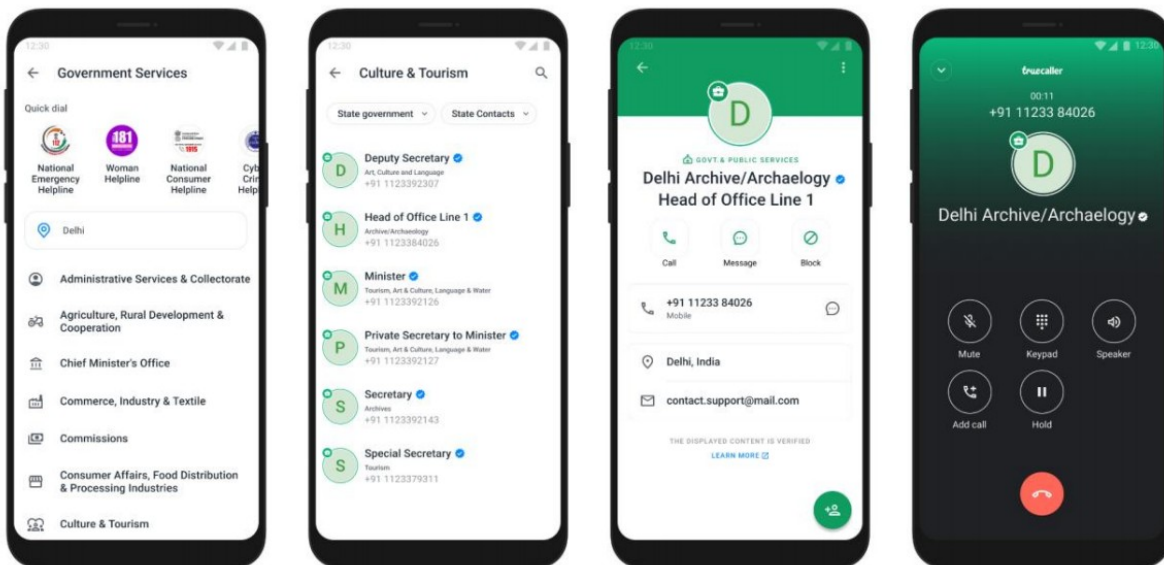
builds trust in their interaction with the consumer and protects their brand from being misused by scammers. For the consumers, this gives them more insight for making decisions related to the calls they receive, while also protecting them from any kind of fraud attempted in the name of the business.



- d) Pinning emergency numbers on the [Dialer](#): To allow users to easily access emergency numbers and contact the authorities, Truecaller has pinned the national emergency number 112 and the women's helpline number 181 to the dialler allowing for one-click access to these numbers in the case of an emergency. We partnered with the Delhi Commission for Women to integrate the 181 Women's Helpline number that saw a 100% rise in the number of calls being made to the helpline within a short period of time.



- e) Government Directory Services: Truecaller has launched an in-app digital Government Directory Services to support seamless interaction between citizens of India and the Government by giving easy access to thousands of verified contacts of government officials. Truecaller is making continuous improvements to make its product more useful and relevant for users and address important issues around the impersonation of government officials. The directory is one such effort which allows users to seamlessly access verified contact information of government departments while also protecting them from potential harm due to impersonation of government officials.



Truecaller Safety Initiatives

Truecaller is on a mission to build trust in digital communication, and online safety is at the core of our work at Truecaller. To help users navigate the digital world safely, Truecaller has been using its expertise and resources to build capacity and create awareness on different aspects of online safety. Two campaigns Truecaller has recently undertaken in this regard are:

- a) The [TrueCyberSafe campaign](#), in partnership with the CyberPeace Foundation: As a part of this campaign, cyber safety trainings were conducted across India for 1.6 million individuals and a cyber safety curriculum handout has been made available for citizens. The initiative is aimed at building the capacity of citizens to stay protected from online abuse, fraud, spam, and scams. Since February 2022, the [#TrueCyberSafe](#) sessions have been held in different regions across the country with the support of premier educational institutions and key government officials, sessions have been held in Delhi, Karnataka, Jharkhand, Rajasthan, Tamil Nadu, and the North-East. Truecaller has also partnered and highlighted the efforts of local law enforcement agencies in the regions where the various training have been conducted.
- b) [#ItsNotOk campaign](#) to create awareness against harassment of women: Truecaller, in partnership with Network 18, undertook a massive pan-India campaign [#ItsNotOk](#), with a focus on highlighting the prevalence of harassment against women and creating awareness about the need for women to take action and call out harassment, and sharing information and resources on how to reach out to authorities. The campaign used innovative ways to focus on interaction and engagement on the issue through - town hall format events, [streamathons](#), [IG lives](#), [twitter spaces](#), tweetathons, [short-format videos](#) and special shows on television. Throughout the campaign, different stakeholders comprising lawyers, activists, politicians, law enforcement agencies, celebrities, journalists, mental health experts and survivors of harassment came together to discuss different perspectives on the issue and brought awareness about existing resources and complaint mechanisms to support women. Truecaller received support and encouragement from different stakeholders in government, such as the [Union Minister of Women and Child Development](#), [Union Minister of Labour and Employment](#), [Environment, Forest and Climate Change](#) and the [Minister of State for Skill Development and Entrepreneurship and Electronics and Information Technology](#), amongst others. Overall, the campaign has reached around 1.8 billion digital accounts. Truecaller has also created a short cyber safety training [curriculum](#) which women can access and use to increase their awareness on harassment and how to protect themselves from it.

- c) Culmination of #ItsNotOk in partnership with Delhi Police: The six-month-long initiative culminated with the unveiling of the #CallItOut Wall and a Run to EmpowHER in partnership with the [Delhi Police](#) with the promise of a safer future for women in the digital and physical world. Our partnership with the Delhi Police and the response and participation from citizens is a testament to the campaign's collective efforts in creating a conducive environment for women to report harassment.
- d) CyberWise with Assam Police: Recently, Truecaller has partnered with the Assam Police to conduct a cyber safety training and certification programme called [CyberWise](#) for college students across all districts of Assam. Truecaller is engaging with other state governments to conduct similar trainings in different states.
- e) Partner with Telangana Police to set up Centre of Excellence for Cyber Safety: Initiative partners with the [Telangana Police](#) in its efforts to set up the Centre of Excellence for Cyber Safety to secure the cyber ecosystem of the state.
- f) COVID-19 collaborations with government authorities: During the COVID-19 pandemic, Truecaller's quick dial feature helped 80,000 people contact the government's dedicated COVID-19 helpline number for information regarding hospitals and vaccination centres. This was done in partnership with the Ministry of Health and Family Welfare. Additionally, in partnership with the Cybercrime Department and the Ministry of Home Affairs, numbers that had FIRs registered against them were marked as 'scam' on Truecaller to protect people from COVID-related fraud. As part of Truecaller's efforts to make communication safer and more efficient, we also launched a COVID healthcare directory, to allow users to connect with verified numbers of hospitals. For this initiative, Truecaller has received [recommendation](#) and support from law enforcement officials.
- g) Voluntary user verification: In an effort to improve trust on the Truecaller platform, we are in the process of rolling out an option of voluntary user verification, through a digital e-KYC process, which would allow users to verify their identities on their platform. Additionally, as has already been [indicated](#), Truecaller will insist on KYC-based verification for users on the app, if the same is required by regulation.

Truecaller has created a safety [primer](#) which briefly captures the safety-focused public interest initiatives that Truecaller undertakes to ensure that users are equipped with the skills and knowledge to safely navigate digital spaces.

We believe that while this is a promising step to solve the spam problem, a lot more innovation is required beyond just identifying calls. Another area that is missing in the paper are measures to deal with spoofing and robocalls. The Truecaller Caller ID provides a smart solution for

consumers to stay protected from spammers and fake calls. Users are provided with the identity of the caller and also receive information on whether the call is spam or a fake call. Under the premium features of the app, a user can also choose to auto-block spoof calls.

Further, there are market innovations that are helping in solving this challenge that supports consumer choice. A non-mandated approach is working well and can be further encouraged by creating a supportive ecosystem. In addition to the on-ground digital literacy work, we have been driving awareness through communication on our platform in the form of push notifications (please refer below) on the various types of spam and frauds since we believe that spam literacy can contribute significantly in reducing this menace in society.



In terms of the way forward, we feel that it is important to do an assessment of different aspects of this issue by undertaking a study to evaluate potential consequences on consumers and the industry before deciding on next steps. It is critical that implementation of new mechanisms should not result in unintended adverse consequences for the consumers in terms of increased cost of service, as well as issues of quality for e.g. due to increased call latency. Additionally, it may be helpful to consider an evaluation of existing technology and regulatory solutions in terms of their effectiveness, gaps in implementation, and whether the current proposal addresses the same. Any form of CNAP implementation may require significant investments both in terms of technology and infrastructure, and hence the need to undertake a detailed study becomes all the more crucial.

Finally, we would like to reiterate that we are excited to read about the proposal and laud the government's intention to protect citizens from spam, scams and fraud, which is closely aligned with Truecaller's core mission. We are fully committed to working together in our shared mission of making phone-based communications safer and we look forward to discussing this further to see how we can best contribute to this mission. We are keen and remain available to engage positively with the Government of India, and are willing to offer support and expertise, as needed.

Yours sincerely,

A handwritten signature in black ink, appearing to be "Alan Mamedi".

Alan Mamedi
CEO, Truecaller