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*Analysing developments impacting business*

### REDEFINING CALLING NAME PRESENTATION: ENHANCING COMMUNICATION OR COMPROMISING PRIVACY?

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On 23 February 2024, the Telecom Regulatory Authority of India (TRAI) issued recommendations on 'Introduction of Calling Name Presentation (CNAP) Service in Indian Telecommunication Network' (CNAP Recommendations) pursuant to stakeholder comments received in response to its consultation paper on this matter. By way of a background, the Department of Telecommunications (DoT) has been deliberating the introduction of CNAP service to provide users / called parties the ability to view the name of the calling party at call set up time while receiving incoming calls. Accordingly, DoT made a reference to TRAI to examine the feasibility of introducing CNAP as a supplementary service and issue its recommendations on this.

For context, in the present Indian telecom network, at the time of receiving an incoming call, the mobile/ landline numbers are displayed as Calling Line Identification (CLI). There is no mandate for presenting the name of the party making the call to the called party. The DoT noted that it was important to introduce this feature in order to enable the subscribers to view the name of the calling party. This would help subscribers make an informed decision while receiving an incoming call and identifying spam /calls from unknown sources.

#### **Key features of the CNAP Recommendations**

- *Introduction of CNAP supplementary service:* TRAI recommended the introduction of CNAP supplementary service in the Indian telecommunication network, emphasizing that all access service providers must offer CNAP service to their telecom subscribers upon their request. Specifically, the name provided by telephone subscribers in the Customer Application Form (CAF) was suggested to be utilized for the purpose of CNAP. In essence, CNAP service seeks to streamline the caller identification process while maintaining consistency with the information provided by the subscriber.
- *Technical model for implementation of CNAP:* TRAI took cognizance of the fact that a large part of the Indian telecom network is still based on circuit-switched (CS) core which may not be able to implement the CNAP service. In light of this, TRAI recommended changes in the technical model for implementation of the CNAP service. These changes include establishing and operating a database consisting of subscriber's name against their telephone numbers, querying the Local Number Portability Database (LNPD) to identify the originating access service provider of the telephone call, etc. Accordingly, if the CNAP service is adopted by the DoT in the manner recommended by TRAI, telecom service providers (TSPs) will have to undertake the necessary technical modifications in the network to enable smooth integration of the CNAP service.
- *Trial and assessment for implementing CNAP:* In order to effectively introduce this service on pan-India basis in the Indian telecom network, TRAI has suggested

conducting a trial and assessment of the service in one licensed service area (LSA) covering the subscriber base of each TSP within the LSA. This helps in ensuring a detailed understanding of the feasibility and potential challenges of implementing this service. Accordingly, necessary adjustments can be carried out to facilitate a successful rollout of the CNAP service across the entire country.

- *CNAP for commercial communications:* TRAI has also identified recommendations for the implementation of CNAP service in case of commercial communications. Particularly, TRAI recommended that in case of calls originating from 140-level numbers allocated to registered telemarketers and any other number series allocated for making transactional or service-related calls, the name of the subscriber entity should be presented to the called party. In order to do so, TRAI recommended that subscriber entities holding bulk and business connections should be given the option of presenting their 'preferred name' instead of the name appearing in the CAF. Such 'preferred name' could be the registered trademark name, trade name or any other unique name registered with the government, which can be corroborated by presenting the required documents. In this regard, TRAI has also sought that the DoT should formulate guidelines for documents to be provided by subscriber entities and to prevent any misuse of this facility.
- *Privacy considerations:* Introduction of the CNAP service could potentially open doors for concerns relating to privacy and data protection. For instance, CNAP service entails disclosure of personal information of a subscriber to the recipient, resulting in invasion of privacy particularly for callers who prefer to keep their identity private for security reasons or maintaining anonymity. Additionally, storage and transmission of caller information also exposes threat to potential vulnerabilities such as data breaches and unauthorised access which should be addressed through robust data protection measures. To address such privacy concerns and to enable control over an individual's autonomy to manage their personal data, TRAI has suggested that the calling name of telecom subscribers who have availed the calling line identification restriction (CLIR) facility should not be presented to the called party.

### Comment

TRAI has adopted a balanced approach *vis-à-vis* the CNAP service, redefining CLI in the telecom industry while also taking into account privacy considerations. The CNAP service is also likely to aid TRAI's continuous efforts in curbing spam, malicious and fraudulent calls from unknown sources which has created a menace in the recent times. Notably, while various existing players are already offering spam and calling party name identification features through mobile applications, given that these applications rely on crowd-sourced data, the regulators in India sought a more trustworthy and reliable service to address this issue.

While these recommendations certainly aim to improve calling experience for telecom subscribers, it is pertinent to navigate these changes recognizing the importance of both safeguarding privacy and fostering innovation. While adjustments may be required, this evolution presents an opportunity for the industry to adapt and thrive in a more secure environment. It will be interesting to see whether the implementation of CNAP heralds a positive step towards a telecommunications landscape that balances user privacy with technological advancement.

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