

Government of India
Ministry of Communications
Department of Telecommunications
(Licensing Policy Wing)

12th Floor, Sanchar Bhawan, 20 Ashoka Road, New Delhi – 110 001

File No: 800-18/2025-LPU

Dated: 21.11.2025

To

All UAS/ UL (having Access Service Authorization) Licensees

Subject: Instructions for handling anticipated KYC issues during implementation of Calling Name Presentation (CNAP) service in India-reg

This is in reference to DoT letter no. 20-1349/2024 AS-I dated 27.10.2025 regarding trial of CNAP service in the Indian Telecommunication Network. Further, representations have been received from licensees on anticipated KYC issues during implementation of CNAP service in India .

2. Subsequent to examination of the representation by licensees, the undersigned has been directed to convey the approval of competent authority that following instructions shall be followed to address anticipated KYC issues during implementation of CNAP:

i. **Calling Line Identification Restriction (CLIR):** For subscribers who have the CLIR facility activated as per DoT guidelines, their Calling Name (CNAM) information to called subscriber shall **not** be displayed during trial or after commercial rollout of the CNAP service, as & when decided by DoT.

ii. **Bulk or Business connections:**

a. The entities/companies/organizations holding bulk or business connections may be permitted to display their “preferred name” in place of the name recorded in the Customer Application Form (CAF). The preferred name may correspond to the registered trademark name as per the records of the Ministry of Corporate Affairs, the trade name as registered with the GST Council, or any other officially recognized name duly registered with a Government authority, subject to the submission of a valid document establishing ownership of such name.

b. For new connections, the preferred name of the entity/company/organization shall be recorded in both the CAF and the Subscriber Data Record (SDR) and corresponding documents establishing ownership of such name, be appended with CAF.

c. For existing connections, the Licensee shall establish an appropriate mechanism to enable such entities/ companies/ organizations to submit the requisite supporting documents, upon which the preferred name

may be duly verified and updated in the SDR.

- d. While assigning a preferred name to an entity/ company/ organization for CNAP services, the Licensee shall undertake due diligence and collect the necessary document establishing ownership of such preferred name. If a preferred name is assigned without proper verification, the Licensee will be held responsible for any misuse of this facility. During bulk or business user premise inspections, as envisaged under the licensing conditions, the Licensee shall, in addition to verifying the bona fide use of telecommunication services, also ensure that the preferred name belongs to the respective entity at the time of inspection.

iii. **Priority of Display:** The CNAP display on the called subscriber phone shall consist of two fields. The first field will show the calling party number as per the existing practice, and the second field will display the calling party name based on the following sequence of priority:

- a. first, the name as per the contact list stored on the called subscriber's phone, if the calling number is saved on called subscriber's phone;
- b. and second, if the calling number is not saved on the called subscriber's phone:
 - i. For Domestic call: the CNAM or preferred name as provided in the CAF/SDR of the subscriber shall be displayed
 - ii. For International call: the text "International Call" shall be displayed

3. Additionally, the licensee shall establish a mechanism (e.g. a dedicated helpline number, mobile application or web portal etc.), to record and maintain the count and details of complaints, relating to incorrect name presentation to called subscriber on implementation of CNAP service on trial basis, as per attached format as Annexure-I. The compiled information shall be reported to the LP Division on a weekly basis, every Monday, for the next 2 weeks. Based on these reports, DoT may issue further instructions to address any remaining CNAP-KYC related issues to be reported by the licensees.

Digitally signed by
NISHA (Nisha)
Date: 21-11-2025 16:34:15 **ADG (LPU)**

Copy to:

- i. Secretary (TRAI)
- ii. DG(T), DoT HQ
- iii. DDG (AS)/DDG (AI & DIU)/ Director (LPA), DoT HQ

Annexure-I

CNAP related KYC issues		No. of Complaints	Gist of complaints	Remarks, if any
Ownership Transfer	Blood relative/Legal heir			
	Others			
Incorrect name in CAF or name change as per legal process	Data entry error			
	Name change as per legal process			
Subscribers having long name				
Any others	Topic			