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To,
Advisor (Broadband and Policy Analysis),
Telecom Regulatory Authority of India,

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No. BSNLCO-RGLN/25/2/2024-REGLN / dated 26-07-2024

Sub: Comments on Consultation Paper on Revision of National Numbering Plan dated 6th June, 2024.

Please find below para-wise comments of BSNL on Consultation Paper on Revision of National Numbering Plan dated 6th June, 2024,

Q1 Are there any TI resource shortages envisaged in the near future due to the presently adopted SDCA based fixed line Telecom Identifier scheme? Is there a need to revise the criterion prescribed by DoT for allocation of additional Telecommunication Identifier (TI) resources for fixed line access services? Please provide answers with detailed justification.

BSNL Reply: No shortage is envisaged in near future. Rest is the policy matter, however, it is felt that there is no need to revise the criterion.

Q2 How can the (a) Spare SDCA codes and (b) Unused sub-levels out of the levels allocated to TSPs be best utilized to cater for future requirements of TIs for fixed-line access services? Please provide a detailed answer.

BSNL Reply: Copper based landline connections are decreasing but FTTH connections are increasing/ being provided. So these sub-levels will be required in future.

Q3 As is the case currently with mobile numbers, in order to ensure availability of TIs for fixed lines, should 10-digit closed numbering scheme be made applicable to fixed line also? Please provide answers with detailed justification.

BSNL Reply: No comments

Q4 Will migrating to LDCA based TI scheme address the constraints in SDCA based fixed line TIs? Please provide answers with detailed justification.

BSNL Reply: No comments

Q5 What are the other possible options, if any, to address the currently envisaged constraints in TI resources for fixed lines in an efficient manner? Please provide your answers with a detailed proposition (including technical challenges, changes required in handling, routing, interconnection and termination of emergency services and other essential calls and associated cost benefit analysis). Supportive documents, if any, may

also be provided to justify your answer.

BSNL Reply: No comments in view of response to Q1.

Q6 Is bulk allocation of TI by few TSPs for providing SIP and PRI based services likely to create TI resources shortage in near future? If yes, what are the suggested means to address this issue? Please, provide your answer with supportive data.

BSNL Reply: No comments

Q7 Is there a need to introduce appropriate definition for 'inactive connection' for fixed-line services and the exact time duration after which, TIs associated with these inactive connections can be put to reuse? Is there also a need to revisit the definition of 'inactive connection' for Mobile services? Please provide your answers with detailed justification and suggested definition.

BSNL Reply: No comments

Q8 (a) Whether charges should be introduced for existing and newly allocated TI resources to ensure their efficient utilization? If yes, what should be the charging mechanism and applicable charges? Please provide detailed justification along with supportive documents, if any. (b) Should a financial disincentive be imposed upon TSPs for retaining X% or more of the allocated TIs remaining as unutilized beyond a certain timeframe? If yes, please specify the X% with suggested disincentive mechanism and retention timeframe with detailed justification?.

BSNL Reply: No comments

Q9 What is the minimum contiguous range of unutilized TIs which the TSPs should be allowed to surrender for mobile and fixed-line services.

BSNL Reply: No comments

Q10 Are there any constraints envisaged in TI resources and its allocation for Machine-to-Machine (M2M) services? If yes, what changes should be incorporated to cater for its future requirements? Do support your answer with detailed justification.

BSNL Reply: With five codes 559, 575, 576, 579 and 597 as M2M identifiers, theoretically 50 billion numbers can be generated. In context of five stipulated M2M identifiers indicates that the prospect of facing any impending constraints regarding allocation of M2M codes looks improbable. Hence, there is no constraint in TI resources for M2M services

Q11 What constraints/issues if any, are currently envisaged in the procedure being followed for allocation of Level-1 short codes by DoT? Should the level-1 short codes be reserved for government entities only? Will allocation of level-1 short codes on chargeable basis solve the issues identified in aforementioned question? What are the other possible suggestions for judicious allocation and effective utilization of level '1' numbering resources? Please support your answer with detailed justification.

BSNL Reply: Level-1 short codes are finite, and their judicious allocation is essential to meet demand. DoT aims to ensure efficient utilization of these codes. Operators must

use them effectively to avoid wastage.
1. Chargeable Allocation:
> o Allocating Level-1 short codes on a chargeable basis could address some issues:
>> Incentive for Efficient Use: Operators would be motivated to maximize their usage.
>> Revenue Generation: Charging for premium codes could generate revenue for infrastructure development.
>> Balancing Demand: Pricing can help balance demand and availability.
2. Other Suggestions for Effective Utilization:
> o Service Differentiation: Assign codes based on service types (e.g., '10XX' for operator-assisted calls, '13XX' for service indicators) to avoid redundancy.
> o Promote Longer Numbers: Encourage operators to use longer PSTN numbers or '1800' numbers for certain services when Level-1 codes are exhausted2.
> o Regular Audits: Periodic audits ensure compliance and efficient allocation.

Q12 What are the global best practices being followed for judicious allocation and effective utilization of short codes (akin to Level-1 short codes in India)?

BSNL Reply: Global best practices for short code allocation and utilization vary across countries and regions.
However, here are some key considerations:
1. Structured National Numbering Plans:
> o Each country should organize its numbering plan to meet current and future demand.
> o Short codes (or USSD codes) fall within this numbering plan.
2. Common Short Codes:
> o Recommend common short codes for critical services (e.g., credit balance check, customer care) to enhance consumer experience.
> o These codes should be easy to remember and widely used.
3. Harmonization and Categorization:
> o Propose a harmonized model for short codes, considering different services and their impact on businesses.
> o Categorize short codes based on purpose (e.g., information, assistance, M2M) to streamline allocation.
4. Efficient Usage:
> o Encourage efficient utilization of short codes to avoid wastage.
> o Operators should maximize usage within allocated ranges.
5. Collaboration and Sharing:
> o Operators can share codes for similar services to optimize resources.
> o Collaboration ensures fair distribution and prevents hoarding.
> 6. Regular Audits and Reviews:
> o Periodic audits assess compliance and efficiency.
> o Recover underutilized codes for reallocation.

Q13 Are there any constraints/challenges envisaged with regards allocation and utilization of TI resources for Service Control Point (SCP) codes and Signaling Point (SP) codes respectively? If yes, what changes should be incorporated to cater to future requirements of the aforesaid codes? Do support your answer with detailed justification.

BSNL Reply: No comments

Q14 What constraints/ challenges are anticipated with regards TI resources for Location Routing Number (LRN) codes to cater for futuristic requirements? What changes, if any, should be incorporated to effectively address its future needs? Do support your answer with detailed justification.

BSNL Reply: As can be seen from the data provided by DoT that has been presented, only 215 LRN codes have been shown available for allocation. One LRN code is allocated to an access service TSP for each Licensed Service Area (LSA). This means that the current spare LRN codes can cater to roughly 10 more TSPs assuming that such TSPs will take licenses for all 22 LSAs. Hence, there seems to be no constraint in TI resources for LRN codes.

Q15 What constraints/ challenges are anticipated in the allocation of TI resources for Intelligent Network (IN) Services like Free Phone service, Premium services, International Toll-Free Service (ITFS), etc.? What changes, if any, should be incorporated to cater for its future requirements? Do support your answer with detailed justification.

BSNL Reply: No comments

Q16 What constraints are envisaged towards TI resources for MCCMNC codes being used for Captive Non-Public Networks (CNPNs)? What changes, if any, should be incorporated to cater for its future requirements? Do support your answer with detailed justification.

BSNL Reply: The 15-digit numbering scheme that is being used for MCC-MNC Code for CNPN is as given below:
"999 (3-digit fixed for CNPN) + XXX XXX (6 digit for Service providers) + XXX XXX (6 digit / 1 million users/services)". Since six digits have been kept for identifying a CNPN, there does not appear to be any constraint as far as telecom identifiers for MCC-MNC for CNPN is concerned.

Q17 Apart from the questions posed above, are there any additional issues being experienced by the TSPs regarding the aspects of the National Numbering Plan 2003 and TI resources allocation criteria? If yes, then the same may please be brought out in detailed elaboration with supporting documents.

BSNL Reply: Nil

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