



RSM/COAI/2019/199

November 13, 2019

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**Subject: COAI Submission to the TRAI Consultation Paper on “Developing a unified numbering plan for fixed line and mobile services”**

Dear Sir

This is with reference to the Consultation Paper “Developing a Unified Numbering Plan for Fixed line and Mobile Services” issued by TRAI on September 20, 2019.

In this regard, please find enclosed COAI submission on the Consultation Paper as Annexure-1.

We hope that our submission will merit your kind consideration.

Regards

**Rajan S. Mathews**  
**Director General**

Cc: Shri U. K. Srivastava, Pr. Advisor (NSL), TRAI



**Response to Consultation Paper on Developing a Unified Numbering Plan for Fixed line and Mobile services**

Q1. Whether, the unified numbering scheme should be introduced in India? If yes, please provide the possible ways of implementing it with justification.

**COAI Response**

Our member TSPs support the following:

- a. Introduction and implementation of Unified numbering scheme is complex. This was also noted by the DoT and by the Authority in 2012 where the Authority had mentioned that separate consultation would be undertaken on this matter, in detail.
- b. Unified Numbering Plan will require changes in the architecture and data bases of the fixed network, re-arrangement of POIs, and changes in routing and billing systems (including inter-operator system, OSS etc).
- c. We highlight that the consultation paper does not indicate the details of the numbering capacity that will be made available in case unified numbering scheme is adopted. Moreover, there are no details in the paper w.r.t the efforts/changes that will be involved in various network elements, IT systems, interconnection architecture and routing levels. Therefore, we propose that all these larger aspects to be factored/weighed against the objective of whether there is a need to consider Unified numbering, should be discussed with the TSPs, in a separate detailed Consultation Paper.
- d. In view of the same, migration to Unified Numbering Scheme is not recommended till the time alternative methods are available to cater to requirement of mobile numbering resource.
- e. Since, the primary objective of this consultation paper is to meet the requirement of approx. 4.68 billion mobile numbering resources '0' + STD code be made mandatory for accessing fixed line from mobile/ fixed line and Mobile number to be dialled without '0' from mobile/ fixed line. This solution is non-discriminatory to any existing operator and will make available 7 Billion mobile numbering resources sufficient to cater to requirement of mobile even beyond 2050.
- f. All number string starting with '0' will be considered as fixed line while mobile numbers will continue in the existing pattern. International dialling pattern needs to be conveyed for appending "0" to the existing fixed line number. (e.g. for Delhi : +91011XXXXXX).

One of the member TSPs (RJIL) propose a different view as below:

- a. The Unified Numbering Plan should be implemented as soon as possible instead of any temporary solutions in the short term. Any technical feasibility study, if required

should be done now and the Unified Numbering Plan should be implemented as part of this exercise only.

- b. With regard to the option making mandatory '0' + STD code for accessing fixed line from mobile/ fixed line and dialling mobile number without '0' from mobile/ fixed line, RJIL has referred Para 2.12 of TRAI's recommendations dated 20<sup>th</sup> August 2010, mentions that 0 as a pre-fix to be dropped.

*"2.12 Some of the service providers suggested dropping prefix '0' from inter-service area mobile calls so that levels '7' and '8' can be allocated for mobile numbers without any conflict with the existing codes. The idea being that STD calls to SDCA's having codes starting with '7' and '8' would be dialling with a '0' while mobile to mobile calls would be dialed without a '0' avoiding conflict. This method, however, gives rise to some routing issues both in domestic and international calls. For instance, an incoming call from a Bangalore fixed number 23178696 to a mobile number would be recorded in the mobile in the format (country code)+N(S)N i.e. +918023178696. Now when the recipient uses this stored number to make a call there is a routing deadlock if the number 8023178696 is used for a mobile connection as well. Also all the levels of 7 that have been allotted for fixed numbers cannot be used for mobile. In the case international calls the format used is 00+Country Code+N(S)N. For example, the mobile number 7126534466 and the fixed number 6534466 of SDCA with code 712 would become same international number 00917126534466 giving rise to conflict in routing."*

Thus, according to RJIL, evidently prefixing of 0 is an idea that has been discussed, deliberated and dropped by TRAI.

Q2. If the answer to the preceding question is in the negative, which of the following options can be tried out? Please provide details and justification considering the advantages and disadvantages.

(i) Vacating the sparingly used fixed line levels '3','5' and '6' for allocation for mobile services

(ii) Accessing intra-service area as well as inter-service area mobile from fixed line by dialing prefix '0'; for generating more numbering resources for mobile services?

(iii) Shifting Data only mobile numbers from 10 digit to 13 digit numbering

(iv) Moving on to 11 digit numbering scheme for mobile and continuing with 10 digit numbering for fixed line services

(v) A combination of some of the above

(vi) Any other option

### **COAI Response**

- a. As stated above, we believe that unified numbering scheme should only be introduced if there is no alternative method to meet the future ascertained requirement of 4.68 billion mobile numbering resources till 2050.
- b. In this reference, we recommend the following options:
- c. We suggest that '0' + STD code be made mandatory for accessing fixed line from mobile/ fixed line and Mobile number to be dialled without '0' from mobile/ fixed line. '0' and STD code is already mandatory for accessing inter-SDCA fixed line from fixed line and well as intra-circle and inter-circle fixed line from mobile. The new modification will

mandate dialling fixed line with '0' and STD code for intra-SDCA calls also. This also requires mandating mobile numbers without dialling '0'. This solution will make available 7 billion mobile numbering resource to cater to the future need of mobile numbering series till 2050 and will involve minimal changes at the network, routing and interconnection requirements.

- d. While on the other hand, our member, RJIL feels that Unified Numbering Plan is the only lasting solution to the perennial numbering crisis.
- e. We believe that there is no justification or need for migrating to 11 digit numbering scheme for mobile number.

**Q3. Do the present criteria of utilization for allocation of numbers ensure efficient utilization of the numbering resources or would you suggest some other criteria?**

**COAI Response**

- a. We believe that the present criterion of allocation of numbers is very stringent and ensures effective utilization of numbers.

**Q4. Do you feel that sparingly used MSC codes may be withdrawn and reallocated to another TSP whose subscriber base is growing?**

**COAI Response**

- a. In case, it is not possible to meet the requirement of new MSC codes from the existing available series, DoT may consider withdrawing the sparingly used MSC codes.
- b. We believe that the MSC codes with utilization less than 10% may be considered for withdrawal subject to the condition that sufficient numbering series excluding the series being withdrawn is available to the operator for his future expansion needs.
- c. One of members RJIL feels that there should not be restriction on withdrawal of MSC codes basis the future business needs as that will make it very subjective, if a series is underused, it may be withdrawn.

**Q5. Do you feel that there is a need to file an "Annual Return on Numbering Resource Utilization" to the numbering plan administrator for monitoring and ensuring efficient utilization of number?**

**COAI Response**

- a. With reference to filing numbering return to the numbering plan administrator for monitoring and ensuring efficient utilization of the numbers it is pertinent to note that even now, whenever the operators are applying for a new numbering series, a lot of information regarding the utilization is sought by Licensor and the same is being furnished by the operators. Thus, there is NO requirement for a separate Numbering Return to be filed.
- b. The information suggested by TRAI includes most of the information being provided by the Service Providers while applying for additional numbers. However, it would not be possible for them to provide a three year forecast of demand within significant ranges. It

would be preferable to consider DoT's forecast of subscriber numbers for any analysis that is to be done by either DoT/ TRAI.

**Q6. What are your views on the pricing of numbering resources? If pricing is implemented should it be for all resources held by the service provider or only for future allocations?**

**COAI Response**

- a. We do not agree with Authority's proposal of pricing of numbers already held by operators and also for future allocations. The Authority is proposing an additional levy, over and above the already existing multiple levies on the sector and this is thus totally uncalled for.
- b. The Authority has stated that pricing of numbers would encourage operators to use the numbers more efficiently. In this regard we would like to submit that in our country, there are already stringent criteria laid down for allocation of numbering resources. The criterion was made more stringent by moving from HLR based to VLR based criteria in 2015 and 2017 where a VLR percentage of utilization of numbering series is to be demonstrated before new codes are allocated. Numbering series are NOT readily available to the operators.
- c. We would also like to submit that the Indian operators are already offering the lowest tariffs to the subscribers and their ARPUs are also one of the lowest. The service providers are already burdened with high levels of levies and duties and also the present financial crunch in the sector is very well known to all. In this scenario, any additional charge on operators for allocating numbers would act as an additional burden on the operators.
- d. In light of the above, it would not be fair to levy any additional levy on the operators in terms of pricing of numbers. This would act as an impediment in the growth and spread of telecom services in the country. We sincerely submit that there should not be any levy on allocation of numbering resources, since operators are already paying multiple levies and taxes to the Government.

**Q7. Do you feel that an automated allocation of numbering resources using number management system software is necessary to speed up the process of allocation and collecting returns in an efficient and transparent manner? Do you feel that this work may be assigned to an independent body by the licensor? Please provide details.**

**COAI Response**

- b. An automated allocation system allocation of numbering resources using number management system software would be required to speed up the process of allocation of numbering resource. The TSPs may apply on the automated system in a similar manner as they are applying now.
- c. We believe that this may be done by an independent body, however, the same needs to be under the control of the Licensor so as to maintain transparency.

**Q8. Do you agree that a revised and new National Numbering Plan and a consolidated list of short code allocations should be issued? If so, what should be the periodicity?**

**COAI Response**

- a. We agree with the Authority that various amendments have been made to the National numbering Plan, 2003 and there is a need for an updated single document. In fact there should be regular updates to the document.
- b. In this regard, we believe that the complete Numbering Plan document should be updated every two year.
- c. With regard to short codes, we believe that a list of the same needs to be uploaded on the DoT website and should be updated on a regular basis so that the users as well as public have recent information on all the short codes.

## *COAI Members*

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### **A. COAI Core Members**

1. Bharti Airtel Ltd.
2. Vodafone Idea Limited
3. Reliance Jio Infocomm Ltd.

### **B. COAI Associate Members**

1. Atria Convergence Technologies Pvt. Ltd.
2. Amazon Seller Services Pvt. Ltd.
3. Apple India Pvt. Ltd.
4. Ciena Communications India (P) Ltd.
5. Cisco System India Pvt. Ltd.
6. ECI Telecom India Pvt. Ltd.
7. Ericsson India Pvt. Ltd.
8. Facebook India Pvt. Ltd.
9. Google India Pvt. Ltd.
10. Huawei Telecommunication (India) Company Pvt. Ltd.
11. Indus Towers Ltd.
12. Juniper Networks Solution India Pvt Limited
13. Nokia Networks
14. Qualcomm India Pvt. Ltd.
15. Sterlite Technologies Ltd.
16. ZTE