

30th October 2019

To

Shri. U K Srivastava,

Pr. Advisor

Networks, Spectrum & Licensing,

TRAI

Sir,

Subject : - Consultation Paper on Developing a unified numbering plan for fixed line and mobile services

We are a 25 years old Voluntary Consumer Organisation (VCO) registered with TRAI. We offer our comments on the issues that were posed in the consultation paper on Developing a unified numbering plan for fixed line and mobile services.

Yours Sincerely,

GOPAL RATNAM V

Secretary

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COMMENTS on

Consultation Paper on

**Developing a unified numbering plan for fixed line
and mobile services**

Issues for Consultation

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

Yes, it is time that unified numbering scheme be introduced in India for the following reasons.

- i. Inter-modal portability is essential, especially to retain identity online and off-line. Today information is disseminated widely and hence repeated changes of number is proving to be difficult and highly inefficient.**
- ii. This would provide adequate numbering resources for the future. Shifting to a 11 or 13 digit numbering system is fairly easy at the service provider end with automation, but consumer would face huge hurdles in building their phone books and also dialing as with more digits the time and errors are likely to increase.**

The way to implement the unified numbering scheme would be by first method of shifting SDCA code.

This would enable less disruption at the consumer end. With millions of consumers from different backgrounds and capabilities, there would be a huge backlash. Change in phone books/directories, collateral materials etc would also entail an enormous cost.

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**

The answer to Q1 is positive and CCS endorses the view to shift to a unified numbering system.

In the transition to the unified numbering system, vacating the sparingly used fixed lines and allotting it to mobile services (option i) should be implemented to enable a transition time period for the legacy system to shift to the unified numbering system.

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?

With the market maturing and consequently a lesser number of new consumers entering the market, we propose the following for efficient utilization of the numbering resources,

- i. The allocation is done in smaller batches of MSC codes. Reduce from 10 codes (1 million) to 5 codes (0.5 million).
- ii. The return on the numbering resources to be filed with the numbering plan administrator be done semi-annually instead of annually.

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

Yes. Firms do create entry barriers for their competitors and hoarding of scarce resources is a old tactic.

However, the withdrawal of the codes should have clearly laid down process to avoid complaints and ensure efficient usage of the resources.

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?

Yes, a return on Numbering resource utilization is necessary but we suggest that it should be done every half yearly instead of annual.

As rightly emphasised in the consultation paper we feel that the numbering resources is scarce and should be used efficiently. Further is should not be used a tool in service provider’s strategy. By constant monitoring the concerned authorities can ensure efficient utilization and prevent possible misuse.

In addition to information that is mentioned to be included in the Numbering return, some additional information as mentioned in Q6. should be added.

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?

Any charge levied on the service providers, would be passed through to the ultimate consumer. Hence we suggest that ALL the numbering resources should NOT be charged.

With the Numbering Plan Administrator and a half yearly numbering return, there would less wastage and mismatch of the resources.

When the service providers charge their subscribers for allocating preferred numbers (vanity numbers), a certain percentage of these charges should be paid by the service providers to government. We suggest 50%. The rationale is that subscriber willing paying a higher amount for a particular number should be charged.

Auction for the vanity or special number will be a transparent way of price discovery and hence should be recommended option for charging for numbers.

All other consumers should NOT be charged as the number is a basic requirement to access the service and also any charge will be passed through to the consumer, increasing the burden.

The numbers that are auctioned or sold should be one more type of the information that is reported back to Numbering Plan administrator in the half yearly numbering return.

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.

Yes, the automated system would be more efficient and transparent. With a such a large quantity of numbering resources to be efficiently managed it would appropriate to have an automated system.

There is No need for an independent body. The licensor can itself be able to undertake this responsibility. This will ensure that there is not multiple authority with fragmented and silo based operations.

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?

Yes. A revised and new National Numbering Plan (NNP) should be issued.

Also a consolidated list of short code allocations be published. This is necessary as there are frequent changes in the allocation and usage. The periodicity of the list updation as suggested for the numbering plan is every six months.

Q9. Any other related issue.

An issue that has enormous ramifications but not addressed in the numbering resources management is the freezing of number before reallocation.

With the digital systems becoming more pervasive in consumer life, the mobile number become an important resource for the consumer. A large number of Indian consumers use Pre-Paid Plan. In the current system non-usage of the mobile number for more 3 months leads to termination of the services and loss of the number. A consumer may not renew the subscription for various reasons including forgetfulness, lack of money etc.

In such event, it is suggested that such numbers are not immediately re-allotted but kept frozen for a further period of 3 months. If the consumer within this period again subscribes to the service, then he should be allotted the same number to ensure continuity especially for financial transactions.

GOPAL RATNAM V

Secretary

CONSUMER CARE SOCIETY

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