

महानगर टेलीफोन निगम लि.

(भारत सरकार का उद्यम)

Mahanagar Telephone Nigam Ltd.
(A Government of India Enterprise)

6/c



No: MTNL/RA/TRAI CP/Unified Numbering Plan/2019

Dated 31.10.2019

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To

Shri U.K. Srivastava,
Pr. Advisor (NSL),
TRAI, New Delhi.

Sub: Comments on TRAI Consultation paper on "Developing a unified numbering plan for fixed line and mobile services" dated 20.09.2019.

Sir,

The MTNL's comments of on the Consultation paper "Developing a unified numbering plan for fixed line and mobile services" are as follows:

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

Comments: No.

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

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आप हमारे साथ हिन्दी में भी पत्राचार कर सकते हैं।

(vi) Any other option

Comments: In MTNL perspective, the option (i) appears to be most appropriate.

Justification: As per ITU ICT indicators report, 2018 the mobile cellular subscription density per hundred inhabitants for developed countries is 128 and fixed telephone subscription density per hundred inhabitants is 36.7. In India the numbering resources allocated for wireline are underutilized, but the main challenge is to ensure adequate resources for wireless services. Even if we assume a 200% wireless tele-density in India; in 2050 the total number of mobile telephones working in this country is likely to be nearly 3.28 billion. Assuming 70% utilization of the numbering resources, 4.68 billion numbers will be enough to cater to the mobile telephones working in this country in the year 2050.

The Numbering Plan Administrator has allocated numbers from level '9' and free sub-levels of level '7' and '8'. These three levels together would give about 2100 million numbers. If we can manage an additional 2600 million numbering resource, we may be able to tide over this crisis.

It has been mentioned in the consultation paper that, the fixed line levels '3', '5' and '6' are grossly underutilized. The total number of basic telephone connections in level '2' is 13.809 million and that in level '4' is 4.293 million (as on 30th June 2019). MTNL suggests that all the numbers of private Telcos be subsumed under level '4' for better utilization. Sparing of level '3', '5' and '6' for mobile communication under 10 digit regime will spare 3000 Million capacity which shall be sufficient to fulfill the requirement. Considering lesser penetration of private Telcos in fixed line services, this step shall not be very disruptive. This will also lead to efficient utilization of the numbering resources. All the spare levels of level '3', '5' and '6' can be used for allocation for wireless MSC codes after taking into consideration the existing SDCA codes in these levels.

It is further submitted that most of the numbers of the private Telcos are being utilised by Enterprise business customers who use it for promotional calling; whereas the numbers of Telecom PSUs are generally not used for promotional calling. Therefore Level allocated to MTNL/BSNL has distinct Identity/Brand Image. Any attempt of subsuming any private telco within this level could severely hamper this brand image.

As far as option (ii) is concerned, following compelling disadvantages are submitted below:

Disadvantage of option (ii): 1. Presently in MTNL Delhi PSTN, STD facility is provided on subscriber request and many numbers are working as without

STD or "STD BAR" numbers. In view of option (ii), for accessing intra-service area as well as inter-service area mobile from fixed line, dialing with prefix '0' will be required and therefore STD facility will be required to be extended to all subscribers of landline mandatorily. This may lead to many operational difficulties including enormous complaints from subscribers for misuse of STD facility.

2. The landline subscribers will be required to use their dynamic lock facility carefully and judiciously, which will involve additional operational problems.

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?

Comments: Yes.

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

Comments: No.

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?

Comments: Yes.

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?

Comments: Operator should not be allowed for inefficient utilization of numbering resource. However, no fee for number should be charged.

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.

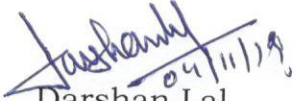
Comments: No. The present system appears to be robust and effective.

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?

Comments: Yes. The periodicity for consolidated list of short code allocation should be yearly and for revised and a new National numbering Plan should be five yearly.

Q9. Any other related issue.

Comments: NIL.


04/11/19
Darshan Lal
DGM(RA&C)