



**QTL/Reg/TRAI/1911/1089**

November 13, 2019

**Advisor (NSL-II)**

Telecom Regulatory Authority of India,  
Mahangar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg (Old Minto Road),  
New Delhi — 110 002

**Kind Attn: Shri Syed Tausif Abbas**

**Sub: M/s Quadrant Televentures Limited (“QTL”) Comments on “TRAI Consultation Paper on developing a unified numbering plan for fixed line and mobile services”**

Respected Sir,

This is with reference to your above mentioned consultation paper. In this regard, please find enclosed M/s Quadrant Televentures Limited (“QTL”) response for your kind consideration.

Thanking you,

Yours sincerely,  
For, **Quadrant Televentures Limited**

A handwritten signature in blue ink, appearing to be "S. Tausif", is written over the signature line.

**Authorized Signatory**

Encl: As sated above

**QUADRANT TELEVENTURES LIMITED**

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**M/s Quadrant Televentures Limited (“QTL”) Comments on “TRAI Consultation Paper on developing a unified numbering plan for fixed line and mobile services”**

QTL question wise submission/comments in respect to TRAI Consultation Paper on Developing a unified numbering plan for fixed line and mobile services is as under:

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

Ans. India has two primarily different numbering schemes i.e. SDCA Based for Fixed-line services & Separate series for Mobility services. In addition to these series, a separate M2M 13-digit numbering scheme also been issued recently.

Unified Numbering Scheme will require huge changes in the prevailing network Architecture, routings, Billing / Mediation / Provisioning processes.

In our opinion, Unified Numbering Scheme is not recommended in the existing scenario , however , same can be taken up at a later stage once complete consolidation as suggested in this document are agreed upon to be implemented and executed.

**Q2 (i). 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.**

Ans. Vacating subscribers from existing fixedline levels 3,5,6 is not an option as fixedline numbers are being extensively used by major Corporate houses , Banks, Financial Institutions etc , thereby disturbing their National and International reachability , customer complaints etc.

**Q2 (ii). Accessing intra-switch area as well as inter-service are mobile from fixed-line by dialing prefix '0'; for generating more numbering resources for mobile services?.**

Ans. We suggest that all calls originating from SDCA based fixed-line numbers towards Mobility numbers should be prefixed with '0' whether the call is to be terminated in intra-circle or intra-circle. In addition, we also suggest that even local calling should also be changed to '0'+SDCA+Number.

This suggested change will involve configuration changes at operator side Core network and may take little more time for implementation in rural exchanges; also customer has to be suitably guided that for calling any mobility number, '0' has to be prefixed.

Once implemented, a uniform calling pattern will be established from fixed-line numbers towards all networks whether Local, intra -circle other SDCAs, inter-circle other SDCAs, local mobile & inter-circle mobile.

If complete calling is allowed with '0' prefix; then the concern of SDCA Codes starting with '1' and its clash with emergency services will also be addressed.

**Q2(iii). Shifting Data only mobile numbers from 10-digit to 13-digit numbering.**

Ans. Yes, the data only mobile numbers should be shifted to 13-digit numbering. This will help in segregating the voice + data from pure data based customers. Though it will involve requisite changes at operator network side but minimal changes will be required at customer end.

**Q2 (iv) Moving on to 11-digit numbering scheme for mobile and continuing with 10-digit numbering for fixedline services**

Ans Moving on to 11-digit numbering scheme for mobile will involve huge costs for carrying out Upgrades in the existing Network Nodes , IT Nodes , Billing Nodes on the TSP side. On the customer end, any change in their existing numbers may disrupt their services, reachability and complaints.

**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.**

Ans. The present criteria for allocating Mobile Numbering Series is stringent however , utilization of fixed-line numbering series in a Service Area cannot be determined on the basis of overall capacity distributed across all SDCAs i.e. for a Fixed-line service operator, since the DN is allocated on SDCA basis; the number series utilizations should also be considered on the basis of individual SDCAs and if some SDCAs are having 90% utilization , some have 50% utilization while others have 25%, in such a case the series should continue to be retained by Operator.

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

Ans. Yes, series/MSC code optimization has to be carried out for its optimal use and the customers residing in these series can be ported to their parent network before such re-allocation happens.

**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?**

Ans. Yes, there is a strong need for devising the mechanism to review the Numbering Resource Utilization annually allocated across operators. The authority responsible for allocating Numbering Resources should also conduct Audits across Operators for the Numbering Series and should take appropriate action for the return of the same if underutilized.

**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?**

Ans Pricing of Numbering resources is not recommended.

**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? Pls provide details.**

Ans Yes, we should start working towards automation; however, this process has to be carried out either centrally by an autonomous body deputed by TRAI or all the operators together assign the same to an independent agency. But it will be more appropriate to start with the same once the above stated changes / mechanism are in place as it will provide a better picture of the utilization of the series.

**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?**

Ans. A consolidated list of short code allocated by DoT should be available on the website. The agencies that have been allocated short code should submit annual report regarding utilization of the same providing details of the call attempts / answered calls.

In addition to the standard code allocation, operators have also allocated short codes internally to its own customers; there should be some guidelines for allocation of the same to avoid any clash with the short codes being allocated by DoT in future also.