RELIANCE

**Comments on   TRAI Consultation Paper
on**
**" Developing a unified numbering plan for fixed line and
mobile services "**

Reliance Communications Ltd welcomes opportunity extended to comment on the above captioned consultation paper. It is important to keep in mind that any review and modification in numbering plan should consider the impact on all stake holders including the subscribers/consumers.

RCOM's specific comments on issues raised in the consultation paper are given below:

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

RCOM Resp:

Unified number scheme introduction would not be long term solutuion to Indian Telecom sector's number requirement.

Subscriber number planning in a country should be done for a minimum time horizon of 30 Years . As per the UN's "World Population Prospects, 2019 report, India is projected to become the most populous country by 2027 surpassing China, and host 1.64 billion people by 2050. The population is supposed to peak at 1.6518 billion in the year 2059 and gradually start declining thereafter. Even if we take a target 200% wireless tele-density in India; in 2050 the total number of mobile telephones working India is likely to be nearly 3.28 billion. Assuming 70% utilization of the numbering resources, 4.68 billion numbers will be required to cater to the mobile telephones working in this country in the year 2050.

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

RCOM Resp:

- **RCOM supports moving onto 11 digits numbereing scheme for mobile and fixed line services at the same time. This solution will address number requirement on a long term basis and will have least inconvenience for all stake holders including consumer, service providers and number administrator.**

- **We may prefix 9 and 2 in the existing mobile and wirline numbers respectively to avoid inconvenience during the migration . An uniform messaging to all stakeholder including subscribers can be done in this approach resulting in smooth migration . Further there would be no change in dialing pattern for the subscriber.**

- **All TSP have already configured their system for 13 digits M2M numbers , hence all internal systems of the operators are ready for supporting 11 digits for Fixed/mobile services as well. Thus 11 digits mobile number/wireline number would not be a challenge for them. Any changes to be done on the SIMs can be done "Over the Air".**

- **"To provision broad band for all" is the first strategic objective to be accomplished through The National Digital Communications Policy-2018 . Enable fixed line broadband access to 50% of households is one of the seven Goals which are supposed to be achieved through the National Digital Communications Policy-2018. Moving onto 11 digits numbereing scheme for mobile and fixed line services will enable removing this bottleneck to the growth in wireline business and will ensure availability of enough number resource for wireline subscribers.**

- **Vacating of any numbering already in use would create immense issues for the subscribers especially corporate subscribers who have put out their numbers across the globe. Also level 5 is used LRN , hence vacating of levels is not the solution to the issue.**

- **Moving to 11 digit would allow the future expansion. Once we run out of sub levels for fixed line then another level 3 could be opened. Similarly with mobile, level 8 could be opened once level 9 with 11 digits is fully utilised. This also gives flexibility to open another level for VOIP services if so desired.**

- **Even if we consider the Internation Experience , All comparable economies like China and Brazil, they have already implemented 11 digits number in their mobile network. Other countries which are operating in 10 disgits have lesser population and smaller telecom network in comparison to Indian Telecom Network.**

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?

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

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?

RCOM Resp:

NA in the light of response given in Q2 .

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?

RCOM Resp:

We do not support the pricing of numbering resources as it will put additional stress on already stressed Indian Telecom operators.

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.

RCOM Resp:

We support an automated allocation of numbering resources using number management system software . MNPSPs are best positioned to carryout this activity.The number management system would also be able to give details of the utilization of the allocated numbering resources. It acts a bridge between the numbering plan administrators and the telecom service providers and increases the overall transparency and efficiency of the number allocation process as well as its utilization.

Further this would help in case any number series is returned by any operator and reallocated to another operator as the system would then capture the working numbers and avoid hassles to the subscribers.

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?

RCOM Resp:

We strongly agree that a revised and new National Numbering Plan and consolidated list of short code allocation should be issued on yearly basis. This will resolve the charging and access related issues for the short codes issued by DOT . This also address the White Listed code access issues.