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February 17, 2010

The Chairman  
Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg  
Old Minto Road  
New Delhi 110 002.

Kind Attn : **Mr Lav Gupta-Principal Advisor (I&FN)**

Sub : **Consultation Paper on Efficient Utilization of Numbering Resources**

Dear Sir,

We strongly believe that the requirement of numbering resources in India can be easily managed without changing the number length for mobile subscribers from 10 digits to 11 digits or making any major changes in the numbering scheme for fixed line subscribers. At present six levels (levels 2, 3, 4, 5, 6 & 7) have been reserved for fixed line subscribers whereas only level 9 and a part level 8 are being used for mobile numbers. However, it should have been the reverse as there are less than 40 million fixed line subscribers compared to more than 500 million mobile subscribers at present. Moreover, while new mobile subscribers are rapidly increasing by 12-15 million per month, the teledensity of fixed line subscribers is going down.

We are at present having SDCA based linked numbering plan for fixed line subscribers and country wide linked numbering plan for mobile subscribers. Accordingly every mobile number is unique in the country and not re-useable in different service areas. There is no need for STD pre fix "0" to be dialed for inter circle calls to mobile subscribers. We,

therefore, suggest that "0" dialing for inter circle calls to mobile subscribers should be dispensed with rather than introducing "0" dialing for intra circle calls to mobile phones as suggested in the Consultation paper. This will enable us to use complete level 8 for mobile numbers without changing any existing SDCA code beginning with "8". Digit "0" will then virtually become an integral part of a SDCA code instead of being used as service prefix for STD.

Though, some numbering resources on level 7 have been allocated by the DoT to a new UAS Licensee for fixed line services in various service areas, the service has not yet been launched by the company in any service area so far. The company may be re-allocated their numbering requirement for fixed line service on any other level being used for fixed line service (level 3 or 4 or 5) and level "7" may be reserved for future requirement of mobile numbering resources.

Level "5" is presently being used for fixed line services by HFCL Infotel in Punjab and Sistema Shyam in Rajasthan. This level is not being used in any other service area for fixed line services so far. We suggest that incumbent operator who has been allocated level "6" for fixed line services for different service areas be also shifted to level "5". This can be easily done by changing the first digit from "6" to "5" in all service areas except Punjab and Rajasthan where change in individual subscriber numbers may be necessary as HFCL and Sistema Shyam Teleservices Ltd. are already having subscribers on level "5" in these circles. As on 31<sup>st</sup> Dec, 2009 the concerned operator had 14574 fixed line subscribers in these two service areas. Therefore, level "6" can be easily spared for future requirement of mobile numbering resources by minimal inconvenience to a small number of fixed line subscribers in Punjab and Rajasthan.

With the implementation of above suggestions, we will have levels 2, 3, 4 & 5 for fixed line subscribers and levels 6,7,8 & 9 for mobile subscribers in India. Therefore, with 10 digit numbering scheme for mobile service we will have 4 billion numbers available for mobile subscribers in India and even at 60% utilization we can have 2.4 billion subscribers – a teledensity of more than 200%. This should be adequate for the next 20-25 years.

Changing of mobile numbering scheme from 10 digits to 11 digits will result in change of phone numbers for each of more than 500 million mobile subscribers in the country. This will defeat the entire purpose of introducing Mobile Number Portability in the country at huge expense for all the operators as every mobile number will get changed. A longer number length will require more digit analysis for routing the calls, increasing the call processing time and would need augmentation/up-gradation of equipments. Modifications of more than 500 million SIMs at huge cost to the service providers and inconvenience to subscribers would also be required. This will also be consumer unfriendly as "11" digit numbers will be more difficult to remember, particularly for fixed line subscribers who do not have phone book facility in their telephone sets.

In the light of the above we are giving our detailed inputs for each of the questions raised in Chapter 4 of the Consultation Paper.

**Q1. Do you believe that 10 digit numbering scheme should be continued? If yes, then what method(s) do you suggest to make adequate resources available for next five years i.e. up to December 2014 and beyond?**

Ans: We strongly believe that 10 digit numbering scheme should be continued and there is absolutely no need to increase the number length to "11" digits. Adequate numbering resources for mobile subscribers in India can be easily made available for the next 20-25 years by making the minimal changes in the existing National Numbering Plan (NNP) as given below :-

- a) Remove "0" dialing for inter-circle calls to mobile subscribers as each mobile number is unique in the country and is not repeated from one service area to the other.
- b) Re-allocate fixed line numbering resources to new UAS Licensee from level "7" to any of the other levels used for fixed line numbers (level 3 or 4 or 5)

- c) Shift fixed line subscribers of incumbent operators on level "6" to level "5" which is presently being used exclusively by HFCL and Sistema Shyam Teleservices in Punjab and Rajasthan service areas respectively. This will result in minimal inconvenience to a few thousands subscribers in these two service areas. In other service areas this will involve change of only the first digit of the fixed line number from "6" to "5" which can be easily done without much inconvenience to the subscribers.
- d) Reserve levels 6,7,8 & 9 exclusively for mobile numbers. There is no need to shift any of the existing SDCA codes on these levels if "0" dialing is dispensed with for inter-circle calls to mobile subscribers.

If the above suggestions are implemented, we will have 4 billion Mobile Numbering Resource available which should be adequate for the next 20-25 years.

**Q2. Comment on the advantages and disadvantages of accessing intra service mobile from the fixed line by dialing '0' for generating more number resource for mobile services?**

Ans: Introduction of "0" dialing for intra service area calls to mobile subscribers will effectively increase the mobile number length to "11" digits. Moreover, all the sub levels which are presently allocated for SDCA codes will be unavailable for mobile subscribers and hence only the marginal additional numbering resources will become available. On the contrary, we suggest that dialing "0" for even inter-service area calls to mobile subscribers from both fixed line and mobile phones, should be dispensed with. Every mobile number in the country is unique and is not repeated in any other service area and hence there is no need for dialing any STD prefix. Earlier when STD calls were highly expensive as compared to local calls STD service prefix "0" was introduced so as to provide STD barring facility to fixed line subscribers. With steep fall in the STD tariff over the years, there is no need for this facility any more.

**Q3. Do you believe that the only solution to the number resource problem is to migrate to an 11 digit numbering scheme for mobile and retaining 10 digits numbering scheme for fixed line? What kind of problems do you foresee in having a mixed numbering scheme?**

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**Q4. If your preference is 11 digit numbering scheme for mobile services then what comment on the advantages and disadvantages of such a scheme.**

Ans: As mentioned in reply to Q.1 there is no need to migrate to "11" digit numbering scheme for mobile subscribers. Adequate numbering resources can be easily made available by making minimal changes in the existing National Numbering Plan and consequently minimal inconvenience to a small number of fixed line subscribers. Migration to "11" digit numbering scheme will have the following disadvantages :

- a) Mobile Phone Numbers of more than 500 million subscribers will get changed resulting in huge inconvenience to the subscribers.
- b) "11" digit numbering scheme will not be consumer friendly as a longer number length will be difficult to remember, particularly for the fixed line subscribers who do not have the facility of phone book in their instruments.
- c) A longer number length will require more digit analysis for call routing resulting in increased processor load of IN/HLR/VLRs/SMSC. This will result in reduction in the capacity of the existing equipments which will have to be augmented at considerable expense.
- d) All the international roaming agreements will need to be amended and international roaming services re-tested in various international networks.

- e) MNP, which is being introduced in the country shortly at a huge expense will become meaningless as all the mobile numbers will get changed in one go.
- f) "11" digit numbering scheme will have considerable impact on the telecom systems in terms of depth of analysis, data base changes and increased processor load and memory utilization.
- g) A number of CLI display devices in India are capable of displaying maximum of 10 digits and therefore will not be able to display complete CLI of the mobile numbers. This may have security implications.
- h) SIM cards of more than 500 million subscribers will have to be modified at a great inconvenience to subscribers and service providers.
- i) All the operation and billing support systems like provisioning, mediation and CRN will need to be modified/upgraded to suit the new numbering scheme.

**Q5. Comment on advantages and disadvantages of migrating to integrated service area based scheme for fixed and mobile. If this scheme is adopted what should be the time frame for migration?**

Ans: At this stage when we have already more than 500 million subscribers in the country it does not make any sense in carrying out any fundamental change in the National Numbering Scheme. Most of the disadvantages mentioned above for migrating to "11" digit numbering scheme will also be applicable for migration to integrated service area based fixed and mobile numbering scheme. Not only all the mobile numbers but also the fixed line numbers in the country may have to be changed.

**Q6. Do the present criteria for allocation of the numbers ensure efficient utilization of numbering resources or would you suggest some other criteria?**

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**Q7. With reference to Para 3.3.1, comment on the need to file a numbering return to the numbering plan administrator for monitoring and ensuring efficient utilization of the numbers?**

Ans: The existing criteria for allocation of numbering resource to telecom service providers should be continued. Already complete information is being given by service providers regarding utilization of the allocated numbering resource whenever applying for additional allocation. If any further information is required by the Numbering Plan Administrator for determining whether earlier allocation of numbers is being efficiently utilized, the same could be included in the proforma prescribed for application for additional numbering resources.

**Q8. Give your views on pricing of numbering resources? If pricing is implemented, what should be the method adopted for such pricing.**

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**Q9. If pricing is implemented should it be for all resources held by the service providers or only for future allocations?**

Ans: There is no need for pricing of numbering resources with a view to ensure their efficient utilization by the operators. Unlike spectrum, the numbering resource is not limited. Its capacity can be increased by adopting longer number length and proper allocation of numbering resource for different services like fixed line, mobile and IP based numbering scheme. While in some countries the numbering resource is being charged for, in a large number of countries there are no charges for this resource.

In India more than 25% of the total revenue is being charged by the Government in the form of different levies like License Fee, Spectrum Charges, Service Tax etc. With cut throat competition prevailing in the

country, tariffs of mobile services have already fallen to ridiculously low levels resulting in probably the lowest ARPUs in the world. It will be impossible for the operators to absorb the additional charges for Numbering Resources. These charges will, therefore, get passed on to the consumers. In our view, charging for numbering resource may not result in its more efficient utilization as there are no advantages to the operators in not utilizing this resource efficiently.

Thanking you,

Yours truly  
For **Loop Mobile (India) Limited**

**D B Sehgal**  
**Advisor**

CC : For information to :

1. Mr R N Prabhakar-Member, TRAI
2. Mr R Ashok-Member, TRAI
3. Mr R K Arnold-Secretary-TRAI



