

Regulation Cell,  
5<sup>th</sup> Floor, Bharat Sanchar Bhawan,  
Janpath, New Delhi – 01  
Tel.: 011 – 2373 9295 Fax: 2373 4282  
Email : agmregln@gmail.com



भारत संचार निगम लिमिटेड  
(भारत सरकार का उपक्रम)  
BHARAT SANCHAR NIGAM LIMITED  
(A Govt. of India Enterprise)

To,

Pr. Advisor (NSL)  
Telecom Regulatory Authority of India  
Mahanagar Door Sanchar bhawan  
Jawahar Lal Nehru Marg (Old Minto Road)  
New Delhi-02

No. Regln/ 4-18/2015/ 9397

Dated: 13-11-2019

[Kind Attn: Shri. U.K. Srivastava]

Sir,

**Subject:** BSNL comments on TRAI Consultation Paper on "developing a unified numbering plan for fixed line and mobile services"

Kindly refer to the TRAI Consultation paper dated 20-09-2019 on "developing a unified numbering plan for fixed line and mobile services". In this connection, point wise BSNL's Comment on the aforementioned consultation paper is as below:

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

**BSNL Reply:**

No, BSNL does not think there is any requirement of introducing unified numbering scheme in India. Unified numbering scheme will have very adverse impact on the Wireline customer base and will affect BSNL the most.

Besides, BSNL perspective, the worst sufferers of unified numbering scheme will be the customers.

1. As per the present numbering scheme the wireline numbering has geographical and location significance. When a customer dials a distinctive landline number of any office or home, it is known that it will be replied from a particular geographic location. The physical location of fixed line brings a lot of substance and value to the call. This is very much unlike wireless number which is largely personal and dynamic, and the dialing customer has no idea of the location of the dialed customer. For emergency, official and business purposes, fixed line is necessary and it is very much necessary that the dialing customer knows that dialed number is fixed line.
2. **Many times verification is done by many different entities by dialing fixed line number only.**
3. **Fixed line bill is also authentic document for address verification and the same is used as authentic address proof even for providing many Government services to citizens. Thus, having a distinct fixed line numbering separate from mobile numbering scheme is required.**
4. Existing dialing digits, especially local dialing, where the digit dialed is 6 to 8 digits are easy and comfortable to remember and recall than a 10 digit number.

-114-

**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. Authority has already mentioned that moving on 11 digit numbering scheme will require many changes in existing system as well as changes in indicator of customers. It will lead to great inconvenience to customers. Demand for mobile number requirement can be fulfilled by rearranging in existing 10 digits number allocation plans.
- (v) A combination of some of the above
- (vi) Any other option

**BSNL Reply:**

The various options above have been detailed in the Consultation Paper. In the Consultation Paper, it is stated as – **“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. The following options are explored to get around the problem of shortfall of numbers.”** Further, it is also stated that **“Currently, we have about 1.2 billion**

**telephone subscribers”** and that **“....a total capacity of 2100 million numbers exist in levels ‘9’, ‘8’ and ‘7’.”**

In para 2.39 of the Consultation Paper under sub-para (iii) **Mandating dialing prefix ‘0’ for calling mobile numbers from fixed line**, it states as:

***“This arrangement would provide a capacity of around 2.5 billion mobile numbers. No change in dialing plan of fixed to fixed, inter-circle fixed to mobile and mobile to mobile is required. Implementing this option should not be a difficult proposition as the subscribers already need to use ‘0’ for calling adjacent SDCAs and for mobile numbers in other service areas.”***

BSNL does not support any proposal which will change dialing plan and have drastic effect on the dialing habits of all customers or which requires further reconfiguration at Switch level and routings. Today, when the whole Telecom Industry is reeling under huge debts and fighting for survival, any change in the existing dialing and routing schemes will have detrimental effect.

In view of the same, BSNL proposes that a step by step procedure is required for creating additional numbering resources to meet the projected demand for next 20 years or more. Some immediate steps may be:

1. In this regard, TSPs may be asked to optimally utilize existing numbering resources at their disposal before placing further requirements. The current utilization ratio of 1200/ 2100 must be increased for optimal utilization of existing numbering resources.

2. CDMA and GSM level must be merged and accordingly huge numbering resources can be made available from level '92' and '93'.
3. Option (iii) i.e. **Shifting Data only mobile numbers from 10 digit to 13 digit numbering** needs to be exercised immediately, which will also free a large numbering resources in existing '9', '8' and '7' levels presently being utilized for data only purposes. It has been observed that in case of RCOM – while the operator closed its mobile voice service; however, it continues to provide data services and SMS which in effect does not require any dialing for voice call.
4. Option (i) i.e. **Vacating the sparingly used fixed line levels '3', '5' and '6' for allocation for mobile services** may be exercised next to free additional **2.5 billion mobile numbers** as stated in TRAI's Consultation Paper stated above.

The resources thus generated will be enough to meet the requirement for up to 2050 and more.

Option (iv) may not be required in the near future in next 20 years and by then the technological development, TSPs consolidation and customer awareness will easily facilitate in its smooth transition.

Option (ii) i.e. **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** is not favored especially in consideration of large rural customers and customers who require dynamic locking facility. Any change to existing dialing plan is not suitable to large customers.

**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?

**BSNL Reply:**

Criteria of utilization of allocation of numbers have been reviewed by DoT from time to time and present criteria is efficient. However, as discussed by the Authority in chapter 3 mechanism may be devised to submit a detailed "Annual Return on Numbering Resource Utilization" to the Numbering Plan Administrator every year.

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

**BSNL Reply:**

The current subscriber growth rate of TSP whose MSC codes are being withdrawn is to be taken into account before deciding the withdrawal and reallocation. Sometimes it is business requirement of corporate customers for allocation of continuous number block therefore, some series may seem to be underutilized but it needs to be reserved.

**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?

**BSNL Reply:**

Licensors are asking the utilization of numbers from time to time and same is being provided as per DoT requirement.

**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?

**BSNL Reply:**

Numbers are necessary to provide the services to subscriber and till now these are being provided free of charge by licensor. TSP are already paying significant cost to acquire the license, spectrum etc. Moreover, TSP also pay the license fee and SUC based on their AGR. Logic of earning by auctioning the premium numbers by service provider and not efficient of use of allocated numbers by TSP for imposing the charges for allocation of numbers is not justified. TSP is already paying the license fee on this revenue hence it includes the revenue generated from the auction of premium number. Non-efficient utilization of number resources is already being monitored by the licensor based on VLR. As numbers are necessary to provide the services hence, these should be provided free of charges by the licensor.

**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.

**BSNL Reply:**

Allocation of numbers to a TSP is in general done to cater the requirement for a sufficient long period. Further additional requirement of numbers by any service provider can be accessed in advance and the request can be raised to the licensor. Allocation of numbering resources using number management system software or any other means is internal process of licensor. However, to bring the transparency it is submitted that licensor may provide the access to TSP to view the number resources allocated to various TSPs in public domain or in restricted manner through authorized access. It is also pertaining to mention that acquiring number management software or assigning the task of allocation to third party will involve the extra cost which may ultimately to be borne by TSPs. At this juncture it does not seem justified to bear such cost by TSPs. Collecting of the return through some online process by licensor in prescribed format may speed up the process.

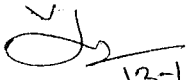
**Q8.** Do you agree that a revised and new National Numbering Plan and a consolidated list of short code allocations should be issued? If so, what should be the periodicity?

**BSNL Reply:**

Unless and until any drastic change in the existing numbering plan has been proposed, there may not be any need and requirement for a revised and new National Numbering Plan and a consolidated list of short code allocations. Similar to what we see in Regulation amendments and License amendments, NNP amendments may be issued, if and when required.

**Q9.** Any other related issue.

**BSNL Reply:** No comment

  
13-11-19  
(Ved Prakash Verma)  
AGM (Regulation-II)