

To
Shri Arvind Kumar
Joint Advisor (I &FN)

Dear sir,

Ref.F.No.413-1/2010-I&FN dated 5th February 2010 It was indeed a matter of great and immense pleasure to receive a print copy of the consultation paper for our comments to be posted in the website. We were really disappointed. We never received consultation papers for comments during 2008 and 2009,so we are really happy and thankful to you for recognising us. We wish that in the future too the issues compiled by you will be send to us. With regards,

Dr.T.Balachandran
President, Kerala consumer Service Society
Nandanam, Ranadhive Road,Edappally,Kochi-682024

**Comments On The Issues Raised In The Consultation Paper No.2/2010 On
“Efficient Utilization Of Numbering Resources” Released On 20/01/2010**

Question 1

The 10 digit numbering scheme shall be continued for fixed line as none of the 22 countries, listed has ventured for 11 digits. Also it is likely that the fixed lines may soon disappear and become absolute/extinct even before 2014. As such, one need not worry about adequate resources after 2014. A decision to reduce even the area codes is most welcome. The 10 digit mobile number too may be retained. Resources for the increased demand after 2014 may be solved as per following answer.

Question 2

Retaining the 10 digit scheme making access of mobile by dialing “0” from a fixed line phone within a service area also (at present exempted from “0” use), can generate more number resources (around 3 billion) for mobile services. This is possible using all the free sub levels 2 to 6. At present subscribers are already using “0” for calling adjacent SDCAs and also for mobile numbers in other areas.

Question 3

No one probably believes that migrating to 11 digit numbering scheme for mobile and retaining 10 digit numbering scheme for fixed line can solve all resource problems as we are in India 2010. Definitely mixed numbering schemes are welcome. On an all India level, vacating few levels and sub levels will be advantageous while it can cause some inconvenience to certain pockets.

Question 4

We don't prefer 11 digit numbers for mobile. The disadvantages on 11 digit numbering scheme for mobile phones are vast compared to few advantages. Fully agree with the anticipated problems mentioned in 2.1.2.4. in the text.

Question 5

Migration to integrated service area based scheme is the need of the hour as this would enable implementation of number portability between fixed line and mobile networks. It has got the added advantage of avoiding access code "0" for inter services area calls. Time for migration, for changing data base can be within a short span of 6 months.

Question 6 and 7

As the present criteria for allocation of the numbers are arbitrary assumptions, based on money power and annual numbering returns, the present Numbering Plan Administrator can be replaced by a specific audit group to ensure transparency and accountability. Details and procedure to prevent unfair and restricted trade practices by stake holders prevalent in other countries may be ascertained.

Question 8

It is true that various countries charge numbers adopting different approaches. That does not mean that India, where majority are below poverty line, also must pay charges. Of course, charges for vanity/ preferred numbers are widely adopted for higher revenue. If charging for the numbers allocated to operators is to be used as a tool to encourage efficient use of numbering resources, the charges should be substantial, say Rs.100 per annum. This amount shall not be passed on to consumers. The statements in 3.4.3 are unwarranted.

Question 9

If DOT is firm for collecting charges, it shall be only for future allocation to consumers, at low rates.