Dear,

Further to the subject matter on the Consultation paper on efficient Utilization of numbering resource, please find the question no : 6 which I may like to provide my feedback.

Though I do not represent any Service provider from India, Im an Indian and am currently heading the Fixed Voice Product team with a UAE based incumbent telco. Our team here has recently responded to the National numbering consultation paper for the regulator and I would like to share some of the points which I feel have not been addressed in the overall consultation paper which may provide a guideline if the TRAI receives a response from the Service providers.

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

Ans.) Some of my comments are as follows :

1) There may be a requirement of certain Telcos to come up with a Numbering level which is primarily used for business customer to allow their staff to REMOTELY ACCESS SERVER resources by Dialling from their PC. This is mostly a data connection but allows a dialup VPN type of Service to exist over the Fixed Network. Different levels of this service can provide for different charging mechanisms that can be followed by various operators.

2) I see that there is not a lot of exploitation of the Fixed IN Platform yet in India. Besides the Regular TOLL FREE, there are a host of other services that can be provisioned from the other IN platforms. Lets begin with what you have today. As you would know the Toll free service, the call charges are borne by the 1-800 subscriber, various organizations may like to co-relate their Toll free Number with the name of the company which may follow : 1-800-myname. A Numbering plan may need to be advised to operators who are planning such services.

3) Another example for a service that can be created from IN platforma would be an Exact Mirror image of the toll free service. Which is also a Non Geographical number but this is NOT reversed charged. So a business (Bank) can subscribe to a 1-600 level , the caller does not need to remember different numbers for the same bank in different cities. The Call center can be designed in such a way that a Call coming from Delhi to this level gets answered in Delhi and so on. This call is charged to the Caller.

4) Shared Revenue : IN platforms are also capable of selling content over the network whereby there is a revenue shared model agreed by the Company (Content provider) subscribing to the Numbering level with

the Operator . This is a Premium service whereby the Caller knows that he would pay for eg Rs 10 / minute whereby there is a revenue sharing agreement between the Content provider and the operator.

5) Im sure the TRAI is working on VoIP as a regulated service. I can see that MNP may involve an additional digit. However, VoIP trunk (SIP Trunks) which have replaced traditional E1/ PRIs in other countries, is also around the corner, once the Qos and SLA on the Bandwidth gets resolved by the operators . How does the TRAI want to address the Numbering plan for such SIP Trunks which would also require a Non Geographical numbering level. Such a Numbering level should be clearly identifying that the CLI being received is from a Non Geographical number and is associated to a business entity. This may be important as the Business subs having VoIP (SIP Trunks) and private circuit between 2 Cities would otherwise display a CLI which may not denote the actual location of the Caller which should have been the case for a Caller calling from a Fixed network.

6) Last but Not the least, most regulations which have Carrier Select , MNP and VoIP have implemented ENUM which is a mechanism which maps an E.164 number to a domain name. It is a called party service and the subscriber can subscribe to ENUM . Subscription to such a service may allow the subscriber to write his various preferred destination numbers to reach him on a name server (Registry) . The country code top level domain (CCTLD) is maintained by the regulator (TRAI) who then allocates the job of a Registry to a neutral company. The Service providers in this context get referred to as REGISTRARS offering Carrier Selection , MNP and VoIP can place their subscribers preferred contacts in their own database which are all authorised by the CCTLD. As a matter of fact I was surprised to note here that the TRAI does not even have their own name server (CCTLD) running the country code: 1.9.e.164.arpa. Are there no plans ?

Regards,

SALIL AHUJA
GSM : +971 50 4575371