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Sub: Response to consultation paper no. 02/2010 on efficient utilization of numbering resources

Dear Sir,

Thank you for taking out a comprehensive consultation paper no. 02/2010 on efficient utilization of numbering resources and giving us a chance to respond to it.

At the first instance, we will like to mention that only example of countries with large populations (similar to India) and high tele density (which India is already achieving) should be taken into account while formulating a policy. Taking examples of countries like Australia, Belgium, Denmark, Finland, France, Greece, Hong Kong, Hungary, Italy, Netherlands, New Zealand, Pakistan or even UK may provide a totally wrong comparison with a market like India.

North America (USA, Canada, parts of Caribbean and Central America) with above 500 million phone lines (similar to India) and tele density reaching 100% may provide the best insight into an appropriate numbering plan. We have included North America as a single entity as they utilize a common numbering plan and share the numbering resources.

For us to be able to intelligently comment on the paper, we have defined and prioritized the following objectives from the consultation paper:

- **To have sufficient numbers till the year 2060 (next 50 years).** The population of India is projected to be 1.7 billion in 2060 with no growth after that. Taking a tele density of 200%, we will need 3.4 billion numbers at 100% utilization. This is a very high estimate as recent technological trends point out to convergence to a single number eventually. Considering that a large portion of numbers may be in stock or wasted, let us assume a utilization of 70% which is easily possible for a stable, mature market. We will need a total of 4.86 billion numbers at 70% utilization.

- **The numbering plan to be flexible enough to care for all present and future needs of customers including full number portability, value added services etc.**

A 10 digit numbering plan is sufficient to provide 9 billion numbers which is more than enough to meet India's need for the next 50 years and possibly beyond. We feel that the reason for the shortage of numbers is on account of an inefficient numbering plan and inefficient management of resources. We will like to point out here that the discrepancies and insufficiencies in the numbering plan are also resulting in customer dissatisfaction in term of unavailability of full and complete number portability.

Now a point by point reply to your questions in 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?

World Phone Response: Yes, the 10digit numbering scheme to be continued. As the numbers are issued in lots of 10000, 6 digit codes which overlays mobile and cell phones maybe issued to every operator at each instance. This six digit code may not be specific to either an operator; Area; or type of service (**technology neutral**). Given the trend of STD calls being as cheap as local calls and reducing price difference between calls to Mobile and land lines (actually TRAI can mandate that calls to Mobiles or Landline from each other be charged the **same**), there is no need to have separate numbering plans to differentiate the kind of service (VoIP, Mobile, Land line etc.). Even if about 4 billion numbers are reserved for special services, short codes, value added services say, starting with 1, 2, 5 and 8; there will still be 5 billion numbers available for phone users which as we have pointed out in our comments is sufficient till year 2060 and beyond.

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?

World Phone Response: All local/ national numbers must be accessed by dialing '0'. This will result in standardized dialing without the subscribers worrying about whether it is a local or national number. This confusion is already happening given the operator and area specific numbers issued to mobile operators. The subscribers are many times not sure whether to add a '0' or not.

There may not be a requirement to dial '0' for special, VAS and short number services.

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?

World Phone Response: Please see response to Q1 above

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

World Phone Response: Not Applicable. Please see response to Q1 above.

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?

World Phone Response: An integrated service area based approach will have a definite advantage over the current scheme. Disadvantages, if any, will pale in comparison to the advantages to the subscribers including complete portability of numbers within the service area. North America at present follows this example with a 10 digit numbering plan and they are in no hurry to move to an 11 digit numbering plan as sufficient numbers are available. Also there is full portability within the area code including between mobile and land lines. However, this was implemented decades ago when digitization had not entered the telecom arena. We will like TRAI to be more revolutionary in its approach keeping the future needs in mind **which other countries can follow.**

Given the digitization in the telecom industry over the last few years and the rapid growth of internet telephony, the concept of a service area is becoming redundant. A subscriber with a VoIP phone can even now actually move between different service areas and retain his phone number. That is why; we will like to suggest just a 6 digit code which is blind to the service area, operator or type of service. Please also see our response to Q1. This will enable a subscriber to retain his number even if he moves from one service area to another resulting in **true portability** and a **universal numbering plan.**

This can be implemented almost immediately by overlaying on the current numbering scheme and complete transition achieved within 6 months as subscribers become more comfortable in using the new numbering plan. If sufficient numbering resources are not available to achieve this, it may even be worthwhile to move to an 11 digit numbering plan which will overlay the current numbering scheme so as to ensure least level of discomfort to existing customers.

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

World Phone Response: Please see our response to Q1 and Q5.

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?

World Phone Response: A numbering return must be filed to ensure that the operator has used over 80% of the numbers before new numbers are allocated.

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

World Phone Response: It is more important to ensure that the numbers are used and not just stocked or hoarded by Service Providers. This can be better served by strict compliance regarding filing of numbering returns and large penalties for non-filing or delayed filing of such returns. There can also be stiff monetary penalties for misleading returns and for hoarding numbers.

Actually, pricing the numbers may result in hoarding and shortage of numbers as those who can afford may just buy the numbers and hoard them to stifle competition.

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

World Phone Response: Please see our response to Q8. Though we do not favor pricing the numbering resource, if implemented should be for all resources in order to provide a fair and level playing field to all.

Thanks again for providing us this opportunity to respond to the consultation paper.

Sincerely,

For World Phone Internet Services Pvt. Ltd.


Puneet Jhingan
Sr. Vice President

