

1180/TRAI-G/ISPAI/10

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Sub : TRAI Consultation Paper on Efficient Utilization of Number Resources

Dear Sir,

This has reference to the consultation paper on 'Efficient Utilization of Numbering Resources' and the comments received on it from various stakeholders. We would like to point out that there appears to be an inadvertent omission of the fact that DOT has permitted the UASL and CMSP to offer Unrestricted Internet Telephony Service. To be able to implement the same, clarity is required on utilization of the numbering schemes. TRAI in its recommendations to the government on "Issues related to Internet Telephony dated 18th August 2008 (extract attached for ready reference) has given clear recommendations of how Internet Telephony is to be implemented in the country. The enclosed recommendations clearly indicate that specific resources out of an 11 digit numbering scheme may be earmarked for Internet Telephony.

Sir, Net Telephony is reality in many developed and developing countries. Sooner or later it shall be permitted in the country across various service providers.

We would request you to kindly take above facts in view while formulating your recommendations on efficient utilization of numbering resources.

Thanking you,
For Internet Service Providers Association of India

Naresh Ajwani
Secretary

4.3 Numbering (para 3.13.13)

4.3.1 Allocation of E.164 number resources may be permitted to ISPs also for providing Internet telephony.

4.3.2 TEC to conduct the study to assess Internet Telephony number resource requirement. Based on the study, appropriate number blocks may be earmarked for Internet telephony in newly recommended 11 digit numbering plan.

4.3.3 ISPs providing Internet telephony services shall be allocated number resources from the earmarked Internet Telephony number resources in a block of 1000 numbers or it's multiple.

4.3.4 DOT may prescribe charges for E.164 number allocation to ISPs, if any, considering availability of number resources, ISP's business model etc..

4.3.5 UASPs, BSOs & CMSPs shall also be allocated number resources to provide Internet telephony from the identified blocks earmarked for Internet telephony. No fee shall be charged from UASPs, BSOs & CMSPs for allocation of number resources for Internet telephony service. Additional number resources shall be 64 allocated to access service providers, for Internet telephony, only after they submit proof of utilization of 60% allocated numbers.

4.3.6 DOT shall notify the domain name of the respective ENUM domain while allocating number resources for Internet telephony to ISPs, UASLs, CMTS and BSOs. Based on this information, all NLD facilitating Internet telephony shall update their records within 10 working days.