



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/ 9463

Dated: 28-11-2019

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

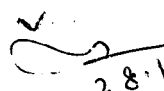
Sir,

**Subject:** BSNL's counter 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" and comments of various stakeholder on the aforementioned consultation paper including BSNL. After examining the comments of stakeholders BSNL's submission for counter comments of the consultation paper is as below.

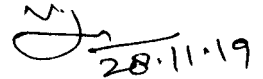
**BSNL's counter comment to the submission of M/s Airtel, M/s RJIL, and M/s Vodafone Idea to TRAI's Consultation paper on "developing a unified numbering plan for fixed line and mobile services"**

1. It has been observed that M/s Reliance JIO has favored for a unified numbering plan for fixed line and mobile services. Special reference is made to comments of M/s reliance Jio wherein the whole SDCA numbering scheme has been questioned and branded archaic and cumbersome. BSNL does not agree to such misnomers. Since M/s Reliance Jio is a major market player in Wireless services, it has suggested that the Mobile numbers should remain unaltered; however, it has not shown the same respect for Wireline. BSNL understands that the option suggested by M/s RJIO will definitely kill all the customer base of existing Wireline TSPs and facilitate M/s RJIO easy penetration in Wireline service at the cost of other existing TSPs. **The aim of Consultation Paper issued by TRAI is to generate substantial numbering resources and the focus ought to be only on the subject.** BSNL strongly oppose the observation of RJio and request the Authority to continue with existing SDCA based numbering scheme for wireline.
2. It has been observed that though M/s Airtel and M/s Vodafone Idea has opposed unified numbering plan for fixed line and mobile services, they have effectively proposed for '0'+ STD code for accessing intra-SDCA fixed line from fixed line. BSNL strongly opposes this proposal. While all Mobile handsets have easy facility to store thousands of numbers by customer name and automatic dialing facility is there; in general no such facility exists in Wireline handsets. A Wireline customer has to dial all the digits manually. Short 5 to 8 digits dialing is customer friendly and convenient. It is always easy to remember and recall than a 10-11 digit number. Also, dialing only 5 to 8 digits for accessing local numbers is an important USP of Wireline

  
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connection. Any attempt to change habits of customers anywhere will be detrimental – more so to the existing large Wireline customer base of BSNL.

3. BSNL has already given many reasons why unified numbering plan for fixed line and mobile services is not all necessary and required as there is abundant mobile numbering resources available in the market to fulfill the requirement telecom industry for more than next 20 years. In this regard, BSNL would only suggest that any stakeholder advocating for unified numbering plan must understand the intricacy involved in Wireline business and requirement of having a distinct numbering plan for Wireline – security and emergency issues apart, its usefulness by way of geographical and location significance and customer ease cannot be overlooked at any cost – especially in low revenue generating areas such as small towns, rural areas and remote areas where the customers has many reservations with regard to their dialing habits and cost. Here special reference may be made to China which can be best compared with India in terms of ethnicity, economy, population and telephone density – it has not implemented the unified numbering plan for fixed line and mobile services, and has 10 digits numbering for Wireline and 11 digits for Wireless Mobile.



(Ved Prakash Verma)  
AGM (Regulation-II)