

# **Syniverse Response to Consultation Paper on Revision of National Numbering Plan**

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## 1 Introduction

Syniverse thanks the Telecom Regulatory Authority of India (“TRAI” or “the Authority”) for the opportunity to make known Syniverse’s comments on the Authority’s consultation paper on the Revision of the National Numbering Plan (“the Consultation Paper”) published 06.06.2024.

Our comments do not address every single issue raised by TRAI in the Consultation Paper, but we do address the salient points related to Syniverse and our role in Mobile Number Portability (“MNP”) especially but also in other key aspects. As such, in our response, if Syniverse has no opinion or comment on a consultation question we simply marked it as “No comment” following the description of the Issue for Consultation.

We look forward to continuing to work with the Authority and the Telecommunication Service Providers (“TSPs”) in India for the betterment of the MNP and other key processes where Syniverse plays a part.

## 2 Issues for Consultation

**2.1 Q1. Are there any TI resource shortages envisaged in the near future due to the presently adopted SDCA based fixed line Telecom Identifier scheme? Is there a need to revise the criterion prescribed by DoT for allocation of additional Telecommunication Identifier (TI) resources for fixed line access services? Please provide answers with detailed justification..**

**Syniverse Response:** No comment.

**2.2 Q2. How can the (a) Spare SDCA codes and (b) Unused sub-levels out of the levels allocated to TSPs be best utilized to cater for future requirements of TIs for fixed-line access services? Please provide a detailed answer.**

**Syniverse Response:** No comment.

**2.3 Q3. As is the case currently with mobile numbers, in order to ensure availability of TIs for fixed lines, should 10-digit closed numbering scheme be made applicable to fixed line also? Please provide answers with detailed justification**

**Syniverse Response:** Using the same 10-digit scheme for fixed as used for mobile numbers today would enable the current MNP infrastructure to apply to fixed operators so that fixed subscribers could also enjoy MNP without significant changes to the MNPSF or current porting processes.

**2.4 Q4. Will migrating to LDCA based TI scheme address the constraints in SDCA based fixed line TIs? Please provide answers with detailed justification.**

**Syniverse Response:** No comment

- 2.5 Q5. What are the other possible options, if any, to address the currently envisaged constraints in TI resources for fixed lines in an efficient manner? Please provide your answers with a detailed proposition (including technical challenges, changes required in handling, routing, interconnection and termination of emergency services and other essential calls and associated cost/benefit analysis). Supportive documents, if any, may also be provided to justify your answer.

**Syniverse Response:** No comment.

- 2.6 Q6. Is bulk allocation of TI by few TSPs for providing SIP and PRI based services likely to create TI resources shortage in near future? If yes, what are the suggested means to address this issue? Please, provide your answer with supportive data.

**Syniverse Response:** No comment

- 2.7 Q7. Is there a need to introduce appropriate definition for 'inactive connection' for fixed-line services and the exact time duration after which, TIs associated with these inactive connections can be put to reuse? Is there also a need to revisit the definition of 'inactive connection' for Mobile services? Please provide your answers with detailed justification and suggested definition.

**Syniverse Response:** No comment

- 2.8 Q8

- (a) (a) Whether charges should be introduced for existing and newly allocated TI resources to ensure their efficient utilization? If yes, what should be the charging mechanism and applicable charges? Please provide detailed justification along with supportive documents, if any.
- (b) (b) Should a financial disincentive be imposed upon TSPs for retaining X% or more of the allocated TIs remaining as unutilized beyond a certain timeframe? If yes, please specify the X% with suggested disincentive mechanism and retention timeframe with detailed justification?

**Syniverse Response:** No comment

- 2.9 Q9. What is the minimum contiguous range of unutilized TIs which the TSPs should be allowed to surrender for mobile and fixed-line services.

**Syniverse Response:** No comment

- 2.10 Are there any constraints envisaged in TI resources and its allocation for Machine-to-Machine (M2M) services? If yes, what changes should be incorporated to cater for its future requirements? Do support your answer with detailed justification.

**Syniverse Response:** No comment

2.11 Q11. What constraints/issues if any, are currently envisaged in the procedure being followed for allocation of Level-1 short codes by DoT? Should the level-1 short codes be reserved for government entities only? Will allocation of level-1 short codes on chargeable basis solve the issues identified in aforementioned question? What are the other possible suggestions for judicious allocation and effective utilization of level '1' numbering resources? Please support your answer with detailed justification.

**Syniverse Response:** No comment

2.12 Q12. What are the global best practices being followed for judicious allocation and effective utilization of short codes (akin to Level-1 short codes in India)?

**Syniverse Response:** No comment

2.13 Q13. Are there any constraints/challenges envisaged with regards allocation and utilization of TI resources for Service Control Point (SCP) codes and Signaling Point (SP) codes respectively? If yes, what changes should be incorporated to cater to future requirements of the aforesaid codes? Do support your answer with detailed justification.

**Syniverse Response:** No comment

2.14 Q14. What constraints/ challenges are anticipated with regards TI resources for Location Routing Number (LRN) codes to cater for futuristic requirements? What changes, if any, should be incorporated to effectively address its future needs? Do support your answer with detailed justification.

**Syniverse Response:** Using the same 10-digit scheme for fixed as used for mobile numbers today would enable the current MNP infrastructure to apply to fixed operators so that fixed subscribers could also enjoy MNP without significant changes to the MNPS or current porting processes.

2.15 Q15. What constraints/ challenges are anticipated in the allocation of TI resources for Intelligent Network (IN) Services like Free Phone service, Premium services, International Toll-Free Service (ITFS), etc.? What changes, if any, should be incorporated to cater for its future requirements? Do support your answer with detailed justification.

**Syniverse Response:** No comment

2.16 Q16. What constraints are envisaged towards TI resources for MCCMNC codes being used for Captive Non-Public Networks (CNPNS)? What changes, if any, should be incorporated to cater for its future requirements? Do support your answer with detailed justification.

**Syniverse Response:** No comment

2.17 Q17. Apart from the questions posed above, are there any additional issues being experienced by the TSPs regarding the aspects of the National Numbering Plan 2003 and TI resources allocation criteria? If yes, then the same may please be brought out in detailed elaboration with supporting documents.

**Syniverse Response:** No comment

### 3 Other Comments

**Syniverse Response: No other comments.**

## 4 About Syniverse

Syniverse is the world's most connected company. We seamlessly connect the world's networks, devices, and people, so the world can unlock the full power of communications.

Our secure, global technology powers the world's leading carriers, top Forbes Global 2000 companies, and billions of people, devices, and transactions every day. Our engagement platform delivers better, smarter experiences that strengthen relationships between businesses, customers, and employees.

For over 30 years, we have accelerated important advances in communications technology. Today we are an essential driver of the world's adoption of intelligent connectivity, from 5G and CPaaS to IoT and beyond. Find out more [www.syniverse.com](http://www.syniverse.com).