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13 November 2019

Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg,
New Delhi-110002

Kind Attention: Shri U.K. Srivastava, Pr. Advisor (NSL)
Subject: Consultation Paper on "Developing a unified numbering plan for fixed line and mobile services"

Dear Sir,

This is with reference to the consultation paper issued by the Authority on 20 September 2019 on the captioned subject.

We are pleased to submit our comments and views on the Consultation paper on 'Developing a unified numbering plan for fixed line and mobile services.'

We hope our submissions will merit your kind consideration.

Thanking you

Yours faithfully,
For **Vodafone Idea Limited**


Sundeep Kathuria
EVP- Regulatory Affairs (TRAI, Policy & Enterprise)

VII response to TRAI Consultation Paper on Developing a Unified Numbering Plan for Fixed Line and Mobile Services dated 20.09.2019

Summary:

There is still a lot of scope for making more numbering resources available for mobile services, even within the existing 10-digit numbering framework. Hence, the proposal for implementation of integrated/unified numbering plan (by making fixed line numbers of 10 digit length) should be weighed against other available alternatives, in order to arrive at the best alternative that effectively and efficiently results in freeing up of large and contiguous numbers/number series for allocation for mobile services.

We submit an alternative option to the 5 options proposed by the Authority (as Option 6). This option primarily requires a change in the dialing pattern of Fixed line subscribers viz. mandatory prefix of '0+STD code' for Fixed-to-Fixed calling (intra-SDCA) and removal of prefix of '0' for Fixed-to-Mobile and Mobile-to-Mobile calling (intra-circle/inter-circle). Although this option will require adequate customer awareness, it is a neat, efficient and effective option in comparison to the 5 options laid out in the consultation paper, as it does not result in disruption of subscriber numbers, major network/IT overhaul, while making available almost 7 billion numbers for allocation for mobile services that would meet the long-term numbering goals of India.

However, in case the option as proposed by us, is not found feasible by the Authority, we would like to submit that the option of accessing intra-service area as well as inter-service area mobile from fixed line by dialing prefix '0', can be considered for implementation.

Further, the allocation, pricing, and management of numbering resources is being effectively and efficiently managed by the Licensor and we do not see any need for an overhaul in these domains.

Issue-wise response:

Q 1. Whether, the unified numbering scheme should be introduced in India? If yes, please provide the possible ways of implementing it with justification.

A 1. As noted in the Authority's Consultation paper of 20.01.2010, DoT's response dated 21.03.2012 to TRAI's recommendations of 20.08.2010 and this consultation paper dated 20.09.2019, integrated numbering scheme will require changes in the architecture and data bases of the fixed network, re-arrangement of POIs, and changes in routing and billing systems (including inter-operator system, OSS etc). All these changes need to be factored/weighed against the objective of whether this option will effectively and efficiently result in freeing up of large and contiguous numbers/number series for allocation for mobile services. The consultation paper does not indicate the details of the numbering capacity that will be made available if unified numbering scheme is taken forward. Also, there are no details in the consultation paper w.r.t the efforts/changes that will be involved in various network elements, IT systems, and interconnection architecture and charging regime – all these larger aspects need to be first discussed in detail with the TSPs, in order to arrive at a view whether integrated numbering scheme

should be considered or not. This was also noted by the DoT and by the Authority in 2012 where the Authority had mentioned that separate consultation would be undertaken on this matter in detail, which has however, not been undertaken in this consultation.

We are of the view that other alternatives should be explored which could be more effective and efficient in meeting the objective of making more numbers available for mobile services. We delineate our suggestion in this regard, in response to Q2 below. We also delineate some challenges that we foresee, in taking forward unified numbering scheme :

W.r.t the sub-option 1 given in the consultation paper viz. merge the SDCA code with the subscriber number, we anticipate issues in terms of network routing database becoming more cumbersome for configuration, and prone to MNP related errors on account of more splitting required in the numbers/levels.

W.r.t the sub-option 2 given in the consultation paper viz. identification of 1 or two unique codes for each circle and filling up of the remaining digits to make a 10 digit fixed line number (ie. 3rd to 10th digit from SDCA code + subscriber number), this option creates the issue of few very subscriber numbers being available to TSPs. Also, as mentioned by DoT in their response of 21.03.2012 and by the Authority in this consultation paper and its earlier recommendations of 20.08.2010, this option is not supported/recommended as it requires subscriber numbers to be altered substantially for the geographical identification of circle from the numbers.

Q 2. If the answer to the preceding question is in the negative, which of the following options can be tried out? Please provide details and justification considering the advantages and disadvantages.

(i) Vacating the sparingly used fixed line levels '3','5' and '6' for allocation for mobile services

(ii) Accessing intra-service area as well as inter-service area mobile from fixed line by dialing prefix '0'; for generating more numbering resources for mobile services?

(iii) Shifting Data only mobile numbers from 10 digit to 13 digit numbering

(iv) Moving on to 11 digit numbering scheme for mobile and continuing with 10 digit numbering for fixed line services

(v) A combination of some of the above

(vi) Any other option

A 2. We would like to submit the following alternate option (as Option 6), to all the 5 options listed in the question above:

Mandate accessing intra-SDCA fixed line numbers from fixed lines by prefixing 0+STD code and, mandate accessing mobile numbers from fixed lines and mobiles without '0' prefix.

The above option will only require dialing pattern changes from subscriber behavior perspective while resulting in making levels '2', '3', '4', '6', '7', '8', and '9' available for mobile number allocations,

thereby making available 7 billion numbers available for mobile services, which will be even higher than the 4.68 billion mobile numbers requirement anticipated/estimated by the Authority by the year 2050 (which takes into account India's population forecast by the year 2050).

This option will require minimal change in network and minimal impact on subscribers, as all numbers starting with '0' will be considered as fixed line while mobile numbers will continue in existing pattern. There will be no change in the fixed line subscriber's number, in this option.

However, adequate consumer awareness will need to be created, so that subscribers become accustomed to this dialing pattern and do not end up dialing wrongly. Consumers will also need to be made aware that if they dial with 91 or +91 as prefix, they will need to dial '0' before the fixed line number – for eg. +9102223456789 / 009102223456789.

We would also like to submit some challenges that we foresee, in taking forward the Options 1 to 5 listed in the question above :

W.r.t vacating the sparingly used fixed line levels '3', '5' and '6', if partial or in-between sub-levels/numbers are freed (ie. non-contiguous), then there will be routing database complexities at network end, since networks of TSPs will need to resolve those many 1st few digits to decide the routing of calls to these numbers.

W.r.t accessing intra-service area as well as inter-service area mobile from fixed line by dialing prefix '0', all the sub-levels which are presently allocated for SDCA codes will be unavailable for mobile subscribers and hence significantly additional numbering resources would not become available.

W.r.t shifting 'data only' mobile numbers from 10 digit to 13 digit numbering, customer issues like customer willingness to remain on such data-only plans, international roaming functionality, bill payment functionality w.r.t 13 digits etc. will arise. Also, at IT level, such a migration will involve complex provisioning flow changes even after migration, thus making this option unviable. In any case, very few numbers will be made available for allocation to mobile services, under this option.

W.r.t moving on to 11 digit numbering scheme for mobile, the Authority has already noted in Paras 2.43 and 2.44 of this consultation paper that not only would this require modification in all fixed and mobile system software, it would cause inconvenience to consumers and adversely impact different sectors of the economy especially the digital economy where the mobile number is associated with the digital identity of individuals. We believe that there is still a lot of scope for making more numbering resources available for mobile, even within the existing 10-digit numbering framework as delineated by us as alternative option (i.e option 6) above. With some minor adjustments, the growth requirement of mobile subscribers can be met adequately and efficiently within the existing frame work. There is thus no need or justification to move to an 11-digit numbering plan.

However, in case the option as proposed by us, is not found feasible by the Authority, we would like to submit that the option of accessing intra-service area as well as inter-service area mobile from fixed line by dialing prefix '0', can be considered for implementation. It may please be noted that in both these options (ie. our proposed option and the above-mentioned option), customer awareness will be need to be done at domestic and international level.

Q 3. Do the present criteria of utilization for allocation of numbers ensure efficient utilization of the numbering resources or would you suggest some other criteria?

A 3. Yes, the present criteria of utilization for allocation of numbers ensures efficient utilization of the numbering resources.

Q 4. Do you feel that sparingly used MSC codes may be withdrawn and reallocated to another TSP whose subscriber base is growing?

A 4. No, this should not be done if the TSPs have already provisioned the MSC codes in their systems and released the SIM cards in the market with the allotted MSC codes. The unused SIM cards would be rendered unusable if the allotted MSC codes are suddenly withdrawn.

Q 5. Do you feel that there is a need to file an "Annual Return on Numbering Resource Utilization" to the numbering plan administrator for monitoring and ensuring efficient utilization of number?

A 5. No, as the TSPs submit detailed information which is subjected to TERM Cell checks/audits, as part of their application for obtaining additional numbering resources from DoT. Imposing this additional requirement would not be of much use. Also, in today's competitive scenario, it is difficult to predict/forecast a demand for numbering resources for the period as envisaged by the Authority.

Q 6. What are your views on the pricing of numbering resources? If pricing is implemented should it be for all resources held by the service provider or only for future allocations?

A 6. We do not agree with Authority's proposal of pricing of numbering resources already held by TSPs and also for future allocations of numbering resources, as there is already a stringent criteria for allocation of numbering resources to ensure efficient utilization of numbering resources.

Q 7. Do you feel that an automated allocation of numbering resources using number management system software is necessary to speed up the process of allocation and collecting returns in an efficient and transparent manner? Do you feel that this work may be assigned to an independent body by the licensor? Please provide details

A 7. Currently, all TSPs manage their numbering resources with the help of number management databases, in order to ensure efficient and effective management. We are not clear what would be the incremental benefit accruing to TSPs if an automated allocation process is created, since DoT tightly manages the number allocation process at present. Hence, any plans for an automated number allocation process may require wider deliberation in consultation with the TSPs.

Q 8. Do you agree that a revised and new National Numbering Plan and a consolidated list of short code allocations should be issued? If so, what should be the periodicity?

A 8. Since NNP 2003 has undergone many revisions between 2003 till date, it will be ideal to have an updated NNP issued for ease of reference of all stakeholders. Similarly, it would be useful to have an updated list of short codes (which are in use by agencies or required by them), for ease of reference of all stakeholders.

Q9. Any other related issue

A9. None

New Delhi

13th November, 2019