

19th February 2010

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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.