

AUSPI/12/2010/50

15th March, 2010

Dr. J S Sarma,
Chairman,
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawaharlal Nehru Marg,
New Delhi.

Sub: Counter Comments on the TRAI Consultation Paper No. 02/2010 regarding Efficient Utilization of Numbering Resources

Dear Sir,

We have submitted our comments to the consultation paper on 'Efficient Utilization of Numbering Resources'. We are now submitting our counter comments reiterating our views with reference to various comments of stake holders. It is essential that the numbering plan be such that it avoids inconvenience to the customers. In view of that, it should be the objective that the numbers already allocated and being used by the customers should not be disturbed.

The suggested solution for prefixing '0' for intra service dialing from fixed to mobile is a good short term measure as this does not require any major change in the numbering scheme of subscriber.

In view of the fact, we reiterate our response to issue 2 as follows:

"It is evident that there should be a transition path to the adoption of a new numbering scheme for a long term aspect. To avoid inconvenience to the customers vis-à-vis the need to have adequate numbers needs to be kept in mind while doing this review of numbering resources. Therefore, the suggestion of the Authority of accessing mobile numbers for intra services calls from fixed line by dialing '0' has significant advantages and will accommodate the needs of the customers for the time period upto April, 2013 as well as provide the necessary transition path to the full adoption of 11 digit numbering scheme in the long run.

Advantages

- The changes are implemented only in dialing pattern.
- This allows all unused STD codes to be used for mobile series.
- Easy to convey the change and to implement this for the consumer. "

3) The existing fixed line services are working on NSN ten digits on various levels like 2, 3, 4, 5 & 6. Continuance of fixed line with NSN ten digit numbers in these levels is in the interest of the consumers as well as the country to take into account the development of broadband.

4) The suggestions as proposed by the Authority for accessing mobile service for intra service from fixed line by dialing '0' will take care of the objectives for quite some time and in the process, the levels used for fixed line i.e. 2,3,4,5 & 6 need not be disturbed.

5) With the introduction of proposed scheme of '0' prefixing to mobile numbers for a call from fixed line will solve the issue of no number change and in the process, would provide sufficient levels for taking care of the growth of wireless services. However, 10 digit NSN in fixed line (i.e. fixed line number with STD code) is recommended as it will take care of the growth of the fixed line subscribers.

In view of that, it is suggested that :

a) Fixed line numbering of 10 digit including STD code with levels 2,3,4,5 & 6 be continued which will work without any technical hitches, and

b) Prefixing '0' for dialing from fixed to mobile for intra service calls

Thanking you,

Yours faithfully,

**S.C.KHANNA
SECRETARY GENERAL**

Encl: As above

- 1) Shri R. Ashok, Member, TRAI
- 2) Shri R.K.Arnold, Secretary, TRAI
- 3) Shri Lav Gupta, Principal Advisor (I & FN), TRAI
- 4) Shri Arvind Kumar, Joint Advisor (FN),