

# Response to TRAI's "Consultation Paper on Revision of National Numbering Plan"

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## Reference:

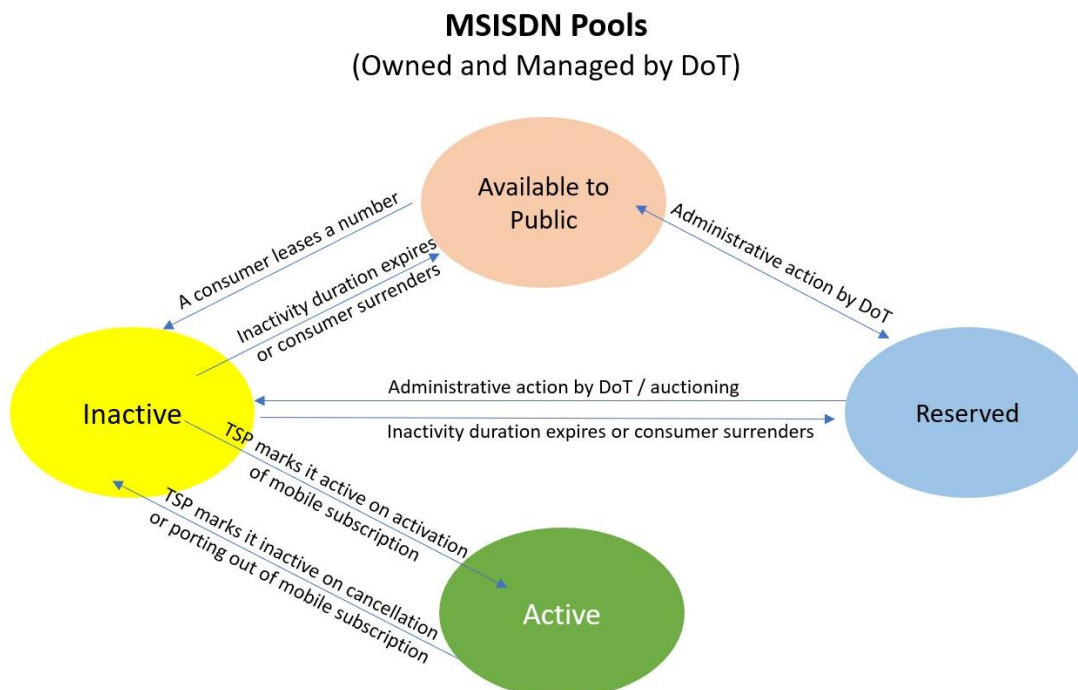
This document is in response to TRAI's "Consultation Paper on Revision of National Numbering Plan" dated 06th June 2024.

## Summary:

DoT should be the sole custodian of the MSISDNs which are public property. DoT should directly lease MSISDNs to consumers (individuals or business). The terms and conditions of allocation/deallocation, etc. should be solely determined by DoT. TSPs should only associate a mobile subscription (IMSI/SIM) with an allocated MSISDN.

## **DoT should maintain MSISDNs in various pools:**

1. **Available:** MSISDNs which are available to the public and can be leased to them through a quick, simple online process.
2. **Reserved:** MSISDNs not available to the public. These may include premium numbers and other MSISDNs which are made available to the public at DoT's discretion.
3. **Inactive:** MSISDNs assigned to consumers, but without an associated TSP.
4. **Active:** MSISDNs already assigned to consumers and a TSP is associated with them.



## Description

### Movement of an MSISDN amongst various pools:

**Allocation:** Any consumer desirous of getting a new mobile connection should first get an MSISDN from DoT. DoT system allocates an MSISDN from the “Available” pool. A consumer should not be allocated additional MSISDNs as long as there are inactive MSISDNs allocated to that consumer. After allocation, the MSISDN is moved from “Available” pool to the “Inactive” pool.

Once the MSISDN has been allocated the consumer approaches a TSP and gets a mobile subscription. TSP verifies that the given MSISDN belongs to the applicant. Once verified, TSP provides the subscription/SIM to the applicant and then moves the given MSISDN from “Inactive” to “Active” pool in the DoT database. TSP also associates itself with the given MSISDN.

**Subscription Cancellation:** If a consumer cancels the mobile subscription from a TSP (and does not perform MNP) then TSP moves the given MSISDN from “Active” to “Inactive” pool in the DoT database.

**Premium Numbers:** DoT may from time to time auction the premium MSISDNs for say 4-5 years. Such MSISDNs can also be assigned to constitutional posts. The DoT on behalf of the exchequer should benefit from this. Thus allocated, the MSISDNs move from “Reserved” pool to “Inactive” pool.

**Expiry of “Inactive duration”:** An MSISDN should be allowed to remain inactive for a pre-defined maximum duration (say few months/weeks as decided by DoT) after which it goes into its original pool either “Available” or “Reserved”. Duration could be different for “Premium/Reserved” MSISDNs.

**Surrender:** A consumer should be able to surrender the allocated MSISDN. The MSISDN should be in Inactive pool before being surrendered. So the consumer should first get the subscription from the TSP cancelled. On cancellation the TSP moves the MSISDN from “Active” to “Inactive” pool in the DoT database. The consumer (or the TSP on behalf of the consumer) then approaches the DoT to surrender the MSISDN. DoT system moves the MSISDN from “Inactive” to “Available” pool. However, a cooling off period can be introduced to reduce number of calls intended for the old consumer from reaching the new consumer.

### Charges / Fees:

**One time allocation fee:** DoT may charge a fee when a consumer requests for more than N (to be decided by DoT) MSISDNs. This fee can be different for individuals and businesses. This should reduce the number of inactive MSISDNs. DoT may also place a limit on the number of MSISDNs which can be taken by consumers.

**Annual fee:** MSISDNs which remain in the Inactive pool for more than a predefined duration may be charged an annual fee.

### Miscellaneous Aspects:

**MNP:** When the MSISDN undergoes MNP, the new TSP should update the DoT database associating its name with the given MSISDN. The MSISDN remains in the Active pool.

**Transfer of MSISDN:** The MSISDNs should be transferrable in certain scenarios like inheritance from parents to children, takeover of businesses, etc. Otherwise, consumers should not be allowed to transfer the MSISDNs.

**Security aspects:** Since the MSISDN is being assigned by DoT, the security verification, etc. should be the responsibility of the DoT and not private entities like TSPs. One solution can be Aadhar based verification.

## Question and Answers

**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.**

Answer to Q7: For MSISDNs only: As per the above proposal for MSISDNs, the inactive MSISDN would be the one which is not associated with any TSP. If DoT determines that the number of inactive MSISDNs is increasing and the number of available MSISDNs is reducing, then it can reduce the "inactive duration" on its own, increasing the number of available MSISDNs.

As per the above proposal, DoT manages the inactive, reserved and available pool of MSISDNs and thus knows the real time status of each. This allows DoT to take and implement decisions on its own.

**Q8: (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) 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?**

Answer to Q 8a: For the MSISDNs only: As per the above proposal, DoT should charge an allocation fee beyond few MSISDNs to the same consumer and also an annual fee for MSISDNs which remain inactive beyond a pre-defined duration. In case of an inactive MSISDN, if the consumer wishes to retain the number, he/she can pay the annual fee directly to the DoT or else surrender the inactive MSISDN. Non-payment of annual fee results in transfer of MSISDN from Inactive to Available pool (after a cooling off period).

DoT being completely in control of the entire life cycle of the MSISDN, will be able to ensure the optimum utilization of the MSISDN resource and take decisions accordingly. As per this proposal, DoT will have in real time all the information regarding the utilization of MSISDNs, number of inactive users, users with multiple connections, etc. Availability of this real time information will empower DoT to take decisions accordingly.

Answer to Q 8b: For the MSISDNs only: As per the above proposal, this scenario described in the Question 8b will not arise.

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

Answer to Q9: For the MSISDNs only: As per the above proposal, this scenario described in the Question 9 will not arise. DoT will have a direct relationship with the end customer.

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