



**DG/COAI/2024/326**  
**August 15, 2024**

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World Trade Centre, Nauroji Nagar,  
New Delhi: 110029.

**Subject: COAI Counter Comments to the Consultation Paper on Revision of National Numbering Plan**

Dear Sir,

1. This is with reference to the TRAI Consultation Paper on “Revision of National Numbering Plan” released on June 06, 2024.
2. In this regard, please find enclosed COAI Counter Comments to the said Consultation Paper.

Looking forward to your kind consideration and esteemed support on the above.

Thanking you,

Sincere regards,

Digitally signed  
by Lt. Gen Dr.  
SP Kochhar  
Date:  
2024.08.15  
15:17:17 +05'30'

**Lt. Gen. Dr. S.P. Kochhar, AVSM\*\*, SM, VSM, ADC, KIGA**  
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## COAI Counter Comments/Additional Comments to the Consultation Paper on “Revision of National Numbering Plan”

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We thank the Authority for providing us with the opportunity to share the Counter Comments to the Consultation paper on Revision of National Numbering Plan.

### We would like to reiterate our key submissions, and they are as follows:

1. SDCA-based numbering scheme should be transitioned to a 10-digit closed License Service Area (LSA)-based numbering scheme prefixed with ‘0’.
2. There is no need to migrate to an LDCA based scheme. Once transitioned to an LSA-based, both the SDCA as well as LDCA based constraints would get addressed.
3. New LSA-based numbering series to be used for new connections and under this option the fixed-line numbering scheme to be a 10-digit closed numbering scheme.
4. **It should be mandatory for all TSPs (including BSNL) to establish interconnection at one location at the LSA level for exchange of voice traffic, within prescribed timelines, without any additional carriage charges for intra-LSA calls as well as facilitating surrender of existing SDCA/LDCA level POIs without any additional charge.**
5. There is no need to introduce definition for ‘inactive connection’ for fixed line services. The dynamics and usage patterns of fixed line services differ significantly from those of mobile services. Further, there is also no need to revise the definition of ‘inactive connection’ in case of mobile services.
6. Charges should not be introduced for existing and newly allocated TI resources. Telecom Industry already have multiple levies and any additional charges for the numbers already held by TSPs and for future allocations will be an additional burden on the operators.

### **Our response to some of the comments made by the stakeholders in their response to the Consultation Paper are as below:**

1. One of the stakeholders have stated that there is no shortage that is envisaged in near future and that there is no need to revise the criterion.
2. We disagree with this suggestion, and in this regard, we would like to submit that the TI resource shortage is not only expected in near future but also already existing in some of the SDCAs/LDCAs which is also highlighted in TRAI CP. The moot point is also that the present SDCA based number allocation for fixedline series is an inefficient



approach that constraints the TSPs from making best use of available resource as per market needs. Hence, we believe that the SDCA based numbering scheme for fixed line services should be reviewed.

3. It is also crucial to recognise that for a long-term and sustainable objective to be achieved, the SDCA based numbering scheme must transition to an LSA-based numbering scheme. This LSA based numbering scheme will significantly enhance the efficient utilization of the numbering resources while addressing the TI constraint for fixed line for TSPs.
4. In order to ensure significantly less customer inconvenience and reduce network impact, the existing Subscriber Numbers as well as the SDCA codes already allocated be allowed to continue for existing customers, while the new LSA-based numbering series is used for new connections.
5. Under this option the fixed-line numbering scheme will be a 10-digit closed numbering scheme i.e. the customers will have to dial all the 10 digits prefixed with a Zero ('0'+ SDCA/STD code + Subscriber Number) even from within the same SDCA/LSA. Further there will be important considerations to be ensured:
  - a. It should be mandatory for all TSPs (including BSNL) to establish interconnection at one location in an LSA level for exchange of voice traffic.
  - b. The calls destined for emergency services and originated from fixed line numbers (irrespective of SDCA/LSA based numbering scheme) should be routed at ERSS helpdesk at LSA level.
  - c. There would have to be a transition plan from existing SDCA based numbering scheme to LSA based numbering scheme.
6. **It is important to emphasize that the proposed solution is contingent upon the involvement of BSNL. For the solution to be effective, it is imperative that BSNL's interconnection at a single location within each Licensed Service Area (LSA) is made mandatory for fixed line services (i.e. fixed to fixed and mobile to fixed), without any additional cost of carriage for intra-LSA traffic.** This interconnection is a critical component of the solution, ensuring seamless integration and functionality across the network. Therefore, the implementation of this requirement should be enforced rigorously to guarantee compliance. By mandating BSNL's participation and interconnection at the LSA level, through suitable conditions in revised NNP, license agreement as well as TRAI Regulations, the solution can achieve its intended objectives, leading to improved network performance and service delivery.

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