Shri U.K. Srivastava
Principal Advisor
Network, Spectrum & Licensing
Telecom Regulatory Authority of India
New Delhi

Dear Shri Srivastava,

This has the reference to the Consultation Paper dated 20th September 2019 on developing a unified numbering plan for fixed and mobile services.

Our key comments are:

1. We must go in for unified numbering scheme at its earliest.
2. We must introduce prefixing '0' for dialing mobile numbers from fixed lines. There is no reason for not implementing this long due TRAI recommendation.
3. There are only 30 million fixed lines; which will need to be programmed for prefixing '0' before dialing a mobile number.
4. All unused levels allotted to fixed lines operation must be withdrawn to create more levels for mobile service which is the growth area.
5. Should fixed lines grow, that growth would be taken care in the unified numbering scenario.

Please find attached our Counter comments both in Word and PDF formats. We request authority to take our suggestions into consideration while making the final recommendations.

Best regards.

Yours sincerely,

B.K. Syngal
Senior Principal

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**<u>Dua Consulting Response to the TRAI Consultation Paper on "Developing a
Unified Numbering Plan for Fixed Line and Mobile Services"</u>**

Dua Consulting has reviewed the comments made by the service providers to the present
Consultation Paper and would like to make counter comments as follows:

Issue 1: <u>Whether, the unified numbering scheme should be introduced in India? If yes,
please provide possible ways of implementing it with justification.</u>

Dua Consulting Response: In our opinion unified numbering scheme will be a long term
solution to the numbering resource crunch. It is the least disruptive form of effectively
creating the most numbers in a cost effective manner. We support the comments raised by
Reliance Jio and Tata.

The levels of '2', '3','4', '5', and '6' are sparingly used for the fixed line services and we
believe these levels should be freed to create the unified numbering. Such an approach
takes care of the growth of fixed lines as well as mobile services.

Mode of Implementation

- Have a uniform 10 digit number for all fixed lines and mobile services.
- It is suggested to then use the numbers from '2' to '9' for both mobile as well
  as fixed line services while reserving the number '1' for emergency and other
  critical government services.
- As a uniform standard practice, '0' would be added as prefix to all mobile as
  well as fixed line services, thus making it a 11 digit numbering, which is, '0' +
  the 10 digit subscriber number. In any case all numbers including mobile has
  ten digits without '0' but including city, SDCP codes etc.
- This solution will shift all fixed line numbers to 10 digit numbers without
  much impact on the numbers and thus will also provide a clear identifier for
  these numbers.
- The solution, wherein mobile numbers remain unchanged and the fixed line
  numbers are adjusted in a non-disruptive manner under the unified
  numbering plan will free up the locked inventory and increase the overall
  number series to 6 Billion within the current 10 digit numbering scheme.
- Sub-levels can be identified for each area – for the mobiles as well for the
  fixed line.
- We would also like to take this opportunity and suggest that a detailed
  country-wide data analysis should be undertaken to assess the telecom
  density in each region. Basis this, block of numbers and sub levels should be
  handed over to each state / region.

Issue 2: <u>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.</u>

     i. <u>Vacating the sparingly used fixed line levels '3', '5' and '6' for allocation of mobile services.</u>
     ii. <u>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.</u>
     iii. <u>Shifting data only mobile numbers from 10 digits to 13 digit numbering.</u>
     iv. <u>Moving onto 11 digits numbering scheme for mobile and continuing with 10 digit numbering for fixed line services.</u>
     v. <u>A combination of some of the above.</u>
     vi. <u>Any other option.</u>

Dua Consulting Response: Does not arise as we attest to the solution of introducing unified numbering scheme.

However, we take this opportunity to address certain comments presented, particularly by Telecom PSUs which wrongly points to the disruption that shall be caused by prefixing '0' to all mobile numbers. There are only 30 million fixed line users. As on date, all inter-circle calls made to mobiles from fixed lines are done by prefixing a '0'. If this is the present practice, we believe extending the practice to all mobile services and fixed lines will not be a major disruption and the said telecom service providers seem to be misleading the authorities on this point. The call answer pulse is function of the exchange sending a call answer signal.

We also take this opportunity to highlight that, in the present time, there are three ways to dial a mobile number from a mobile in the inter-circle scenario – by just dialing the subscriber number; by prefixing '0'; and by prefixing '+91". In the light of this, for the telecom service a provider to claim that prefixing '0' for all numbers is a complex change is highly misleading. It should be possible to prefix a '0' for a dialing a mobile number when making intra-circle calls. Prefixing '0' is practiced in fixed to fixed calls within NCR which is intra, why should it not be prefixed for mobiles from fixed lines?

Finally, we strongly deplore the attempt of telecom PSUs to hold on to '2' prefix citing legacy and identity arguments. We believe these arguments are completely devoid of merit and the administrators of the said service providers have greater issues which warrant greater attention as against holding onto a numbering level. The arguments presented by the said telecom service providers of level '2' being the "USP" of these providers are absolutely unclear and misplaced.

Issue 3: <u>Do the present criteria of utilization for allocation of numbers ensure efficient utilization of the numbering resources or would you suggest some other criteria?</u>

Dua Consulting Response: The present criterion of numbering restricts the possibility of available numbering resources and does not fulfill the requirement of ample numbers adequate to meet the increasing demand for numbers. TRAI could consider some other additional resource utilization options such as data analysis, sequential block assignment requirements and leveraging faster number portability clearances.

Issue 4: <u>Do you feel that sparingly used MSC codes may be withdrawn and reallocated to another TSP whose subscriber base is growing?</u>

Dua Consulting Response: With the advent of number portability, the codes issued to each telecom service provider should be relaxed, and the MSC codes which were allotted to telecom companies which are not in operation may be allotted to other telecom service providers. Another issue that such a reallocation will address is the entry barriers, service providers create for their competitors by hoarding blocks of unused numbers.

Issue 5: <u>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?</u>

Dua Consulting Response: We support with the comments presented to this present question emphasizing the need to have an Annual Return in place. The Consultation Paper stresses the importance of numbering as a resource and its scarcity, and the need to utilize it efficiently. We agree that the numbering should not be a tool in service provider's strategy. Constant monitoring and periodic audits by TRAI can ensure effective utilization and prevent possible misuse.

Issue 6: <u>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?</u>

Dua Consulting Response: The government could consider the option of imposing a modest charge on a block of numbers. This could be an annual charge on a block of numbers. However, the imposition should be done post a thorough calculated plan in order to avoid passing of these charges onto the customers by the TSPs. The price should be considered to have the desired optimal effect in order to ensure that TSPs purchase the numbering resource in a limited manner as per requirement leaving the scope for new entrants in the market. Annual charge on a block of numbers will ensure that numbering sub-levels are not hoarded by a TSP and is purchased only on need basis.

Issue 7: <u>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.</u>

Dua Consulting Response: The mechanism for allocation of numbers could be done through an automated process that ensures efficient allocation of the numbering.

However, we do not agree to some of the comments presented which provide for an independent body to carry out this function. A separate division within TRAI or DoT can be equipped to carry out the task. This will ensure that there are no multi regulatory bodies with fragmented and silo based operations.

Issue 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?

Dua Consulting Response: While a revised National Numbering Plan is due in light of the current numbering crunch, we would like to emphasize here on the need to have a lasting solution which eradicates the need to revise the plan every few years. Perhaps the Indian authorities can take a cue from some territories which devised a lasting numbering scheme which aided in the growth without being service specific.

Issue 9: Any other related issue.

Dua Consulting Response: We would like to reiterate the need to focus on a long term number crunch solution and not allow frivolous concerns of certain telecom service providers who are citing short term disruptions to derail a lasting solution. A myopic approach initiated to tide over crisis by way of short term solutions is responsible for killing the growth of the telecom industry.

The subscriber base of the telecommunications market in India is the second largest in the world. As of August, 2019 India boasts of a total of 1191.81 Million telephone subscribers. By its own admission, TRAI believes that India would need approximately 4.68 Billion numbers as on 2050 to adequately cater the estimated subscriber market.

With this as background, there is a dire need to focus on long term numbering solution - such as unified numbering system - and not selected hybrid models which would free up few hundred millions for the time being. A decade down the line, this would again pose the threat of a numbering crunch. Numbers is a resource and a scarce resource currently and warrants to be treated as such. The time is ripe to take a detailed stock of the situation, free up the numbers, and allocate them basis population density either state-wise or zonal wise.