



**MNP INTERCONNECTION TELECOM SOLUTIONS INDIA PVT. LTD.  
(MITS)**

Counter comments for the Responses to  
Consultation paper dated June 06, 2024  
on  
Revision of National Numbering Plan

## **COUNTER COMMENTS FROM MITS**

MITS thanks TRAI for this opportunity to provide our counter comments to the response published for the important Consultation Paper that talks about Revision of National Numbering Plan. MITS have reviewed the various public responses/comments received by TRAI and would like to clarify and provide our counter responses/comments to the various points raised by the operators/associations. Please find the below response for your ready reference:

1. MITS is in complete agreement with the suggestion from various stakeholders to keep a Unified Numbering Scheme which is to have 10 digits for both fixed and mobile numbers. This approach not only seems to be the easiest way forward but also is consistent in terms of configuration with the existing system / infrastructure of operators and MNPSPs.
2. The suggestion to implement fixed number portability and adopt All Call Query based calling for all fixed numbers is also one of the most simplified way of implementation. This approach has worked successfully for the last 12 years for mobile numbers which form more than 95 percent of total telecom consumers. With a tremendous growth potential in the fixed number segment, introduction of the fixed number portability as an add on service along with existing MNP service will help introduce competition amongst service providers to provide highest quality services at affordable rates which in turn will be beneficial for the end subscriber.
3. With regards to TI resources for Location Routing Number (LRN), MITS agrees that currently there is no constraint and also as mentioned by TRAI in the consultation paper, enough spare LRNs are available to be allocated to TSPs in future as needed. Furthermore, any LRNs from the surrendered TSPs should also be re used in future for better and efficient utilization of Telecommunication resources.
4. MITS will be happy to engage with the authorities / operators / associations to brainstorm and further suggest on the ideas mentioned by stakeholders with respect to Toll-free porting, fixed number portability and IN portability.