



## **Counter Comments**

**On**

**Responses to the TRAI's consultation paper on Efficient  
Utilisation of Numbering Resources**

Reliance Communications had submitted its comments to the Authority on the consultation paper “Efficient utilisation of Numbering Resources” The comments submitted on this consultation paper by other stakeholders have been studied by us. We are concerned by the fact that the leaving aside a few responses, the majority of stake holders have given comments with a very short term perspective ignoring the fact that other technological advancements will also require Numbering resources. The solutions proposed by us are based on short term as well as long term requirement of Numbering resources. We are of the view that the stakeholders have again exaggerated the disadvantages and concerns in implementation of 11 digit numbering scheme.

We appreciate that the proposals put forward in the consultation paper can make the 10 digit numbering plan sufficient for the next 2 to 3 years but keeping in mind the growth rate of the telecom services, the International experience and the technological advancements – 3G, 4G and Internet Telephony etc., we are of the firm view there is a requirement of 11 digits in the long run. Realising that the operators need some time to upgrade their existing infrastructure to cater for 11 digits, we have proposed the implementation of 11 digits with effect from 1<sup>st</sup> April 2013. In fact there is only one country (China) which is ahead of us in terms of mobile connections. China has already implemented 11 digit numbering scheme. Even countries like Indonesia with 200 million subscribers and Germany are following 11 digit numbering scheme. Thus the support systems in terms of IT, BSS OPS, International roaming, SIM cards are already available. We hereby provide our point wise comments to the common arguments used by other stake holders:

**1. Level 2- 6 are presently allocated to fixed line numbers should be reorganized and some of the levels to be utilized for mobile number :**

The fact that the fixed line subscribers are SMEs , Corporates and MNCs which are very heavy users and invest a lot in terms of stationery, visiting cards to advertise their numbers, this has not been taken into account while recommending this solution. In fact when fixed line numbers are dropping fast, these services require support rather than suggesting to have a reorganization in the numbers used by them. Secondly, though the fixed line numbers may be dropping, there is another segment i.e. Limited mobile category, which also shares the numbering plan arrangement with fixed line services. This service still has growth prospects in terms of usage like a common phone for those who can not afford a mobile for each family member. The services offered under this category are also being offered as PCO and R DEL scheme which are utilized by poor masses in our country.

- 2. The proposal to mandate '0' dialing for Intra service area call to mobile will increase the mobile number length to 11 digits and would also lead to call failure.**

The fear of call failure is misplaced. The calling pattern can be controlled by giving suitable announcements while dialing and advertisements before the introduction of '0' prefixing for intra service area calls. While this proposal adds to the numbering resources, the proposal of removing the necessity of dialing zero while dialing to a mobile customer will not result in creation of any additional numbering resources.

- 3. Moving to 11 digit scheme would require all switches to be modified which involves significant cost and effort; Old switches of BSNL are not equipped to handle 11 digit numbering.**

The upgradation in the switching network has to be done with the technology evolution as well. For example, many service providers have implemented NGN switches. Even IT systems have to be upgraded periodically. The useful life of switches is taken as 10 years. Many fixed switches of BSNL anyway, require replacement as they are much beyond their useful life.

- 4. Services/Applications Eco System – all the applications including banking, rail booking etc are designed for 10 digit numbers.**

Though it is a fact that the above mentioned services are designed for 10 digit numbers, the issue has been unnecessarily hyped as only simple redesigning of query is required for catering to 11 digit numbering. It may be mentioned here that length of the number series has gone a number of successful changes during the last decade and as such they should not be any problem in designing these queries for 11 digit numbering.

- 5. A large number of CLI display services in India are capable of displaying 10 digits CLI and the same will start displaying erroneous data.**

We are afraid this statement is not based on facts. Even today, International CLI which is of more than 11 digits is supported by all the display devices in India. The CLI is given by Network and there does not seem to be any issue in displaying it into the displaying devices.

6. **All the 500 million subscribers will be disturbed in case of migration to 11 digit numbering scheme.**

Seeing the growth which India is witnessing, the inconvenience will be much more at a later stage when there will be a larger subscriber base.

7. **Given the limitation of 15 digits in 3G PP, the call routing scenarios in case of MNP will need to be examined and the same may hinder in implementation of MNP.**

The proposal for 11 digit numbering is to be effected from 1.1.2013. Thus, the issue will not be there.

8. **International roaming tie ups with operators across the world :**

The roaming agreements can be made operational with a single vendor who acts as a hub. Slowly the direct testing with individual International operator can be achieved later on.

Thus, to summarise, we are of the opinion that in case, the revision in National Numbering Plan is to be done, it is to be done with a long term planning perspective which should take into account the growth of subscribers in the country and the evolution of new services. From a long term perspective, 11 digit numbering is the best solution and the telecom operators should start upgrading their systems from now onwards so as to be ready for the change over by 1<sup>st</sup> April, 2013.