

COMMENTS on consultation paper on Numbering Plan 2019

The first major change in NNP was brought about in 1993. The prime driver in this change was to provide differentiation between basic services (fixed line) and other services (eg CMTS ,paging services).

Since CMTS/paging was a small fraction of subscribers base only one label 9 was thought to be adequate for a long time. Hence label 9 was primarily used for service identifier (other than fixed).

In 2003 the prime driver was to take care of larger no of mobile players operational in the national network. In 2003 revision this aspect was ignored that fixed lines are small fraction rather than mobile subscribers (as opposed to in 1993). Hence we continued with larger allocation of national numbering scheme for minority subscriber population..

In 2019 we need to take care of large growth rate of mobile subscribers.

SOLUTION-1

Since fixed line subscribers are only about 2% of total telecom subscribers , we should apply prefix 0 in dialing all fixed line numbers (either from mobile or from fixed lines) (today also we apply 0 for all fixed lines destinations for all calls originated from mobiles and all inter-SDCA calls/inter-circle calls from fixed lines to fixed line destinations) . Hence dialing 2 , 3 ,9 from fixed lines or mobiles will indicate(after due allocation of mobile labels of 2,3,.....9 to mobile service providers) dialing to mobiles (anywhere in India) .

This will ensure freeing up all labels from 2, 3...8 (except 5) for mobile without the need to change the STD codes (which is meant for fixed lines only) & without the need to change the dialing pattern (except prefixing 0 for landline numbers) even for large number of smaller BSNL exchanges. This will create enough capacity for both fixed and mobile numbers.

It also means that mobile-to-mobile calls & fixed-to-mobile calls will not require any 0 (irrespective of destinations). It may be noted that vast majority of today's calls (at least 98%) are landing on mobiles) .This will make most of the calls easier to dial. Of course first few digits of mobile numbers will predict circle& operator (It may be noted that most of the inter circle calls land on GMSC as termination is decided by GMSC (by HLR query)).

The method would give a uniform 10 digit numbering scheme for fixed and mobile and all 10 digits would always be dialed whether the subscriber dials a local number of a long digit number.

This will allow all numbers (land line or mobile) to remain unchanged.

This will not compel the change of level 1 numbers and will not need to change special services/emergency services.

The service providers need a very small time to implement. There is no need to restructure the network, re-arrange POIs, and change the routing and billing information. The service providers with legacy fixed network will also find it easier to implement. This will also handle unexpected growth in fixed line base due to unexpected technological breakthrough in WLL or fixed access technology.

As noted by TRAI the general awareness of both rural as well as urban subscribers about use of dynamic lock facility has increased over the years. Further, the dynamic locks were crucial when the price difference between a local and STD call was significant, and hence potential chances of unauthorized use was high. But, presently when the price difference between STD and local call is negligible, the same code may be used together for locking/allowing local as well as STD calls. The code for allowing/blocking ISD calls may continue as earlier.

Issues for consultation

Q1. Whether, the unified numbering scheme should be introduced in India? If yes, please provide the possible ways of implementing it with justification.

RESPONSE: NO please refer the SOLUTION1 for details.

Q2. 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.

(i) Vacating the sparingly used fixed line levels '3', '5' and '6' for allocation for mobile services

RESPONSE: Vacating 2, 3, 4, 6,7, 8 for mobile services is needed. Please refer SOLUTION1.

(ii) 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?

RESPONSE: Accessing mobile should not need any access digit. Instead accessing landline from any number (fixed or mobile) should need 0 prefixing. Please refer SOLUTION1 .

(iii) Shifting Data only mobile numbers from 10 digit to 13 digit numbering.

RESPONSE : NOT needed. We hardly have such mobile numbers.

(iv) Moving on to 11 digit numbering scheme for mobile and continuing with 10 digit numbering for fixed line services :

RESPONSE : NOT NEEDED. Please refer SOLUTION1.

(v) A combination of some of the above

RESPONSE : Please refer SOLUTION1.

(vi) Any other option

RESPONSE: Please refer SOLUTION1.

Q3. Do the present criteria of utilization for allocation of numbers ensure efficient utilization of the numbering resources or would you suggest some other criteria?

RESPONSE: YES

Q4. Do you feel that sparingly used MSC codes may be withdrawn and reallocated to another TSP whose subscriber base is growing?

RESPONSE: NOT Recommended now. This will create immense burden on the operator.

Q5. 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?

RESPONSE: YES. This will impose accountability and optimization.

Q6. 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?

RESPONSE: Pricing not needed. This will create unnecessary burden

Q7 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.

RESPONSE: Automation of Numbering RESOURCE has risk due to malfunctioning of allocating software.

Q8. 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?

RESPONSE: YES we should implement SOLUTION1 .After implementation of SOLUTION1 the periodicity of review can be 10 years.

Q9. Any other related issue.

With kind regards

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