



01st August 2024

Shri Sanjeev Kumar Sharma,
Advisor (BB&PA)
Telecom Regulatory Authority of India
05th Floor, Tower-F, World Trade Centre
Nauroji Nagar, New Delhi-110029

Subject: Consultation Paper on “Revision of National Numbering Plan”

Dear Sir,

This is in reference to the Consultation Paper issued by the Authority on 06th June 2024 regarding “Revision of National Numbering Plan”.

In this regard, we, Tata Teleservices Limited (TTSL) and Tata Teleservices (Maharashtra) Limited [together called “TTL”] hereby enclose our response to the questions raised in your above-mentioned Consultation Paper.

We believe TTL response will be given due consideration.

Thanking you and assuring you of our best attention always.

Thanking you,

Yours sincerely

Mukesh Dhingra
General Manager – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
For Tata Teleservices (Maharashtra) Limited

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*TRAI Consultation Paper on "Revision of National Numbering Plan"
Comments by Tata Teleservices Limited & Tata Teleservices (Maharashtra) Limited*

At the outset, Tata Teleservices Limited and Tata Teleservices (Maharashtra) Limited [together called "TTL"] express our sincere gratitude to Telecom Regulatory Authority of India (TRAI) for releasing the consultation paper on "**Revision of National Numbering Plan**" for stake holders' comments.

We, TTL would like to submit our response to the issues and concerns as mentioned in the Consultation Paper is as follows:

Q1 Are there any TI resource shortages envisaged in the near future due to the presently adopted SDCA based fixed line Telecom Identifier scheme? Is there a need to revise the criterion prescribed by DoT for allocation of additional Telecommunication Identifier (TI) resources for fixed line access services? Please provide answers with detailed justification.

TTL Response: The presence of enterprise subscribers is limited to key circles and cities due to industrialization. It would further improve with an increase in industrialization at other locations/cities where more and more enterprises will make inroads in the years to come. At this stage, there is a need for additional numbering series for wireline segment due to their inherent use cases. As far as underutilized SDCAs are concerned, those numbering resources can be merged with the big SDCA as it will have the least disruption. Criteria for the allocation of fixed line numbering resources can be based on factors like class of city, population, current utilization, etc., under which wireline services are currently offered.

For example, in Manglagiri, no TI for fixed line services is available, causing customer dissatisfaction and business loss.

Q2 How can the (a) Spare SDCA codes and (b) Unused sub-levels out of the levels allocated to TSPs be best utilized to cater for future requirements of TIs for fixed-line access services? Please provide a detailed answer.

TTL Response: Utilizing current spare SDCA codes can increase the availability of TI for fixed-line access services. Smaller SDCAs can be merged to create bigger SDCA, subsequently moving to an LDCA based numbering scheme which will optimise TI resources.

Q3 As is the case currently with mobile numbers, in order to ensure availability of TIs for fixed lines, should 10-digit closed numbering scheme be made applicable to fixed line also? Please provide answers with detailed justification.

TTL Response: A closed 10-digit numbering scheme will optimize, reduce wastage and ensure adequate availability of TI. It will streamline dialling pattern to a great extent however, it will impact the user experience while dialling within the SDCA.

Q4 Will migrating to LDCA based TI scheme address the constraints in SDCA based fixed line TIs? Please provide answers with detailed justification



TTL Response: Migrating to an LDCA based TI scheme will ease the routing at the network level as it will be done at LDCA level in place of currently handling over of calls at SDCA level. However, there will be major customer disruption due to the change in number from SDCA to LDCA and associated complexities w.r.t billing system, IT platform etc.

We understand the current VNO license is also issued at the district level. Migration from SDCA to LDCA will increase the reach of the VNO licensee beyond the allocated district, which may allow the use of numbers from the district level to the LDCA level. This may require an amendment to the existing license conditions.

Based on this understanding, it is suggested that we should avoid LDCA based migration due to the high stakes involved w.r.t customer dissatisfaction and associated complexities.

Q5 What are the other possible options, if any, to address the currently envisaged constraints in TI resources for fixed lines in an efficient manner? Please provide your answers with a detailed proposition (including technical challenges, changes required in handling, routing, interconnection and termination of emergency services and other essential calls and associated cost [1] benefit analysis). Supportive documents, if any, may also be provided to justify your answer.

TTL Response: We can start with the merging of small SDCAs with no subscriber/limited base with bigger SDCAs in phase 1 with minimal disruption. Non-utilized numbering resources can be allowed in the SDCA where business is increasing, or industrialization is happening. As far as the dialing pattern for level 1 calls can continue to be controlled by the DoT, but the final termination number can be given to operators instead of BSNL.

Q6 Is bulk allocation of TI by few TSPs for providing SIP and PRI based services likely to create TI resources shortage in near future? If yes, what are the suggested means to address this issue? Please, provide your answer with supportive data.

TTL Response: PRI and SIP connections are not for retail use, as these connections are given to large enterprises that make use of them to meet their business requirements. Due diligence is always given before providing numbering resources under PRI or SIP. The control of the numbering resource should remain with TSP, as they understand the criticality of the numbering resources as well as business requirements.

Due to higher industrialization within specific SDCA's compared to other SDCA's, the penetration of wireline series is not uniform across locations, leading to particular SDCA's reaching extremely highly utilized stages like Gurgaon, Noida, Manglagiri, etc.

TI resources can be increased by way and means as suggested in response to Q 2.



Q7 Is there a need to introduce appropriate definition for 'inactive connection' for fixed-line services and the exact time duration after which, TIs associated with these inactive connections can be put to reuse? Is there also a need to revisit the definition of 'inactive connection' for Mobile services? Please provide your answers with detailed justification and suggested definition.

TTL Response: It is always good to have a definition for an inactive connection. In the absence of such a definition in the case of fixed line service, a minimum 90-day period is the cooling period post-disconnection for recycling the numbering resource to offer to the new entity.

Q8 (a) Whether charges should be introduced for existing and newly allocated TI resources to ensure their efficient utilization? If yes, what should be the charging mechanism and applicable charges? Please provide detailed justification along with supportive documents, if any.

TTL Response: It is not desirable to put charges on the allocation of numbering resources. Telecom services already have a very low ARPU; therefore, it will be a dent to the TSPs if charges are imposed on numbering resources. It will be passed on to customers, which will further make telecom services more expensive. While optimal use is always the highest priority as it is a resource that is used to provide the services, TSPs are also allocating these resources after due diligence.

(b) Should a financial disincentive be imposed upon TSPs for retaining X% or more of the allocated TIs remaining as unutilized beyond a certain timeframe? If yes, please specify the X% with suggested disincentive mechanism and retention timeframe with detailed justification?

TTL Response: There is no need for financial disincentive for underutilization of numbering resources. It should be looked at from the perspective that, due to the lower industrialization in other SDCA's, there is a smaller subscriber base, resulting in underutilized numbering resources.

Any FD in such cases will be deterrent to a TSP; therefore, such a move should be avoided.

Q9 What is the minimum contiguous range of unutilized TIs which the TSPs should be allowed to surrender for mobile and fixed-line services.

TTL Response: It is always a challenge to surrender a less utilized numbering series. There are always active customers, and surrendering such a series could lead to disruption and customer dissatisfaction.

Zero utilization should be the only criteria where number resources can be asked for surrender. Wherever merging of SDCA is to be initiated or LDCA-based numbering is decided, then it will be discussed before taking any surrendering of numbering resources so that subscribers are not impacted.



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Q10 Are there any constraints envisaged in TI resources and its allocation for Machine-to-Machine (M2M) services? If yes, what changes should be incorporated to cater for its future requirements? Do support your answer with detailed justification.

TTL Response: No comments

Q11 What constraints/issues if any, are currently envisaged in the procedure being followed for allocation of Level-1 short codes by DoT? Should the level-1 short codes be reserved for government entities only? Will allocation of level-1 short codes on chargeable basis solve the issues identified in aforementioned question? What are the other possible suggestions for judicious allocation and effective utilization of level '1' numbering resources? Please support your answer with detailed justification.

TTL Response: Level '1' is used for accessing special services, like emergency, supplementary services, inquiries, and operator-assisted services, and should be reserved for government entities only because these are used for emergency and other government. Services for helping the citizens of the country. Hence, it should be reserved for government entities only.

For effective utilization, the licensee should seek a utilization report of Level 1 short codes from the respective entities using them, and on the basis of the same, they can withdraw non-usage.

Q12 What are the global best practices being followed for judicious allocation and effective utilization of short codes (akin to Level-1 short codes in India)?

TTL Response: Global best practices for the allocation and utilization of short codes vary by country and regulatory jurisdiction. Common best practices include clear criteria, transparent monitoring, collaboration between regulatory authorities, industry stakeholders, and telecommunications service providers. Effective enforcement mechanisms and encouraging innovation and competition. These practices ensure short codes are allocated to entities with genuine needs and can be actively utilized for their intended purposes. Regular audits and reviews help identify inactive or unused codes, and periodic reviews assess the effectiveness of policies and procedures.

Q13 Are there any constraints/challenges envisaged with regards allocation and utilization of TI resources for Service Control Point (SCP) codes and Signaling Point (SP) codes respectively? If yes, what changes should be incorporated to cater to future requirements of the aforesaid codes? Do support your answer with detailed justification.

TTL Response: We don't feel that there are any challenges being faced by us with regards to the allocation and utilization of TI resources for Service Control Point (SCP) codes and Signalling Point (SP) codes.



Q14 What constraints/ challenges are anticipated with regards TI resources for Location Routing Number (LRN) codes to cater for futuristic requirements? What changes, if any, should be incorporated to effectively address its future needs? Do support your answer with detailed justification.

TTL Response: No comments

Q15 What constraints/ challenges are anticipated in the allocation of TI resources for Intelligent Network (IN) Services like Free Phone service, Premium services, International Toll-Free Service (ITFS), etc.? What changes, if any, should be incorporated to cater for its future requirements? Do support your answer with detailed justification.

TTL Response: No comments

Q16 What constraints are envisaged towards TI resources for MCC [1] MNC codes being used for Captive Non-Public Networks (CNPNS)? What changes, if any, should be incorporated to cater for its future requirements? Do support your answer with detailed justification.

TTL Response: No comments

Q17 Apart from the questions posed above, are there any additional issues being experienced by the TSPs regarding the aspects of the National Numbering Plan 2003 and TI resources allocation criteria? If yes, then the same may please be brought out in detailed elaboration with supporting documents.

TTL Response: Third-party applications like True Caller, Samsung Dialer's, One Plus Dialers, MI, and Apple base the crowdsourcing and the numbers against a particular entity/person's name, which don't get cleaned up when such resources are surrendered by the existing entity. The new entities do not accept recycled resources as they continue to reflect the old entity's name, hence it is difficult to use resources optimally. Also, note that the 140 series is by default tagged as SPAM by many such OEMs (even if the number never issued to any entity).