Your Ref: CP on Developing a unified numbering plan for fixed line and mobile services, dated 20th Sep 2019.

Date: 13th Nov 2019

To
U.K.Srivastava, Pr. Advisor (Networks, Spectrum & Licensing)
Telecom Regulatory Authority of India, New Delhi, India

Sub: Comments on Consultation paper– Regarding

Sending through E-mail: ***pradvns1@trai.gov.in*** **&** ***rksingh@trai.gov.in***

Dear Sir/Madam,

Please consider following is submitted w.r.t **"Q9: Any other related issue"**

Please refer Chapter-III, Item No. 3.3, line No. 6 on page no. 26 of above CP "**Effective Utilization of Recycled mobile phone numbers"**

All stake-holders seems to be **conveniently ignoring** the following scenario, but this is the time to consider and overcome the in-convenience. For understanding to all stake-holders, detailed information is as follows:

Present situation:

People may drop/withdraw/close/discontinue/disconnect their mobile numbers. Due to coverage/usage pattern, people are using more than one mobile connection. This is leading high consumption of mobile numbering resources. Tele-service providers are re-issuing the discontinued mobile number to their new customers after certain period.

As a result:

- Whenever a person takes a new mobile connection, it happens that his/her this new mobile number was earlier used & disconnected/discontinued by one/multiple people. Thus, a person gets a new mobile connection with a used mobile number.
- When issuing a new connection, the Tele-service providers do not mention to their customer whether they are providing a new mobile number or a recycled mobile number.
- A portion of new mobile connections are normally issued with the re-cycled mobile numbers.
- One mobile number may have more than one customer at various time intervals.

The practical problems with Recycled mobile phone number:

- Mobile number is being shared/distributed (with the knowledge of it's user or not) to "virtually infinite" people/points. The user of the number cannot track all such points and update/inform them as and when his/her mobile number is changed.

When a person discontinues his/her mobile number, now, the new owner (i.e. the customer who had new mobile connection with re-cycled mobile number) receives communication (Ex: calls, messages, OTPs, etc.) related to the previous owner(s) of that mobile number and often creates an un-comfort/frustration/agony to the present/new owner of that mobile number.

- Individuals/firms/etc. normally keep the information of their clients wherein contact mobile number is one. Contact number will be checked normally through OTP/other means before storing in the database for further communication (calls/Message/OTP/etc.). These mobile numbers may be of local/international.

  Whenever their client changes his/her contact mobile number, if not informed, communication to the client continues on his/her old number. If that mobile number is allotted to another person, then the inconvenience starts for the new owner of the mobile number. There will be adverse business impact to the firm/company too. If the communication is sensitive, it may even cause a potentially serious issue.

- During usage of mobile services, the customer normally mentions their mobile number in various platforms/web-sites/apps. In present day scenario, it is impossible to tell about how many places these mobile numbers are being stored / recorded as data/reference. Hence, it is not possible to communicate to each and every point about change/drop of their mobile number. This cause a situation where the present owner of a mobile number receives various kinds of messages/calls intended for the previous owner(s) of his/her mobile number.

Sample examples: may be accessed from the following URLs:

- https://webquestionanswers.com/are-you-using-recycled-or-reissued-mobile-number/
- https://timesofindia.indiatimes.com/city/chennai/Second-hand-phone-numbers-give-users-sleepless-nights/articleshow/19641293.cms
- https://labs.detectify.com/2018/05/24/recycled-phone-numbers/
- https://www.telesign.com/blog/post/number-deactivation-and-the-recycled-phone-number-dilemma/
- https://forums.digitalspy.com/discussion/1190557/recycled-mobile-phone-numbers
- https://www.sfgate.com/business/article/Service-providers-recycling-cell-phone-numbers-is-2505219.php
- https://www.techsling.com/2015/08/wrong-number-large-companies-are-recycling-cell-phone-numbers-now/

Who are all involved in this process?

- Tele-service Provides
- Users of Mobile Number as data record/reference (Individuals / organizations /firms / institutions /web-sites /apps /etc.)
- Mobile Customers

Tele-service providers (TSP):
As the people themselves share their mobile numbers to multiple people/apps/firms/websites etc., it leads the presence of their mobile numbers in various databases of various firms. The TSPs do not have any control over it to withdraw such records whenever customer drops that mobile number.

User of Mobile Number as Data Record/reference (UMNDRs):
Firms/companies, web applications/sites, Mobile APPs, online/offline service providers, individuals, etc. have mobile number of their clients as a record/reference to provide their services/products. Once the mobile number provided by their client, these mobile numbers will be kept in their data base after due verification (ex: sending OTP and confirming the same or any other industry practices). These UMNDRs does not know if the customer drops their mobile number or if the same mobile number allotted to another customer. Sometimes this situation creates adverse business impact to UMNDRs.

Mobile Customers:
Customers may share their mobile numbers during the usage of mobile number due to present day requirements. Whenever customer drop their mobile number/changes their mobile number, intimation of number change will be normally provided to few as per their importance/priority. To convey all points, it is not possible to track/remember to how many points their mobile number is passed/registered/recorded.

As explained above, none of above themselves have control over this situation leading to un-comfort/frustration/agony to the new user of the re-cycled mobile number.

New Numbering Plan should address the issues:

Still today, **such new customers (who had new connection with re-cycled numbers)** are suffering from un-wanted communication of previous users of that mobile number; it is revealing that this problem has not been addressed and no solution in place. Hence, the new number plan should have clear solution to solve the issue as detailed below:

- **W.r.t new customer of re-cycled mobile number:** After taking a new mobile connection with a re-cycled number, a person should not suffer by receiving various kinds of messages, calls, etc. intended for the previous owner(s) of his/her mobile number.

- **W.r.t UMNDRs:** After its client's mobile number is changed, a firm should be able to know about this change and stop communicating on that mobile number even though the client has not informed the firm that he/she has discontinued his/her mobile number.

- **W.r.t Previous User of a mobile number:** After disconnecting his/her connection, a person should not become victim by losing his/her sensitive information to a different person.

Suggestion:

1) The process of phone number Re-Cycling should be clearly re-defined to overcome issues raised due to allotment of used numbers for new connections.

2) Tele-Service Providers & UMNDRs should have certain unique platform to minimize the in-convenience caused due to the use of re-cycled mobile numbers.

S S Vas
ssvask2012@gmail.com