# zoom

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**Subject:** ZVC India (**Zoom's**) response to TRAI's Consultation Paper Dt 06JUN24 on Revision of National Numbering Plan.
Ref1: DoT UL Licensee for Access For All 22 Circles with NLD & ILD Dt24APR23 offering Internet Telephony Services.

Dear Sir,

We have obtained All India UL Access License (22 Circles) in early 2023 for offering Internet Telephony Services and had to limit our rollout to few main circles as Numbering and associated regulations are supportive of circle wise large scale rollouts. However, we are a small operator with focus on Cloud Based Voice Solutions for Enterprise users (Mostly MNC/GCC in ITES Software Dev, BPO, Call Centre) and we would like to welcome a **Nationwide Access License** envisioned in the TRAI consultation paper Dt 11JUL24 on the Framework for Service Authorisations to be Granted Under the Telecommunications Act 2023.

1. TRAI rightly has envisioned a **Nation Wide Authorisation for Access Service** as per Governments theme of One Nation One License (as proposed in 2.86 Sl.No 2 as Category A Page 63/59 in the Service Authorisations consultation paper).
2. As complementary to above, with reference to the Numbering consultation paper please find our response mainly seeking a **National LRN and National MSC Codes** instead of the current numbering plan allocated by LSA/Circle.
3. This will address below challenge we have with customers. Ex. A MNC with employees in 6 branch offices in 6 Telecom Circles is required to do the following:
   a. Number Allocation & Management: Employees of each branch office needs to be allocated numbers from respective circle numbers. If the company has 6000 employees spread in 6 circles, we will need to allocate 2000,1500,1000,800,700,600 numbers from the 6 different circles number range allocated to the Licensee. The 6000 numbers will not be contiguous. Please see illustration in Table 1 in next page.
   b. Multiple CAF Customer Acquisition Form & KYC; Customer has to sign different forms for 6 circles where they have branches to provide numbers to their employees. A Nationwide Bank would require to sign 22 Forms. Company KYC has to be done at 6 or 22 circles for every circle wherever company has branches and needs numbers.

We request TRAI to accommodate a **National LRN and National MSC Codes** which will enable new Telecom operators to enable faster and cost effective roll out of services which will allow onboarding Enterprises/Businesses with less paperwork and number management. This will also enable our services to become Nationally available quickly and will also benefit to Indian Companies with offices spread across India.

Thanking You,
For and on behalf of ZVC INDIA PRIVATE LIMITED (UL Licensee)

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**Table 1: Illustration of Number Allocation to an MNC company having branches in 6 Circles and 6000 employees**

| Sl No | Branch Office | Telecom Circle for Numbers | No of Employees | Start Number | End Number |
|---|---|---|---|---|---|
| 1 | Mumbai | MUMBAI | 2000 | 68285 87000 | 68285 88999 |
| 2 | Pune | Maharashtra | 1500 | 68276 45000 | 68276 46499 |
| 3 | Delhi | Delhi | 1000 | 68275 32000 | 68275 32999 |
| 4 | Hyderabad | Andhra Pradesh | 800 | 68286 43000 | 68286 43799 |
| 5 | Bangalore | Karnataka | 700 | 68274 65000 | 68274 65699 |
| 6 | Chennai | Tamil Nadu | 600 | 68273 86000 | 68273 86599 |

**Q1-Q5:** *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.*

As proposed in Q3 new fixed line numbers should be provisioned on schema like Mobile Numbers (MSC Codes). TRAI should consider even leapfrog **to a National Numbering Scheme (instead of LDCA or LSA/Circle)** by allocating MSC Codes to operators by allocating One Fixed LRN to each operator. Advantages of this scheme are as follows:

1. Increases availability of codes for wireline/fixed services and mobile services.
2. Allows fixed number porting between geography and migration to other operators.
3. Migrate current working numbers to new scheme by supporting migration over 2 year period:
    a. 6 months for operators to obtain numbers and configure as per new numbering scheme.
    b. 6 months to allocate new numbers to working numbers.
    c. Website and paper advertising funded by DoT.
    d. Both old and new numbers simultaneously functional for 6-month period (routing to be supported by operators).
    e. 6 months Old numbers will only receive CNA- changed number announcement.
    f. Migration complete.

**Q5** *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.*

It's the misuse of DID numbers used for Telemarketing which needs to be monitored. If we block +91-STD-AB-1234 they will start calling from +91-STD-AB-1276 +91-STD-AB-1249…. and has become a never-ending problem.

**Q11:** *Short Code Services:*

Level 1, 3 Digit services should be reserved for different types of emergency/public utility essential services. With many SCP being cleared and available codes can be allocated to States/Departments for non-essential services using following schema: **1-800-SCP-ABCD/1860-SCP-ABCD.**

Central Government and each state will get different SCP Codes. ABCD will be become state specific Service Short Code. Ex.

  i.   1-800-700-ABCD: For Central Government Services (SCP 700 to 709 can be reserved for Central Government Services/Departments).
  ii.  1-800-711-ABCD: For Delhi Government ABCD will be their 4-digit short code services which Delhi Government can allocate to different different/purposes by informing DoT.
  iii. 1-800-722-ABCD: For Maharashtra Government
  iv.  1-800-744-ABCD: For Tamil Nadu Government
  v.   ……

These SCP codes will not be serviced and managed by any Telecom Operator, like other SCP code based IN services (1800 & 1860) which are offered by an operator and who have settlement arrangement with other operators. This is a free routing service, Operators will just route the call to the termination number. Any other entity (non-Government) who needs such a service should procure 1800 & 1860 numbers on a commercial basis offered by operators.

**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.*

Even Mobile numbering should be allocated on National basis. This can be done by allocating one new Mobile LRN to each operator. (The current circle based MSC Code /LRN can be continued for working numbers). For National LRN allocated MSC Codes as we have 2 MCH to distribute the administration load between 2 MCH it is proposed that:

  i.   MCH1 can manage MSC Codes which is Odd number in the 4th Digit
  ii.  MCH2 can manage MSC Codes which is Even number in the 4th Digit

THANK YOU