

E Mail: ccsbng@gmail.com or rnguru@gmail.com

Tel:26713616

CONSUMER CARE SOCIETY®
593, 24th Cross BSK II Stage, Bangalore-560070
(Regd.under Karnataka Societies Regn. Act. 1960, Regn. No: 388/94-95)

President: G S Gundu Rao Tel.: 26717338	Secretary: Ravindra Nath Guru Tel: 26713616 M-9845683220	Treasurer: K N G K Sastry Tel.26715719
---	---	--

09-03-2010

Telecommunication Regulatory Authority of India
New Delhi

Email: dafn@traf.gov.in

Attention: Principal Advisor(I&FN), TRAI

Dear Sir,

Refence: TRAI NEW DELHI Dated 19th February 2010 on CP 02/2010

Our comments on various issues of above Consultation Paper on Efficient Utilization of Numbering Resources CP are highlighted in yellow:

Q1. Do you believe that 10 digit numbering scheme should be continued? If yes, then what method(s) do you suggest to make adequate resources available for next five years i.e. up to December 2014 and beyond?

No

Q2. Comment on the advantages and disadvantages of accessing intra service mobile from the fixed line by dialing '0' for generating more number resource for mobile services?

We agree there would be advantages in interoperability of accessing from one kind to another. There seems to be no advantages in keeping each service exclusive, digitalization has resulted in total transparency as far as switching and transmission are concerned. What distinguishes is the presentation layer of the OSI architecture. We think in the increasingly digitalized world the customer terminals will be offering many routine house keeping functions such as Meter telemetering, security systems, temperature control machines, control of domestic appliances, Since each of these will need control and monitoring to be done remotely either via internet or mobile or fixed networks there would many numbering demands in each household.

Q3. Do you believe that the only solution to the number resource problem is to migrate to an 11 digit numbering scheme for mobile and retaining 10 digits numbering scheme for fixed line? What kind of problems do you foresee in having a mixed numbering scheme?

Yes. Other solutions will offer only temporary solutions. There should be a transition phase to mitigate problems. There would be substantial equipment updates necessary for effecting the changes required.

Q4. If your preference is 11 digit numbering scheme for mobile services then what comment on the advantages and disadvantages of such a scheme.

We agree with TRAI's analysis

Q5. Comment on advantages and disadvantages of migrating to integrated service area based scheme for fixed and mobile. If this scheme is adopted what should be the time frame for migration?

Q6. Do the present criteria for allocation of the numbers ensure efficient utilization of numbering resources or would you suggest some other criteria?

Q7. With reference to para 3.3.1, comment on the need to file a numbering return to the numbering plan administrator for monitoring and ensuring efficient utilization of the numbers?

Q8. Give your views on pricing of numbering resources? If pricing is implemented, what should be the method adopted for such pricing.

Q9. If pricing is implemented should it be for all resources held by the service providers or only for future allocations?

No comments on Q 5 to9

Regards

G S Gundu Rao