



15th March 2010

**Principal Advisor (I&FN),
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi-110002**

**Subject: Counter Response to Stakeholders Views Posted on TRAI Website on
Consultation Paper on Efficient Utilization of Numbering Resources
dated 20th January 2010**

Dear Sir,

We had already submitted our response to you on 26th February 2010. Please find enclosed our Counter response to the views posted by various stakeholders on the TRAI website.

We hope that our above-mentioned submissions would merit the kind consideration of the Authority.

Thanking you and assuring you of our best attention always.

Yours sincerely,

**Anand Dalal
Vice President – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
For Tata Teleservices (Maharashtra) Limited**

Enclosures: As above



Tata Teleservices Counter Response to Comments Submitted by Stakeholders to TRAI Consultation Paper 02/ 2010 on Efficient Utilization of Numbering Resources

The comments to the present Consultation pertain mostly to review the following main aspects:

- i) Is the current allocation method of numbers meeting the needs of service providers and inefficient utilization? Should this be continued or needs revision.
- ii) Suggested steps to make adequate numbering resources available.

Our comments on the responses posted on the TRAI website are as follows:-

- a) There have been many changes in the assumptions made in the 2003 NNP for allocation of the numbering resources. We feel that the current method of allocation of numbers needs to be reviewed. While almost all comments submitted in the responses do not recommend a change of the present allocation method being followed, however, most also goes on to state that the utilization of numbers has not been done efficiently. We would like to reiterate that there is an urgent need to change the current numbering allocation process and this should be done based on the market need of the service provider. We feel that to correct this anomaly, the changes envisaged in the allocation should incorporate that priority based allocations be done. We recommend that the priority should be given to those operators, who have only a maximum of 25 lakhs unutilized connections to be sold in the market, hence it is critical for them to get new MSC codes immediately.
- b) We agree that the 10 digit numbering scheme with suitable modification can meet the needs in the short term. This should be done with modifications below:-
 - i) For intra circle dialing, we strongly recommend that "0" dialing from fixed lines to mobile numbers be introduced. This does not have any significant impact on the billing and charging mechanism since even on date the billing systems software are distinguishing based on the called number taking into account the prefix of "0", or "00" or "+91" for calls made from fixed lines to mobiles.
 - ii) This will make available sufficient numbers for allocation for mobile services, with least adverse impact on both service providers and subscribers. This option will spare many SDCA codes for Mobile number series.



- iii) This is the most amenable solution, and the benefits accruing from this suggestion far outweigh all other cost-benefits related to implementation and changes.
- c) We endorse the view that there is need to migrate to a uniform integrated dialing with similar 10 digit codes for both mobile and fixed services. The SDCA code must form an integral part of the subscribers identity, wherein the subscribers number will become a standard 10 digits as CCC XXX YYYY (where C- is the SDCA code, XXX, YYY are subscriber identity numbers) for fixed and mobiles. This will be enabling the path for fixed to mobile Number Portability, and numbering scheme will be independent of type of service provided by the service provider.
- d) Complete levels 7 and 8 should be allocated for mobile services. The SDCA codes presently allocated should be vacated and re-allocated. This will make approx 2 billion additional numbers for mobile services. Upon implementation of this we do not foresee any requirement to change the currently allocated levels in the 9X mobile services.
- e) As is well known, fixed line services are already facing severe challenges and there has been a constant decline in the additions for this service. It is imperative that we do not disturb the subscribers availing these services. **We do not recommend any changes in the current levels for fixed line services.** This is borne by the fact that adequate numbering resources can easily be made available with the implementation of the "0" prefix dialing suggested above. With the implementation of the above there will be no need to change the levels allocated to fixed services.
- f) We were the most adversely affected in the migration to 8 digit level "5" initially and then this level "5" itself was changed to level "6". *We do not advocate the vacation of level "6", since it took approximately 16 months to migrate when the change from level "5" to "6" was done.* In case the Authority contemplates recommending withdrawal of certain levels from us as well as other operators due to poor utilization of their basic service allocated numbers, then going forward all the operators should be asked to **allocate new basic service numbers** in level '2' (which should be allocated by DoT to all operators), so that there is no impact on services to both existing as well as the prospective new basic service subscribers i.e., all new additions in basic services should be done on one single level. By doing so, we will get some vacant codes/ sub levels in level 3, 4, 5 & 6 for provision of mobile services.
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