

Counter Comments to TRAI CP on “Revision of National Numbering Plan”

Executive Summary

Airtel thanks the Authority for the opportunity to provide its counter comments to responses received on the consultation paper (“CP”) “Revision of National Numbering Plan”. These counter comments are an extension of the arguments previously presented in the main response to the CP. For the sake of continuity, here is a quick summary of the key submissions made earlier:

Fixedline Telecom Identifiers / Numbering Resource Allocations:

- ✓ *The present fixedline numbering series allocation methodology is highly inefficient. It needs to be brought up to date with what the needs of today’s technological advancements are.*
- ✓ *The fixedline numbering series allocation should move away from the present SDCA-based allocation approach and towards the LSA-based numbering scheme allocation approach.*
- ✓ *To implement this shift successfully, two important points need to be considered:*
 - a. *It should be mandatory for all TSPs (including PSUs BSNL & MTNL) to establish interconnections only at one location in an LSA level for exchange of voice traffic within prescribed timelines (say, within 3 months but before issuing LSA-based allocation).*
 - b. *The calls destined for emergency services and originated from fixed line numbers (irrespective of SDCA/LSA based numbering scheme) should be routed at ERSS helpdesk.*
- ✓ *Under this approach, the existing Subscriber Numbers as well as the SDCA codes already allocated should be allowed to continue for existing customers, while the new LSA-based numbering series will be used for new connections.*
- ✓ *Under the LSA-based allocation method, the fixedline numbering scheme will mandatorily have to be a 10-digit closed numbering scheme, i.e., the customers will have to dial all the 10 digits prefixed with a Zero (‘0’+ SDCA/STD code + Subscriber Number) even from within the same SDCA/LSA.*
- ✓ *The new LSA-based allocations can be started from a migration or cut-off date onwards, i.e., from 1st January 2025.*

Other Telecom Identifier Allocations:

- ✓ *There are not likely to be any constraints for the numbering resources or telecom identifiers for the Level-1 services, LRNs, M2M series, SCP codes, SP codes and IN numbering series. Hence, there is no requirement to make any changes to their allocation criterion.*
- ✓ *The TI for captive networks (CNPNS) are expected to see constraints in future. These can be addressed by making the MCC-MNC code consistent with the other Tis, i.e., of 3 digits, as the present 6-digit MNC code unjustifiably restricts the TI pools available for CNPNS.*

Counter Comments to TRAI CP on “Revision of National Numbering Plan”

Definition of ‘Inactive Connection’:

- ✓ The ‘inactive connection’ for fixed-line services is akin to ‘inactive connection’ for mobile services hence there is no need for any intervention or for creating any specific definition for this purpose.
- ✓ The definition of inactive connection for mobile series and practice has hitherto been well settled and all the processes well aligned. Hence, there is no need to revisit this definition for mobile as well.

Charging of Telecom Identifiers:

- ✓ Airtel does not agree with the introduction of any charges for the existing and/or new TI allocations, nor does it believe any financial disincentives should be applied.
- ✓ In India, TSPs already pay a substantial amount towards License Fee (LF) as a % of revenue, instead of administrative cost recovery. Hence TSPs in India contribute a significant sum through LF for the use of TIs. There is, therefore, no justification for any separate charging of the TIs.

Surrendering of Telecom Identifiers:

- ✓ There is no requirement to define surrender process for underutilized TIs.
- ✓ DoT should not withdraw suo-motu the TIs already allocated to TSPs. A confirmation from the TSP shall be mandatory before considering withdrawal of any TI.

In the following section Airtel submits its counter comments on key points raised by some of the stakeholders.

Counter Comments to TRAI CP on “Revision of National Numbering Plan”

(a) Fixed-line numbering allocation to continue on SDCA based allocation:

One of the stakeholders has argued that there is no shortage of fixedline TI, hence no need to revise the criterion. Another respondent has said that moving away from SDCA based allocation may cause hardship to the customer.

Response:

Airtel reiterates there is a shortage of fixedline TIs presently, and challenges arising out of inefficient allocation method of SDCA based allocation needs to be reformed and changed to an LSA based allocation.

The present assignment approach of fixed-line TI is **not at all optimum** and leads to inefficient utilisation of the numbering resources. **On the one hand, a TSP gets stuck with surplus in low-demand locations, on the other, it faces shortages/ constraints in high-demand locations.** In some cases, the shortage may be at SDCA level and, in some, at the LDCA level (for instance, the number constraints in Gurugram LDCA, which is also an SDCA with the STD code 124).

As already discussed in the instant consultation paper, there are many existing SDCAs where the number series are exhausted and the TSPs are finding it challenging to serve the growing customer base.

Therefore, in the view of Airtel, the only sustainable solution for obviating constraints at both SDCA and LDCA level is to move away from the present SDCA-based allocation approach towards the LSA-based numbering scheme, akin to the mobile numbering resource allocation.

Under this approach, the fixed-line number series shall no longer be issued on an SDCA basis, but rather for the entire circle/LSA. This allocation method will significantly enhance the availability of numbering resources for TSPs.

In fact, to mitigate any impact on the existing fixedline customers, Airtel’s proposed solution is least disruptive and easiest to implement. Under its proposed solution, the existing Subscriber Numbers as well as the SDCA codes already allocated shall be allowed to continue for existing customers, while the new LSA-based numbering series is used for new connections.

This will mandatorily (but simply) require the fixedline numbering scheme to be a 10-digit closed numbering scheme, i.e., customers will have to dial all 10 digits *prefixed with a Zero* (‘0’+ SDCA/STD code + Subscriber Number) even from within the same SDCA/LSA.

Counter Comments to TRAI CP on “Revision of National Numbering Plan”

This approach will minimise customer inconvenience with the least network disruption, while simultaneously ensuring an adequate supply of numbering resources to meet the immediate requirements and ease out shortages in number resources.

To implement the above solution, there are two important considerations:

- *It should be mandatory for all TSPs to establish interconnections at one location in an LSA level for the exchange of voice traffic, within prescribed timelines (say, within 3 months but before issuing LSA-based allocation).*
- *The calls destined for emergency services and originated from fixed line numbers (irrespective of SDCA/LSA based numbering scheme) should be routed at ERSS helpdesk.*

It must be noted that establishing interconnection at the LSA level will be technically efficient and also economically prudent for all TSPs. Further, this approach will also help the PSUs by freeing up their capital and resources in SDCAs/LDCAs where their equipment is reaching the EoL (end of life). This will eliminate the need to establish the interconnection at SDCA/LDCA which is extremely time consuming and slow process which in turn leads to delays in roll out of services, only with BSNL. Moreover, the SDCA based numbering scheme was based on distance based call charges that no longer exist and the distributed switching architecture has been replaced with centralized switching system even at BSNL.

This is extremely important for the success of LSA level allocation and both DoT and TRAI vision for digital connectivity across the country.

Under Airtel’s proposed approach, **there is unlikely to be any challenge** at customer billing level (billing system) and network routing level (minor updates may be there) if new numbers are allocated at LSA level. However, in terms of IT development, TSPs may have to streamline their internal number management processes to ensure proper customer journey management – both of which will undergo some changes.

The new LSA based allocations can be started from migration date 1st January 2025 onwards.

Counter Comments to TRAI CP on “Revision of National Numbering Plan”

(b) Unified numbering scheme for Fixed & Mobile:

Some stakeholders have argued that a unified numbering scheme for fixed and mobile should be considered.

Response:

Airtel does not agree with the suggestion of a unified numbering scheme for mobile and fixedline services.

First of all, there is no constraint anymore for growth of Mobile services, a fact also acknowledged unanimously by almost all stakeholders, hence asking for a unified numbering scheme makes no sense at all. Further, since most of the Indian Telecom Service Providers (TSPs) offering Mobile and Fixed Line services have separate networks, it is not feasible to use the unified numbering scheme in Indian telecom scenario.

Migration to the Unified Numbering Plan will require complex and major changes to be made at the network level, i.e., changes not only just entire fixedline network but also in the mobile network, changes in regulatory provisions for fixed line interconnection and changes for the customer, changes in the routing & billing systems (inter-operator) - all of this resulting in increased and avoidable associated costs of transition. The hassles and costs will likely outweigh the perceived benefits, if any. International experiences also suggest that there are very few countries which have implemented the Unified Numbering scheme. Considering the miniscule number of fixed line connections in India as on date, there is no logical requirement of having the unified numbering plan.

In-fact there may be another downside of a unified fixed and mobile series i.e. risk of revenue arbitrage. Since the TRAI and the government has recommended specific policy incentives like exempting the wireline revenue from application of license fee, in the event of a unified numbering scheme, it will become difficult to assess the use and revenue linked to particular service use and may instead create risk of arbitrage and deprive the exchequer of its logical due.

Hence Airtel recommends the Authority to not consider or agree with unified numbering scheme.

Counter Comments to TRAI CP on “Revision of National Numbering Plan”

(c) Number Portability for Fixed line services, and also IN numbers/TIs:

Some stakeholders have argued that number portability should also be extended to fixed line services, and also for IN numbers Telecom Identifiers (TIs)

Response:

Airtel believes the scope of the extant consultation paper is limited to addressing the constraint in the telecom identifiers, and the number portability is out of scope of the present CP.

In any case, the ask of fixed number portability (FNP) is too premature for various reasons. The first basic requirement in India is to create and expand fixedline services, that are barely 2.5% penetrated¹, due to inefficient allocation method of fixedline TI & challenge of Rights of Way. Laying fixedline access network across length and breadth of nation should be the focus to significantly increase teledensity for fixed-line services and ensuring widespread provision of broadband connectivity. Implementing FNP could potentially cannibalize the existing limited customer base, than expanding these essential services to new geographies and customers.

Further, deliberating on FNP is an altogether different subject matter. The number portability in fixedline will require substantial changes in the network including call flow solution similar to or possibly more complex than the MNP for mobile services. Due to legacy network elements in fixed line services, the question of fixed line portability will only make the whole process complex.

Therefore, Airtel submits to the Authority that there is no requirement to consider number portability for fixedline services. The Authority should keep the focus of consultation and its recommendations to the aspect of making numbering allocation more efficient for fixedline resources, to enable service providers to freely expand the services as per market demand.

In this context, Airtel reiterates that time has come now to migrate the fixedline numbering allocation to LSA based 10 digit closed numbering services, from the present SDCA based allocation approach which has constrained the expansion of fixedline services.

Similarly, we submit that argument for asking portability of IN services like Toll Free services too is unfounded. Neither does the scope of CP cover this aspect nor is there any market need for the same. These are business / enterprise solutions with dedicated focus / SLAs based clientele. The market requirements of IN services are effective and competitive as users are able to acquire these numbers from TSPs as per business needs. Hence there is no need to consider the argument of portability of IN services.

¹ Overall wireline teledensity as on 31st May 2024, as per TRAI monthly telecom subscription report