

## Comments on TRAI consultation paper on LDCA based numbering

As a fixed line subscriber, I am a stakeholder in the matter and am offering following comments-

Any shift to LDCA based numbering scheme will cause huge hardship as it involves number change for entire fixed line customers. It will be a big problem to remember new numbers or otherwise track number changes, more so for senior citizens. Letterheads, calendars, diaries, visiting cards will carry wrong number and some will lose touch of their friends and relatives.

If recourse to 10 digit numbering scheme is adopted, the problems will multiply many fold. Most telephone instruments in use are basic instruments without memory for storage of contact details, unlike mobile handsets. Remembering and even correctly dialling a ten digit number is a challenge for the illiterate and super senior citizens.

Under the circumstances large scale number changes should best be avoided till there is no option.

As per figure 2.1 of consultation paper the wireline DELs is shown as less than 3 crores. As per table 2.5 the fixed line subscriber reported to TRAI is 2.74 crores. As against this the allotment of fixed line numbers is 6.28 crores. The difference is massive and cannot be explained by allotment of PRIs and or SIP trunks. It seems already a huge number of spare indicators are available with operators which are shown as allotted. It is not known what methodology for verification of allotted numbers is followed at LSA for approving data provided by operators, while seeking additional indicators. The data presented so far in the consultation paper regarding DELs and numbers allotted first needs to be analysed and reconciled before taking it as a base for planning. The difference could be 20 percent on account of advance allotment for future expansion needs of large entities but 100 percent excess cant be ignored.

To avoid hoarding of indicators by operators each excess indicator allotment beyond genuine technical requirements on account of PRI trunks, testing lines, reserve for corporates (say 20 percent extra) may be billed at the lowest tariff plan of the operator concerned. Such lowest tariff plan should be the lowest published by the operator and offered for general public with both outgoing and incoing facility. General public should be able to obtain connections under the plan. Maybe TRAI can stipulate such a plan after comparing lowest plan of operators with both incoming outgoing facility. It should not be a special plan say at Rs 1 offered to the corporate alone to explain the allotment but on ground not offered to retail subscribers.

From the data presented for the 12 SDCAs having shortage of indicators, it is observed that in all these SDCA s (except Rajpura) at least 2 operators are having NIL indicators and NIL DELs in use. Their identifiers could be allotted to needy operators in these SDCA facing genuine constraint. At Rajpura at least one operator has NIL indicator/DEL whose identifier could be released. Also it is observed that AP SWAN may have operations only in AP and its identifier could be released in other states.

These measures could perhaps ward off the need for number changes for years to come and it is suggested that these comments may be considered.

It would be pertinent to point out a related issue. The introduction of 0 prefix for mobile has caused considerable hardship to consumers of MTNL. Adjacent SDCA numbers and mobiles of the country cannot be accessed without opening STD from landlines. Earlier mobiles could be accessed and also adjacent SDCA and also Meerut was made accessible on regional STD by dialling 91/95 without opening STD.

It is practically not possible to leave STD open foerever due to possibilty of misuse. MTNL seems to have no NLD operations across country and perhaps for this reasons their limited free calls plans are far cheaper than unlimited free calls plans (Rs 250 vs 500). This puts the customer at huge disadvantage. Example gatekeeper or employee allowed access to STD barred number cannot contact owner's mobile anymore. Allotment of common 2 digit code for regional STD and mobile access from landline can mitigate this problem.

The above comments may not be structured in manner as to appear as questionwise answers for issues in consultation paper, but may please be considered keeping in mind that they emanate from a retail telecom consumer and not operator.

A handwritten signature in black ink, consisting of a vertical line on the left, a horizontal line at the top, and a large, stylized 'S' or 'R' shape in the middle, all underlined.