



13<sup>th</sup> November 2019

**Shri U.K. Srivastava**  
**Pr. Advisor (Network Spectrum and Licensing)**  
**Telecom Regulatory Authority of India**  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg  
(Old Minto Road)  
New Delhi – 110002

**Subject: Consultation Paper on “Developing a Unified Numbering Plan for Fixed Line and Mobile Services”.**

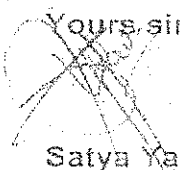
Dear Sir,

This is in reference to your Consultation Paper dated 20<sup>th</sup> September 2019 on “Developing a Unified Numbering Plan for Fixed Line and Mobile Services”.

As desired, we hereby enclose our response to the questions raised in your above-mentioned Consultation Paper. We hope our response will be given due consideration. We shall be obliged to address any further queries from your good office in this regard.

Thanking you and assuring you of our best attention always.

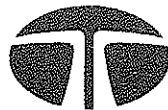
Yours sincerely,

  
Satya Yadav  
Addl. Vice President – Corporate Regulatory Affairs  
Tata Teleservices Limited  
And  
Authorized Signatory  
For Tata Teleservices (Maharashtra) Limited  
E-mail: satya.yadav@tatatel.co.in  
Mobile: 9212109948

Encl: As above

**TATA TELESERVICES LIMITED**

2-A, Old Ishwar Nagar, Main Mathura Road, New Delhi - 110065  
Tel.: +91-11-66558666, 66558555 Fax : +91-11-66558908, 66558909 website : [www.tatateleservices.com](http://www.tatateleservices.com)  
Registered Office : 10th Floor, Tower 1, Jeevan Bharti, 124 Connaught Circus, New Delhi - 110001  
CIN - U74899DL1995PLC066685



**TATA**

**TTL response to Consultation Paper on**  
**"Developing a unified numbering plan for fixed line and mobile services"**

**Question 1. Whether, the unified numbering scheme should be introduced in India? If yes, please provide the possible ways of implementing it with justification.**

**TTL Response:**

TTL understand that Introducing Unified numbering scheme for Indian telecom networks will help to mitigate the numbering resource crunch for short duration of time. Least disruptive mode of adding SDCA code to subscriber number should be adopted for unified numbering scheme implementation. Further as mentioned data only SIMs allocated should be moved to 13 digits as suggested in the consultation paper.

**Question 2. If the answer to the preceding question is in the negative, which of the following options can be tried out? Please provide details and justification considering the advantages and disadvantages.**

- (i) Vacating the sparingly used fixed line levels '3', '5' and '6' for allocation for mobile services

**TTL Response:**

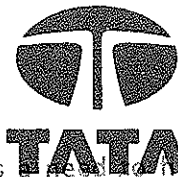
Vacating subscribers from existing fixed line series mentioned as Level 3, 4 and 6 is discriminatory. As subscriber under these series are enterprise customers therefore TTL do not suggest to vacate subscribers from existing levels. TTL has already surrendered few series under 62 and 63 series so that those numbering resources can be allocated for mobility. Further It is disruptive for subscriber who has distributed these numbers to their local and international clients. Therefore, any change/withdrawal of running number will impact the business both for operator and subscriber.

- (ii) Accessing Intra-service area as well as inter-service area mobile from fixed line by dialing prefix '0'; for generating more numbering resources for mobile services?

**TTL Response:**

As mentioned in the consultation paper these are short term measures to free numbering resources. In TTL view making changes in the network is time consuming and costly affair specially for fixed line network which has legacy nodes.

- (iii) Shifting Data only mobile numbers from 10 digit to 13 digit numbering



**Question 5. Do you feel that there is need to file an "Annual Return on Numbering Resource Utilization" to the numbering plan administrator for monitoring and ensuring efficient utilization of number?**

**TTL Response:**

As numbering resources are important for any operator to plan a product, associated billing and related aspect. Operators are aware of the values of numbering resources therefore it should be left to the operators to use the numbering resources wisely for their product design. Surrendering of level will severe impact on the business for any operator.

**Question 6. What are your views on the pricing of numbering resources? If pricing is implemented should it be for all resources held by the service provider or only for future allocations?**

**TTL Response:**

It is not recommended to set pricing at this stage because the number allocation is not distributed equally amongst operators.

**Question 7. Do you feel that an automated allocation of numbering resources using number management system software is necessary to speed up the process of allocation and collecting returns in an efficient and transparent manner? Do you feel that this work may be assigned to an independent body by the licensor? Please provide details.**

**TTL Response:**

In TTL view, it can be avoided once we move to 11 digits numbering scheme.

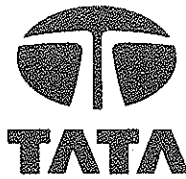
**Question 8. Do you agree that a revised and new National Numbering Plan and a consolidated list of short code allocations should be issued? If so, what should be the periodicity?**

**TTL Response:**

TTL recommend for a revised numbering plan considering new set of services, its projections etc. Existing allocation of numbers including short codes can be maintained at portal with access rights so that updated information is available all the times to all the operators.

**Question 9. Any other related issue.**

**TTL Response: NA**



TTL Response:

Feasibility from Mobile operators cannot be taken for freeing few numbering resources. As TTL is offering only wireline services therefore it is not applicable.

- (iv) Moving on to 11 digit numbering scheme for mobile and continuing with 10 digit numbering for fixed line services

TTL Response:

Considering legacy nodes in wireline it can be taken as first step for migrating mobile numbers to 11 digits in first phase.

- (v) A combination of some of the above

TTL Response:

Same response as given in point iv above.

- (vi) Any other option

TTL Response:

Moving to 11 digits to both mobiles and fixed line numbers can be final approach which can be taken.

**Question 3. Do the present criteria of utilization for allocation of numbers ensure efficient utilization of the numbering resources or would you suggest some other criteria?**

TTL Response:

Detailed discussion can be initiated with all operators and experts from TRAI/DOT/TEC so that standard practice of purge timer value, reuse of number etc. can be finalized.

**Question 4. Do you feel that sparingly used MSC codes may be withdrawn and reallocated to another TSP whose subscriber base is growing?**

TTL Response:

As mentioned above in response to Q2 (i), it is disruptive and discriminatory to ask few sets of subscribers to surrender their number which have commercial impact for operator and subscriber. Therefore, we should resort to other method like moving mobile numbers to 11 digits, using spare SDCA codes for mobility numbering.