

**Response to TRAI's Consultation Paper on Efficient Utilization of
Numbering Resources dated 20th January 2010**

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?

VTL Response: We are of the view that the 10 Digit Numbering scheme should be persisted with.

1. In furtherance of the aforesaid we would also like to express our consensus with the observations made by the Authority in clause 2.1.1 wherein it contemplates that a theoretical numbering capacity of 8 billion numbers exists (excluding levels '0' and '1').

However, the ramification of the present scenario wherein levels '9' and some levels of '8' have been reserved for the mobile subscribers, which are increasing by leaps and bounds, while reserving the others, barring '0' and '1', for the fixed network renders 6 Billion numbers unusable for mobile networks thereby squandering the Number Resource.

2. With the distance being killed it is high time that at least LDCA numbering scheme instead of present SDCA numbering is adopted. The definition of Local call should be made LDCA wise to bring it more near to definition of Local call in mobile networks which is LSA wise. Definitely some extra efforts will be needed but this is a normal price for any change and has been done earlier several times, the latest being fixing of Level 2 for BSNL/MTNL numbers.

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?

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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?

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

VTL Response: The notion of introduction of '0' dialing for intra service area calls to mobile will effectively increase the mobile number strength from 10 to 11 digits thereby attracting the disadvantages of 11 digit scheme and hence is not sustainable. Therefore, in

view of the foregoing, we would like to suggest and urge the authority to abstain from rolling over towards the 11 digit scheme.

Switching over to a mixed numbering scheme and elucidating inherent issues with rolling over to 11 digits, it is submitted that the routing arrangement, which is working on a closed numbering scheme, will have to be modified to an open numbering scheme. Such a switchover may result in interim call failures and hence inconvenience to the public at large. Moreover, as contemplated by the Authority itself, the Caller line Identification (CLI) will not be displayed properly in case of R2 MF signaling. Further, Lawful Interception will also be affected. This definitely will be a major Security scare.

Furthermore, apart from the cost involved in making the switches compatible with such change, other service providers, which provide different services to the mobile users, will have to reconfigure their applications / systems to make them compatible with 11 digit scheme thereby leading to inevitable inconveniences.

Moving over to the issues at the subscriber level, such a change would compel every telecom user to manually change/ modify their phonebook/ phone directories accordingly. To make it worse, if the numbers stored in the phone/ SIM memory are not modified accordingly, it will result in widespread dissatisfaction amongst the public with respect making outgoing calls and more particularly with respect to sending SMS.

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?

VTL Response: Implementing the proposed measures as aforesaid will definitely meet the desired number capacity to cope with the growing need of the telecom industry. Further, the instant option requires a comprehensive and thorough technical analysis. Therefore, at the moment the need for the proposed option does not arise.

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

VTL Response: The present criteria for allocation of numbers is itself sufficient to check the abuse of number resource, since before further allocation of number series it mandates every operator to demonstrate 60% utilization of the numbers.

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?

VTL Response: In the present scenario, a lot of information, pertaining to utilization, is sought by the licensor whenever the operator applies for a new numbering series. Further, TRAI have prescribed new formats wherein the operator is already providing the necessary information.

Q8. Give your views on pricing of numbering resources? If pricing is implemented, what should be the method adopted for such pricing.
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Q9. If pricing is implemented should it be for all resources held by the service providers or only for future allocations?

VTL Response: As aforesaid, the checks put forth by the Authority to curb the abuse of the numbering resource are adequate. To supplement these by levying an additional cost or attaching a price to the numbering resource will have adverse ramifications on the operators, who are already overburdened with other high duties and levies while offering lowest tariffs to the subscribers thereby leading to a diminished ARPU. As far as numbers are concerned they are the primary requirement for any telecom network & should be considered as part of License allocation.

Therefore, such a levy by the Authority will only act as a hindrance to the spread and growth of telecom industry in the country.