

TVR/VEL/020
19 March 2010

The Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
Next to Zakir Hussain College
New Delhi 110002

Dear Sirs,

Sl. No. 40 (R)

Efficient Utilization of Numbering Resources

This has reference to the Authority's Consultation Paper on the above subject. We are pleased to submit as **Annexure – 1** our comments on some of the points raised by other operators in response to the issues raised for in your numbering consultation paper.

We hope that our submissions will merit the kind consideration and support of the Authority.

Kind regards,

Sincerely yours,



T. V. Ramachandran
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VODAFONE COUNTER COMMENTS

We are pleased to submit our comments on some of the points raised by other operators in response to the issues raised for in your numbering consultation paper.

Q.3 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?

In response to the views submitted by some stakeholders that as a short term solution a '0' should be prefixed for all mobile numbers and in the long terms, the industry should move to a 11-digit numbering scheme, it is submitted that

1. The submission is not logical as in both cases, the stakeholders are recommending an 11-digit numbering level rather and it is not clear why the level should be changed twice.
2. The various issues and concerns that have been raised by us would be equally valid in both these options suggested by some stakeholders.
3. More importantly, there does not seem to be a very compelling reason provided by any stakeholders for migrating to a 11 digit numbering plan even in the near future despite submissions by several operators supporting such a transition.
4. As we have noted in our submission, a large pool of nearly 6 billion numbers would become available for mobile services by simply reshuffling existing allocations in the fixed numbering levels.
5. Thus, even under the existing 10-digit numbering scheme, a more efficient allocation and utilization of numbers would ensure that the pool of numbers thus freed up would be sufficient to cater to the industry for a sufficiently long period of time in the future.
6. It may not be out of place to point out that the various projections for subscriber numbers by different authorities (referred to by the Authority in its consultation paper on spectrum) hover around the billion subscribers mark by 2014. The availability of 6 billion numbers within the 10-digit numbering scheme would provide a 500% cushion to the projected subscriber base in 2014.
7. In any event, we believe that no one can argue that numbers being a scarce resource should not be efficiently utilized. Migration to an 11-digit numbering scheme should be considered only after all opportunities for efficient use are exhausted.
8. In light of the above, we once again reiterate that there is no reason to contemplate a migration to an 11-digit numbering scheme at this juncture.
9. This position can of course be reviewed by the Authority from time to time as and how the future numbering landscape unfolds..

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

In response to a submission by some stakeholders that in case of new service providers, new blocks of numbers may be allotted after demonstrating 50% utilization of numbers, it is submitted that

1. we would first like to reiterate our view that the current practice of allotting new block(s) of numbers after 80% utilization to fixed & after 60% utilization to mobile is adequate and sufficient and should continue to be followed.
2. There is no basis or justification for any discriminatory approach to allocation of numbers between different sets of operators. Any unequal treatment of one set of operators in a discriminatory manner would not be fair in the interests of level playing field and also highly not recommended.
3. The suggestion that the authority should follow a differential approach for measuring utilization and award of numbering resources is clearly unjustifiable and not in the interests of the sector.
4. It is submitted that if at all the Authority feels the need to modify this procedure, it should be applicable to all operators equally.

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?

In respect of the views of some stakeholders that it should be made compulsory for operators to file Numbering return to the numbering plan administrator once every year, we wish to reiterate that:

1. This information is already being provided to the licensor in a prescribed format.
2. In addition to the above, operators are also continuously submitting many different kinds of monthly, quarterly and periodic reports to the DoT, the TERM Cells, the TRAI and other statutory and regulatory bodies. All of these contain various types of information including those on utilization and availability of numbering resources.
3. Any further requirements would be an unnecessary burden on the industry, increasing the burden of regulatory compliance.