

To,

Shri Aravind Kumar,  
Joint Advisor ( I&FN),  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhavan,  
Jawaharlal Nehru Marg,  
Old Minto Road, New Delhi : 110002

Sub. : Consultation Paper No. 2/2010 on “ Efficient  
Utilization of Numbering Resources “ ....

Sir,

Namaskar !

Please find herewith our suggestions on a consultation paper No. 2/2010 on “ Efficient  
Utilization of Numbering Resources “.

Please acknowledge the receipt.

Thanks.

Sincerely Yours,

( Dr. Kashyapnath )  
President

**CONSUMER PROTECTION ASSOCIATION**  
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SUGGESTIONS FOR THE CONSULTATION PAPER NO. 2/2010 ON  
“ EFFICIENT UTILIZATION OF NUMBERING RESOURCES :

Now a days Telecommunication is a better, faster and cheaper services for the consumer. We found in our study that an un expected growth in Telecommunications sector and advancement in Telecommunication technology, leads us to think on the management of numbering resources. A major modifications will not be beneficial for the illiterate people in rural & tribal areas as well as the other consumers. So it makes sense to use the resources optimally in a managed and controlled manner. Our suggestions are :

1. We think that 10 digit numbering scheme should be continued because of the availability of too many options. Retaining 10 digit scheme with additional level/sublevel will be useful to get additional numbers. It is known to the consumers.
2. In future, to generate more number resources for mobile services dialing “ 0 “ to access intra service mobile from the fixed line can be useful as it is in routine practice for adjacent SADA.
3. In near future we can manage the problem in retaining 10 digits numbering scheme only. But for the bright future of Tele communication we should plan for 11 digit numbering scheme as :
  - (i) Our country is second in the world in population.
  - (ii) Our country is fast developing country.
  - (iii) Population growth is also high.
  - (iv) Financial growth is improved.
  - (v) Our country is rural based and the purchasing power and awareness is also improved in Rural & Tribal areas.
  - (vi) Advancement in Telecommunication Technology is very fast.
4. The criteria, presented in this consultation paper will definitely ensure efficient utilization of numbering resources.

5. Annual numbering return :

It is utmost necessary to device mechanisms to have a good monitoring system for effective utilization of numbering issues, because less than 1/3 numbers are re utilized from the disconnected numbers.

Non annually but monthly detailed “ numbering return “ described in this consultation paper should be sent to the numbering plan administrator for better utilization and transparency.

6. Pricing of the numbering resources :

We felt that charging a reasonable amount for each number allocated would definitely encourage the service provider for a more efficient utilization of numbers. But there should be no extra charges on consumers on the name of numbering or other by the service providers. An auction number should also have a reserve price.

We agree that para 3 of part 6 of “ Telecommunications ( Carrier Licenses ) ( Amendment ) Regulation 2008 of Hong Kong will be useful for efficient utilization of Numbering Resources.

7. The pricing on numbering resources should be implemented for future allocation for the consumer benefit.