

From

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To

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Sub: Comments On The Issues Raised In The Consultation Paper No.2/2010 On  
“Efficient Utilization Of Numbering Resources” Released On 20/01/2010 :  
Ref.No.413-1/2010-I&FN dated 5th February 2010 :

Dear sir,

After a long gap we are in receipt of a print copy of the consultation paper for our comments . I do not know what is the reason for stopping and the new decision to start once again. The following comments may please be considered.

### **Question 1**

The 10 digit numbering scheme shall be continued. Fixed line as none of the 22 countries, listed has ventured for 11 digits. Also it is likely that the fixed lines may soon disappear and become obsolete/extinct even before 2014 and need not worry about adequate resources. The 10 digit mobile number too may be retained.

### **Question 2**

Retaining the 10 digit scheme making access of mobile by dialing “0” from a fixed line phone within a service area also ( at present exempted from “0” use), can generate more number resources ( around 3 billion) for mobile services. This is possible using all the free sub levels 2 to 6. At present subscribers are already using “0” for calling adjacent SDCAs and also for mobile numbers in other areas.

### **Question 3**

No one probably believes that migrating to 11 digit numbering scheme for mobile and retaining 10 digit numbering scheme for fixed line can solve all resource problems as we are in India 2010. Definitely mixed numbering schemes are welcome. On an all India level, vacating few levels and sub levels will be advantageous while it can cause some inconvenience to certain pockets.

#### **Question 4**

We don't prefer 11 digit numbers for mobile. The disadvantages on 11 digit numbering scheme for mobile phones are vast compared to few advantages. Fully agree with the anticipated problems mentioned in 2.1.2.4. in the text.

#### **Question 5**

Migration to integrated service area based scheme is the need of the hour as this would enable implementation of number portability between fixed line and mobile networks. It has got the added advantage of avoiding access code "0" for inter services area calls. Time for migration, for changing data base can be within a short span of 6 months.

#### **Question 6 and 7**

As the present criteria for allocation of the numbers are arbitrary assumptions, based on money power and annual numbering returns.

The present Numbering Plan Administrator can be replaced by a specific audit group to ensure transparency and accountability. Details and procedure to prevent unfair and restricted trade practices by stake holders prevalent in other countries may be ascertained.

#### **Question 8**

It is true that various countries charge numbers adopting different approaches. That does not mean that India, where majority are below poverty line, also must pay charges. Of course, charges for vanity/ preferred numbers are widely adopted for higher revenue. If charging for the numbers allocated to operators is to be used as a tool to encourage efficient use of numbering resources, the charges should be substantial, say Rs.100 per annum. This amount shall not be passed on to consumers. The statements in 3.4.3 are unwarranted.

#### **Question 9**

If DOT is firm for collecting charges, it shall be only for future allocation to consumers, at low rates.

Thank you,  
P.A.Surendran from Palakkad- Kerala ..