

(Formerly ABTO)

AUSPI/12/2004/180

30th September, 2004

**Shri Pradip Baijal,
Chairperson,
Telecom Regulatory Authority of India,
A2/14, Safdarjung Enclave,
New Delhi - 110 029**

Sub : AUSPI Response to TRAI Consultation Paper No. 14/2004 dated 20th August, 2004 on Issues Pertaining to Publishing of Telephone Directory and Directory Enquiry Services.

Dear Sir,

We refer to the TRAI Consultation Paper No. 14/2004 dated 20th August, 2004 on Issues Pertaining to Publishing of Telephone Directory and Directory Enquiry Services.

AUSPI is pleased to provide its response on the various issues raised in the Consultation Paper by TRAI. These are detailed out in our response which is enclosed herewith for your kind perusal.

We look forward to participation in the Open House Sessions and TRAI's favourable consideration of our views while finalizing its determination on the subject.

Thanking you.

Yours faithfully,

S. C. Khanna,
Secretary General

CC: Dr D P S Seth, Member, TRAI.
Shri P K Sharma, Member, TRAI.
Prof. Sanjay Govind Dhande, Member (Part-time), TRAI.
Dr Arvind Virmani, Member (Part-time), TRAI.
Dr Harsha Vardhana Singh, Secretary-cum-Principal Advisor, TRAI.
Shri Sudhir Gupta, Advisor (QoS), TRAI.
Shri R K Bhatnagar, Advisor (FN), TRAI.
Shri Rajendra Singh, Advisor (MN), TRAI.
Shri M Kannan, Advisor (Eco.), TRAI.

AUSPI Response to TRAI Consultation Paper No. 14/2004 on Issues Pertaining to Publishing of Telephone Directory and Directory Enquiry Services

Questions for Public Consultation

1. Should the publication of the Telephone Directory of both the mobile and fixed customers be mandated or not?

The licence agreements for unified access service, cellular mobile service of fourth cellular operators and the new basic service do not provide for publication of telephone directory. The Unified Access Service Licence provides for availability of the complete list of subscribers on the licensee's web site (having pass word controlled access), so that authorized Intelligence Agencies are able to obtain the subscriber list at any time, as per their convenience with the help of the pass word.

The publication of the printed telephone directory of both the mobile and fixed subscribers should not be mandated for Unified Access Service Licensees in view of following reasons amongst others.

- Inclusion of a subscriber's name in the printed directory is not mandatory. Subscriber's name is excluded if one desires so.
- There are subscribers who do not want to share their numbers for privacy considerations and like to avoid unwarranted calls, different marketing companies make in connection with their sales promotions etc.
- The Present unprecedented growth of subscriber base of different operators would make the directory out of date on the

day of its issue requiring frequent upgradation/ reprint or supplementary issues.

- In the pre-paid mobile sector in particular, there is considerable churn of subscribers because of continued tariff competition amongst service operators. Also, a large number of subscribers are casual subscribers.
- There are frequent changes in the telephone numbers because of opening of new exchange/ shift etc.
- Frequent upgradation/ printing of the directory because of various reasons would involve additional cost to the operators.
- Due to the high number of subscribers using a telephone, printed directory is not a popular option among the consumers. It is more convenient to get desired information by dialing online directory enquiry services or from the web.
- Printing of voluminous directory on precious paper is wastage of national resource and can pose threat for the environment.
- Most countries where printed directory is available, have stabilized markets/ operation of number portability.

It is suggested that instead of printed telephone directory, the service providers may voluntarily provide on line directory enquiry services only for its own subscribers.

2. What should be the periodicity of publication of the Telephone Directory? Whether it should be annual, biannual or any other period?

and

3. What should be the coverage of the Directory i.e. whether it should be at LDCA level or at the circle level?

In response to question No. 1 above, we have stated that the publication of printed telephone directory for both mobile and fixed subscribers should not be mandated for Unified Access Service Licensees. If a Unified Access Service Licensee publishes printed telephone directory voluntarily, the periodicity of publication and the coverage of the directory i.e., whether it should be at LDCA level or at the circle level should be left to his discretion.

- 4** Whether pre-paid mobile customers are to be included or not in the Directory? If yes, indicate how it is to be implemented in view of the heavy churn in this segment.

In response to question No. 1 above, we have stated that the publication of printed telephone directory for both mobile and fixed subscribers should not be mandated for Unified Access Service Licensees.

If TRAI determines publication of printed telephone directory, pre-paid mobile customers may be excluded as most of them are casual users of the service and prone to churn.

- 5.** Is there any need for bringing out a Consolidated Telephone Directory of a circle? If so, whether the consolidated Directory should be separate for fixed and separate for mobile or it should be a combined One including all mobile and fixed customers?
What are your suggestions regarding the modalities for bringing out a consolidated Directory ?

In response to question No. 1 above, we have stated that the publication of printed telephone directory for both mobile and fixed subscribers should not be mandated for Unified Access Service Licensees. There is also no need for consolidated telephone

directory and if at all required the same can be fulfilled through directory enquiry service by all service providers for their own consumer base with interoperability of this service for all subscribers.

However, if a Consolidated Telephone Directory is decided to be brought out, it should be separate for fixed and mobile. A customer may not need directory for both fixed and mobile. A consolidated single directory for both fixed and mobile would be costlier and too bulky to handle necessitating number of volumes. In addition SDCA linked numbering for fixed and circle based numbering for mobile services would pose additional problem for fixed and mobile consolidation.

The modalities for bringing out a consolidated Directory can be decided by mutual agreement between service providers.

6. Whether the Directory could be priced for sale? If so, whether the pricing should be regulated or left to the operator to decide?

In response to question No. 1 above, we have stated that the publication of printed telephone directory for both mobile and fixed subscribers should not be mandated for Unified Access Service Licensees. However, If a Unified Access Service Licensee publishes telephone directory of his subscribers voluntarily, the issue of pricing should be left to him.

7. Should the provision of Telephone Directory Enquiry Services be mandated?

Provision of Directory Enquiry Service should not be mandated and should be at the option of the service provider.

8. Is there any need for a Unified Directory Enquiry Services for a circle?
What are your suggestions regarding the modalities for installing such a Unified Directory Enquiry Service ?

There is no need for a unified directory enquiry services for a circle. Instead of this if required, online directory enquiry services by all service providers for their own consumer base can be implemented and access of such directory enquiry services to be made possible from all the service providers networks in a standardized manner.

9. Should the Directory Enquiry Services telephone number be accessible from any telephone? What are your suggestions regarding the arrangements in this regard?

Yes, the Directory Enquiry Services telephone number of any licensee should be accessible from any telephone.

10. Should Directory Enquiry Service be charged or not?

The Directory Enquiry Service should be charged and the issue of charging level should be left with the service provider.