



**COAI RESPONSE TO TRAI CONSULTATION PAPER NO. 14/2004 ON
'ISSUES PERTAINING TO PUBLISHING OF TELEPHONE DIRECTORY AND DIRECTORY
ENQUIRY SERVICES**

Introduction:

COAI believes that in a multi-operator multi-service scenario, as it exists in India today, publishing of printed Telephone Directories by the individual operators as well as implementation of Directory Enquiry Services will neither be practicable nor serve the purpose for which these are intended to be introduced. Our submissions in this regard are as below :

1. **Exponential Growth in Mobile Subscribers:-** The mobile subscriber base has been growing at a CAGR of around 80-90% and it is expected that this sector will continue to maintain an aggressive growth trajectory at least over the next 3-5 years. The Authority too, has recognized this aspect of the fast paced growth of telecommunication. COAI apprehends that given this exponential growth in cellular mobile services, would make the Telephone directories redundant, even before they are published, thus losing the very relevance and purpose for which their publication is being contemplated.

2. **High Churn of Mobile Subscribers:-** As per the latest benchmarking study of the cellular mobile industry carried out by Price Waterhouse on behalf of COAI, there is a churn of around 6-7% every month in the mobile subscriber base. This is significantly higher than the churn in other comparative Asia Pac economies. The high churn percentage in the cellular mobile connections is another factor, which will make the printed phone directory redundant, as it will be impossible for the directory to have correct upto date information available in such a fast growing fast changing industry. The mobile number of a subscriber would change the moment he migrates to another service provider. The printed directories would thus not be very useful and may in fact lead to spurt of wrongly dialed calls resulting in unnecessary loading of the entire cellular network.

3. **Dominance of Prepaid Subscribers:-** The Authority is well aware that the prepaid connections contribute around 80% of the total subscriber base of the cellular mobile Industry. Prepaid subscribers also comprise of casual callers – for example mobile subscribers going into another service area may choose to buy a local SIM Card for usage for short duration (to save on roaming charges, etc). Such subscribers are especially more susceptible to churn and it would be extremely difficult if not impossible to maintain up-to-date information on them. Internationally too, as provided in Annexure



1 of Consultation Paper Pre-paid numbers are excluded from the Telephone Directories, as well as Enquiry services.

a) **Invasion of Privacy of the Mobile Subscriber:-** This is a very important aspect that must be considered by the Authority before making any recommendations on the publication of phone directories. The Authority is aware that the cellular mobile phone is a very personal communication device, which is usually with the subscribers 24 hours. Given the personal nature of the service, it is highly likely that the cellular subscribers would be extremely reluctant to disclose their personal mobile numbers in a public printed telephone directory as it could lead to increased likelihood of unsolicited calls/SMS messages, possibility of being personally disturbed at any time and at any place, etc. Women subscribers would be particularly reluctant to disclose their Mobile numbers on this account. Also, mobile phones are being increasingly given by parents to their young and teenage children for purposes of security. No parent would like the mobile numbers of their young children to be openly and publicly available as it could lead to problems of security, harassment, etc.

4. **Person to Person communication:-** The Authority is aware that unlike a fixed phone, which establishes a location-to-location communication link, a cellular mobile phone establishes person-to-person contact. The existing printed Telephone Directories and or Directory Enquiries services are only for fixed telephone connections and these serve the purpose of making available contact details & address of individual, company, organization etc. However in the context of the Cellular Mobile Telephony the communication is between, person-to-person, and hence extremely personalized. This number can be shared by the mobile subscribers' with the persons / set of persons who he wishes to allow access to his personal number. Similarly, the subscriber can also maintain the records telephone numbers that he wishes to access from his mobile phone.. The Mobile phone directory, which is one of the features available in the GSM handsets, provides such facilities.

5. **Payment of Roaming Charges :-** The Authority is aware that the facility for roaming and being accessible on the same mobile number anywhere in the city, State, country or the world is one of the key USPs of GSM cellular mobile services. The cellular mobile subscribers pay for this facility in the form of roaming charges, which are paid by the subscriber for receiving calls when he is outside his service area. Publication of a printed telephone directory or divulging his mobile number through directory enquiry



services would leave such subscribers susceptible to paying high STD & ISD roaming even for receiving unwanted calls while roaming outside their service area. Even presently many subscribers are experiencing the nuisance of unwanted calls from telemarketing operators for which they are often required to pay roaming call charges. The Authority may kindly note that the publication of a Directory with mobile numbers would exponentially increase the number of such calls and the nuisance to customers. The proposal of the Authority should thus be carefully be considered in context of Roaming charges, which will have to be paid by the subscribers for unwanted calls.

6. **Impact on Consumers:** - The person most impacted by the publication of Mobile Telephone Directory or Telephone Directory Enquiry Services would be the consumer, in terms of the following :

a) **Payment of Roaming Charges:** The subscribers shall have to pay for unwanted calls, which could also be while the subscriber is Roaming, nationally or internationally.

b) **Invasion of Privacy:** Public availability of a personal mobile number would lead to the possibility of the subscriber being personally disturbed by unwanted calls at any time.

c) **Security Issues:** With the help of Telephone Directory or Enquiry services, the contact details of the person can be obtained for nefarious activities. Subscribers especially the woman subscribers can be harassed by abusive calls/ SMS.

7. International Practices

From the data on international practices given in Annexure-1 of the Consultation Paper, it is not clear whether all service providers are required to print directories/provide Directory Enquiry Services individually. Moreover, practices also vary widely in different countries e.g.:

Belgium	– Prepaid subscribers are excluded. In India 80% of all new Mobile Subscribers are in this category. This will make directories useless for the purpose for which these are to be printed.
Greece	– Not yet in practice
France	– Mobile subscribers are excluded from printed directory – There is no Directory Enquiry Service for all subscribers
Italy	– These services are available for fixed line phones only.



UK	<ul style="list-style-type: none"> – There is no single printed directory of all subscribers Available – Mobile data available with Directory Enquiry Service is not comprehensive.
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Replies to Questions

In the light of the above general observations, we are giving below our considered views on the various questions raised in Chapter-3:

<u>Questions</u>	<u>Answers</u>
1. Should the publication of Telephone Directory of both the mobile and fixed customers be mandated or not?	No, it should be mandatory only for fixed lines. At the present stage of rapid growth of mobile subscribers of 80-100% per year, a printed directory of mobile subscribers will neither be practicable Nor will it service the purpose for which it is intended.
2. What should be the periodicity of publication of the Telephone Directory? Whether it should be annual, biannual or any other period?	Once a year for fixed lines only.
3. What should be the coverage of the Directory i.e. whether it should be at LDCA level or at the circle level?	At LDCA level for fixed lines. Private Operators who have a low fixed line subscriber base could jointly publish LDCA-wise directories with BSNL on mutually agreed terms. Circle wide directory could be printed for smaller circles with upto 2 million lines. A consolidated directory of a number of smaller LDCAs in a circle could also be printed.
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?	All mobile subscribers, both prepaid and postpaid subscribers should be excluded from printed directories.
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	It is reiterated that all mobile subscribers should be excluded from printed directories. Further, we believe that Circle-wise consolidated printed directory for fixed lines would become too voluminous and



<p>including all mobile and fixed customers? What are your suggestions regarding the modalities for bringing out a consolidated Directory?</p>	<p>inconvenient to handle and therefore should not be considered. .</p>
<p>6.. Whether the Directory could be priced for sale? If so, whether the pricing should be regulated or left to the operator to decide?</p>	<p>The Directory can either be priced or marketed free by the directory service provider by generating revenues through yellow pages. This should be left to the decision of the service provider. If necessary, maximum cost based charges could be prescribed by the Authority.</p>
<p>7. Should the provision of Telephone Directory Enquiry Services be mandated?</p> <p style="text-align: center;">AND</p> <p>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?</p>	<p>It should not be mandatory for each Access Provider to provide Directory Enquiry Service individually. This service could be provided on circle-wise basis for fixed line subscribers only, through a call centre by an independent operator. Mobile numbers should not be available through Directory Enquiry Service on account of the reasons given above All Access Service Providers should provide fixed line subscriber data updates on line to the Directory Enquiry Service Provider at prescribed intervals.</p>
<p>9. Should the Directory Enquiry Services telephone number be accessible from any telephone? What are your suggestions regarding the arrangements in this regard?</p>	<p>Yes, Directory Enquiry Service telephone number should be accessible from any telephone. A common 3-4-digit number should be allocated for this service.</p>
<p>10. Should Directory Enquiry Service be charged or not?</p>	<p>Directory Enquiry Service should be charged. In the event of the services being outsourced, the revenues could be suitably shared between Access Providers and Directory Enquiry Service Provider.</p>