



Attachment to Zain Letter No. (REG-266-20), Dated (27/9/2020)

National Numbering Plan and Instructions for Allocation and Reservation of Number Capacities

Zain appreciates the TRC efforts to amend the out-dated National Numbering Plan (NNP), and its associated document - Number Reservation and Allocation Instruction. The current two instructions are slightly more than 10 years old, and thus became insufficient to cope with the ongoing needs of the telecom technological advancement and evolution since then. 3G, 4G, IoT and M2M, and Cloud Computing are samples of the last decade emerging technologies that the existing NNP was introduced before. However, we hope that the coming new NNP would fulfil the today and tomorrow needs of the new telecom era, and for a fruitful outcome; we would like to provide the following comments and suggestions, hoping that the TRC would take them into consideration

General Comments

National Numbering Plan

Urgent need to address the long-dated issues

The NNP is designed basically and ultimately to allow licensees and other parties to use number capacities allocated to by the TRC to serve their needs and provide their daily services to their customers. However; we've seen that the new proposed NNP didn't address one of the most important and long-timed issue in the current course of operation of the NNP, which is the inability of Zain to use the fixed number capacities the TRC allocated to them more than 10 years ago (2011/2010), solely because Orange refused (and is still refusing) to open their networks to these number ranges, and without any acceptable justification, noting that it – Orange – has opened their networks to other licensees' fixed ranges in a loud and clear act of discrimination and anticompetitive practice that is still ongoing with tremendous negative effect on Zain in terms of financial, commercial, reputational and many other aspects.



We hoped the TRC would rather consider within this new NNP our multiple appeals asking to allow VoIP services on other than fixed number ranges, in particular mobile number ranges (or sub-ranges if preferable), we had addressed the TRC since 2015 to consider such approach in light of the inability of Zain to get use of the fixed number ranges we were allocated to use since 2010/2011. The current VoIP Statement of Implementation issued by TRC in 2007 was very clear in that regard when it called for amending the NNP to allow the use of any number range (including mobile ones) for IP-based voice services (VoIP).

Additionally; Zain was hoping the TRC would remove the national region prefix (02, 03, 05, 06) from the fixed number capacities, and be replaced by unified prefix for all fixed geographic services.

*Introducing a new number range for Internet of Things (IoT)
including M2M services*

Zain supports a dedicated number range for IoT in order to reduce the demand for mobile numbers, it is likely, in our view, that the number of mobile connected IoT devices will grow rapidly to very large numbers. With the existing demand for mobile numbers, this might necessitate additional digits in existing mobile ranges unless IoT numbers are separated.

It is very crucial to the consistency and continuation of the IoT/M2M service provisioning that the existing number capacities currently in use be the same, i.e the new capacity be applied only to the new sales (Customers), there are technical limitations and challenges that would make any changes to the existing base not doable. Therefore, the new IoT/M2M number range should be made available for new customers.

We also urge the TRC to allow for the allocation of numbers in blocks of 1,000,000 numbers rather than 100,000 numbers for the IoT/M2M services, as there is an anticipated high demand for IoT/M2M services.

*Introducing a new number range for Industry beneficiaries'
access service*

We hardly see any justification to introduce such new range, in light that there is an already well-established number range (117xxx) allocated for similar services; directory and call centre services. It is also strange that the new NNP decides that

calling and sending SMS to this new range (8 AB XX) are considered normal calls/SMS and not premium, not to mention that we do not see sufficient justification nor legislation that would grant Access Codes the ability to send SMS similar to Mobile Numbers allocated for licensed Mobile Operators.

Furthermore, article (6) of Instructions for Allocation and Reservation of Number Capacity explicitly states that allocating codes and/or blocks of numbers is only allowed for licensed operators and/or content providers who obtained an approval from Media Commission and for governmental agencies. While beneficiaries of various companies, banks, institutes, corporations and other community entities are neither licensed operators nor approved content providers or governmental entities.

Without prejudice to our view that there is no need for this number range, and should be removed from the NNP, Sending SMS from numbers in such ranges should be prohibited. And calls to such range should be always considered as premium service.

Allocation to be 100,000 number per request instead of 1,000,000 number for Mobile Number Capacity

We urge TRC to keep the allocation of the mobile number capacity as is, i.e., in terms of 1,000,000 numbers per request, given that the introduction of a new number range for IoT/M2M services will make the demand for mobile numbers change in a matter that makes the market a slightly less saturated,

Additionally, the instructions for allocation and reservation of number capacities is adopting a special formula to calculate the utilization of the existing number ranges, making the allocation process a well-supervised operation that wouldn't call for a decrease in the amount of allocation.

Instructions for Allocation and Reservation of Number Capacities

Eligible applicants to number capacity

in article (6) of the instructions for allocation and reservation the eligible parties who can apply to number ranges where defined as the Licensees, service providers

who are licenses by Media Commission and governmental entities, however, TRC has allocated some number capacities (e.g. 117xxx) to parties other than those, including private companies, therefore, this article doesn't reflect the actual status and should be either amended to care for these cases, or otherwise the allocation of numbers to these parties could be violating the instructions.

It's important to mention that the allocation of number capacity to the Service Providers are for providing premium services (Article 6/1), taking this into consideration; the Allocation and Reservation Instructions decided that the new "Industry Beneficiaries" 8ABxx range as Non-Premium, which contradicts the above article, noting that' we urge TRC to abandon this range (8ABXX) from the NNP or at least define it is as a Premium Service Number.

The introduction of Numbering Management System (NMS)

Zain welcomes this new automation process, as well as any other automated process that aims to reduce the need for human intervention and expedite response to applications, however; we see that it's very crucial that TRC should take Licensees feedback on this proposed process prior to configuring it with calculation factors.

The change of the condition of achieving utilization of 90% instead of 80% is not justified

The target utilization of 90% is very high, the ongoing needs of Operators (Mobile ones in particular) for number capacities is continuously increasing, and once the utilization reaches 90% the Operator will not have the luxury of time to wait for allocation of new capacities, we recommend to keep the target utilization lower enough to allow sufficient time to get use of the existing allocated number ranges for the ongoing needs before allocating new ranges/capacities.

Moreover; the target allocation utilization for the IoT/M2M ranges should be lower than 90% enough as the need for number ranges can emerge in big quantities in very short time, and so the time needed for new allocation might hinder the implementation or activation of new products/sales in that regard. We recommend adopting 50% target utilization for the time being until IoT/M2M services become mature enough in the market.




The utilization formula for FBWA

It is necessary to allow FBWA numbers to be quarantined before reusing them, as many of these numbers are used for post-paid services, and so should be set aside for collection purposes before assigning to new customers, therefore; The utilization formula for FBWA should take into consideration that the numbers go to the quarantine period before reusing.

Reuse of Number(s) after customer has ceased the service:

TRC has recognized operators need to reuse the numbers that are already allocated for them, and hence decreased the quarantine period to 4 months instead of 6 months.

We welcome this intention and in fact we urge TRC to decrease it to 2 or less months, this will give more available number capacity for the operators to utilize in light that the remaining number ranges are little, and by the current 6 month quarantine period or the proposed 4-month on the demand will keep rising.

Therefore, we request a quarantine period not more than two (2) months long, in addition to the aforementioned reasons that will allow the rapid reuse of the terminated numbers, and consequently efficient utilization of the allocated number capacities. 

Detailed Comments on the National Numbering Plan:

No.	Article	Zain Comment
1.1 Terms and definitions	Access Codes: it is a short code, generally easy to memorize, usually beginning with 1xx(x) range, or other number (911), which allow end users to access a wide range of telephony services, such as: -Emergency numbers -call-by-call Carrier Selection - National Helpline	Although it is clear in article "2.2 Structure of National Numbering Plan" Industry beneficiaries' access codes are listed under Access Codes. Access Codes definition failed to include the newly designated "Industry beneficiaries' access codes" in its details leaving no justification for designating this new code.
1.1 Terms and definitions	Industry beneficiaries' access codes	We hardly see any justification to introduce such new range for the reasons mentioned in our general comments above. Therefore, we suggest removing this definition from the NNP
2.2 Structure of the National Numbering Plan	Annex (1), 07 prefix, A & B Digits (91)	The note that reads ("910 - 919 Available for expansion") is not correct, as this sub-range is already allocated
2.3 Numbering Capacity for Fixed Geographic Services		We kindly request the TRC to remove the national region prefix (02, 03, 05, 06) from the fixed number capacities, and be replaced by unified prefix for all fixed geographic services

2.4 Numbering Capacities for Mobile Services		The reduction of block-capacities allocation for Mobile network Operators (MNOs) is not necessary or justifiable, much for the reasons stated in our general comments above. We request to revert to the original allocation capacity.
2.4 Numbering Capacities for Mobile Services		We suggest adding this statement to this article: "Allocation will be in blocks of 1,000,000 numbers for Mobile network Operators (MNOs)"
2.9 Internet of Things (IoT) & M2M services		We support a dedicated number range for IoT in order to reduce the demand for mobile numbers> With reference to our comments in the general section realier; we believe it is very crucial to the consistency and continuation of the IoT/M2M service provisioning that the existing number capacities currently in use be the same, i.e, the new capacity be applied only to the new sales (Customers), there are technical limitations and challenges that would make any changes to the existing base not doable. Therefore the new IoT/M2M number range should be made available for new customers. We also urges the TRC to allow for the allocation of numbers in blocks of 1,000,000 numbers rather than 100,000 numbers for the IoT/M2M services, as there is an anticipated high demand for IoT/M2M services.
2.18.4	Carrier pre-selection codes	In last paragraph, the sentence ("Interconnection Guidelines") should be changed to ("Interconnection Instructions")

Detailed Comments on the Instructions for Allocation and Reservation of Number Capacities:

No.	Article	Zain Comments
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Article (7/9)	Other matters that are perceived by TRC as relevant subject to consultation with applicant and others where appropriate.	This article contains a very wide phrase "other matters" making the process of Assessment of Application susceptible to unnecessary delays. For avoidance of doubt, we suggest specifying the matters referred to in this article.
Article (9/3)	The planned activation date is too far ahead	The "Planned activation date is too far ahead" is a very subjective condition that could be used to refuse the application, and could be misinterpreted, we recommend making it equal to the reservation period (12 months)
Article (12/b)	Licenseses shall make all allocations of geographic numbers to subscribers in accordance with the National Numbering Map. Delivery of calls to a geographic Network Termination Point (NTP) is determined by the Network Destination Code (NDC) and Subscriber Number (SN)	With reference to our comment on the geographical number ranges earlier in this response; we kindly request the TRC to remove the national region prefix (02, 03, 05, 06) from the fixed number capacities, and be replaced by unified prefix for all fixed geographic services
Article (14) reuse of Number(s) after a Customer has Ceased the Service		With reference to what is stated in our general comments earlier, we assure on our request that the Quarantine period can be further declined to two months