

URGENT

22 Aug 05

Telecom Regulatory Authority of India,
A-2/14, Safdarjung Enclave, New Delhi-29

Kind attention : Secretary / Advisor [MN] , jsengg@bol.net.in
Fax No 26106118 or
26103294

Sir,

COMMENTS ON CONSULTATION PAPER ON
“ MOBILE NUMBER PORTABILITY “

VOICE comments on the paper are given in the succeeding paragraphs.

We receive far more complaints from mobile subscribers than fixed line users. It was not only the poor service but indifferent attitude of the operators towards subscribers problems which is irritating and the consumer wants to run away but is tied down in absence of number portability.

On approval of CITIZEN CHARTER it was expected that things would improve. But the operators had no remorse in consigning the charter to the dust bin.

Operator's contention that 80% subscribers are pre-paid , hence there is no need to invest in number portability for a handful postpaid subscribers is flawed and reflects their 'no commitment' to the quality of service. All subscribers ,prepaid or post paid , are equal victims of operators indifference.

Only hope for the mobile subscribers is NUMBER PORTABILITY.

The following may be added to VOICE comments on the above subject and placed on the website.

"NCH Data has shown that during the month of June 05 out of total complaints of 2914 ,the complaints from telecom sector were 1164 [39 %] , mostly from mobile subscribers."

Answers to the issues raised in the paper are enclosed.

With regards,

Yours Sincerely,

Col S N Aggarwal[Retd]

VOICE comments on issues for Consultation

1. What is the anticipated impact of number portability on customer satisfaction and increased competition between services and operators?

Service providers have fully exploited the non-availability of number portability by providing poor service, inflated bills and absence of complaint redressal--- and getting away without remorse.

Despite being signatory to CITIZEN CHARTER, no attempt has been made to educate subscribers about the hierarchy for complaint redressal ,through media or monthly bill. Has the charter been consigned to waste paper basket?

Neither service provider , nor their association are interested in the subscriber. Only a few complaints were forwarded to COAI—NOT even one was resolved or replied. Less said is better.

Anticipated impact .

Service providers will attempt to

- A] provide better service to avoid losing a subscriber
- B] try implement CITIZEN charter
- C] attempt to address and resolve customer's complaint
- D] increase/ provide real competition between service providers , attractive tariff plans
- E] Change in the attitude of operators- from indifference to that of customer concern
- F] More satisfied customer.

INCREASING THE SUBSCRIBER BASE WITHOUT ENSURING QUALITY IS TO SCUMB TO THE GREED OF OPERATORS.

2. The following technical options have been discussed in the consultation paper.

Please indicate your preference with reasons:

a. All-Call-Query

- b. Query-On-Release**
- c. Onward Routing (Call Forwarding)**
- d. Call-Drop-Back**
- e. Any other solution**

Though the ideal option will be All-Query method where in CENTRAL DATABASE is the key for the routing, but it is a major exercise involving great effort and finance. Hence to start with the CALL DROP BACK option is most suited to our environment. Effort and finance are not impediments and implementation of the MNP will be possible from the word GO. Database management will be easier and so is the operation.

- 3. In the past, some countries have followed the approach of implementation of a short-term solution, with parallel planning for a long-term solution. Several other countries have opted directly for a long-term solution. The issues associated with either approach are discussed in this paper. Please give your opinion, with reasons, on the path India should adopt.**

Long term solution is the ultimate but the mobile subscribers patience is at the brim and they are crying for immediate relief. Hence the approach of "implementation of short term solution ,with parallel planning for a long term solution " is recommended.

- 4. In case of a centralized database approach, who should be responsible for the setup, ownership, administration, and management of such a database? Should the administration and operation of a centralized database be assigned to a third party duly licensed by the licensor as an other service provider (OSP) on the lines of a clearing-house, or should some other approach be adopted?**

To avoid the blame game between operators, a third party should be assigned the responsibility for the set up, ownership, administration, management and operation of centralized database as other service provider[OSP].

- 5. How should the database updates between different operators be synchronized? Where could the central database be located?**

OSP will coordinate the synchronization and updating of database. Location can be decided between operators / regulator.

6. What should be the level of centralization (metro, circle, national) for a centralized database? Should this be a permanent arrangement, or be subject to later revision?

For true MNP, national level of centralized database is needed. However circle level centralization of database may be ideal , if inter circle movement of subscribers is limited . Any arrangement must be subject to later revision.

7. How should NLDOs and ILDOs handle the routing of calls to support number portability?.

NLDOs and ILDOs will route the calls according to the options implemented for portability.

8. Are the existing interconnection arrangements (such as signaling) between mobile-to-mobile, mobile-to-fixed networks sufficient to achieve number portability, or are any changes required?

Do not visualize need for change. Technical details can be worked later.

9. Are there any technical issues in the portability of services such as SMS, data, voicemail, or fax?

As SMS messages are routed via signaling paths and not over voice circuits, solution for handling SMS traffic for ported numbers will have to be devised.

10. What problems do you foresee with the current National Numbering Plan in implementing number portability that may necessitate the modification of the existing National Numbering Plan?

As the number of customers per series in a given exchange may become lower and the number of customers in that series will be shared by number of exchanges / operators on porting, it is essential that a re-routing number is Fixed which is recognized by all switches. This will have to be uppermost need while deciding the national numbering plan.

11. Should number portability related charges be regulated? If not, then what measures will ensure that the portability charges are not set such as to discourage portability?

To ensure that mobile numbering plan takes off smoothly, in the initial stage the portability charges must be regulated. To be revisited by the regulator to arrive at forbearance.

12. What measures will ensure tariff transparency?

Various tariff plans, different call rates for intra/inter circle calls, from mobile to mobile and mobile to fixed line have created more than required confusion.

To avoid further confusion on MNP implementation, tariff transparency is a must.

As suggested use of recorded announcement at the start of the call OR display of tariff / service information on the screen of the caller will provide transparency and avoid situation of confusion confounded.

13. Considering that the Indian market is a growing market and number portability offers the possibility of attracting customers by an efficient operator, should it be mandated that the cost of the number portability should be absorbed by recipient network?

This is the best solution which will negate the requirement of 'portability tariff regulation' and "confusion on portability charges and associated transparency".

This condition is true competition where the operators will strive to provide the best service to retain / attract customers.

PRAY we reach this stage.

14. Please share any additional information that you might have about number portability implementations in countries and jurisdictions around the world, and what we might learn from these experiences.

None.

However the competition in ILDO market is very intense in UK and the operators Are offering different incentives on calls to different countries and different cities in the same country.

TRANSPARENCY is ensured by announcement of the call rates at the start of the call. And there are different access numbers for calls to different cities of the countries.

15. Give your comments, with reasons, as to when number portability should be introduced in India?

With immediate effect. Operators total effort is concentrated on number growth with little regard for investment in infrastructure and quality of service .

Every operator is indifferent towards subscribers and their problems.

THIS has been amply demonstrated by the fact that NO ATTEMPT TO DEVISE COMPLAINT REDRESSAL SYSTEM HAS BEEN MADE AFTER APPROVAL OF CITIZENS CHARTER.

16. Should MNP be implemented progressively by service area or directly across the nation at one time?

Directly across the country at one time.

17. What will be the effect, if any, on the different aspects of implementation if phased roll-out is adopted?

Phased implementation means NO URGENCY, favouring one set of operators against the other and living with the harassment of other operators. Every one, irrespective of area , wants number portability.

Col S N Aggarwal[Retd]
Telecom Advisor-VOICE