8th March 2013

Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan
Jawahar Lal Nehru Marg, Old Minto Road
New Delhi – 110 002

Kind Attention: **Mr. Sanjeev Banzal**
                        Advisor (NSL)

Subject: **Pre-Consultation Paper on Full Mobile Number Portability**

Dear Sir,

This is with reference to the Pre Consultation Paper dated 20th January 2013 on the above mentioned subject.

TTL has always believed that mobile number portability helps in increasing competition between service providers and acts as a catalyst for the service providers to improve their quality of service and introduce innovative products and services to the customers.

TRAI had ensured that intra circle mobile number portability was implemented and accordingly 80.06 million subscribers (till Jan, 2013) have already availed the facility to change the service provider within the service area.

Going forward, TRAI's current initiative of giving flexibility to mobile subscribers to port out to any other operator in any service area is a welcome step.

Further, as desired by the Authority, Tata Teleservices' point-wise response to the pre-consultation paper is as follows:

1. Inputs / comments of the stakeholders on the most optimum method for implementing Inter-Service area porting out of the three approaches discussed in this paper are requested.

<u>TTL:</u> - There can be two scenarios of inter-service area porting:

- **Porting of subscriber to any other service area within the same MNP zone**: In this scenario, porting can take place with the existing infrastructure with some changes in the configurations. However, to ensure that there is no fraud and the same subscriber has not requested a porting in another service area also, connectivity between both the Mobile Number Portability operator (MNPOs) is mandatory.
- **Porting of subscriber to any other service area of the other MNP zone:** TTL suggests that Approach (1), where the Recipient Operator forwards the porting requests to the MNP service Provider of his zone, is the most optimum solution to implement full mobile number portability. This option has an obvious advantage as it would be just extention of existing process. Currently also, the Recipient operator is connected to its zone's MNPO only and therefore there would not be much changes in the operator's processes.

Further, for a pan India MNP, both MNPOs would be required to synchronize their databases. This will enable them for a better implementation of full MNP as the Recipient operator needs only to send the Porting request to its own Zone's MNPO (say MNPO1) through its existing connectivity. MNPO1, in turn would forward the request, to the other Zone's MNPO (MNPO2). This would also ensure cross-checking if there is a fraud or two simultaneous requests are made by the same subscriber in two different circles of different zones. The interconnection

between both the MNPOs will help in performing all validations for the porting requests received at either of the MNPO zones and ensure smooth porting of the subscribers.

2. Inputs may also be provided on amendments required in the existing license conditions of the MNP service license, relating to scope of work, entry fee, license fee, exclusivity period etc.

TTL: - We recommend that the license of MNPO should be amended whereby both MNPO servers need to be inter-connected which will require the connectivity of the databases of the two MNPOs, thus ensuring synchronization between the two MNPOs databases. The MNPO license should be on non-exclusive basis.

3. Comments may be provided on issues related to generation of UPC by a roaming subscriber outside his service area, including generation of UPC for the subscriber desiring to/from porting in J&K service area.

TTL: - Customer should be able to generate UPC code from any location. No major implementation issue would be involved. However, the billing would be as per the subscriber's roaming tariff.

4. Comments may be provided on mechanism to be adopted for routing of calls if the number has undergone inter-service area porting.

TTL: - Routing of calls can be done using LRN only. Therefore since all calls to both ported and non-ported subscribers are routed through LRN, it is a technical challenge to play different announcement for ported subscribers and for STD calls. Further, this would have impact on customer experience also. Subscriber having local calling facility only would not be able to call a local number which has ported to another service area and the call would get disconnected.

Subscriber calling B number who has forwarded to C number which is ported to inter-circle – in this scenario, as of today National call forward is not allowed and this may lead to customer complaints. In case this is allowed then STD call is applicable. For this all Operators, including BSNL and MTNL need to accept call forward nationally and need amendment in all interconnect agreements of the operators.

5. As the present regulations are formulated for porting of mobile numbers within service area, inputs may be provided regarding modifications required in the MNP regulations.

TTL: - In reference to the 6th amendment of TRAI's Telecom Consumers Protection Regualtions, 2012 regarding de-activation and reactivation of mobile numbers, and the fact that the numbers disconnected on Negative verification or on recommendation of LEA agencies, a reactivation cannot be done. Therefore we suggest to keep a uniform process to return number to original number holder on the 16th day from disconnection date. MNPO should broadcast the number return on 16th day from the date of disconnection. Further, in view of the numbering resource crunch that the industry is facing , holding of disconnected ported number by the recipient operator for 90 days is not customer and industry friendly process.

Therefore, keeping a standard protocol, we propose to return number on 16th day from the date of disconnection in the recipient operator's network.

6. Minimum Possible testing scenarios covering the various possibilities of porting.

TTL: While implementing intra-service area mobile number porting, the industry had conducted a very exhaustive testing of all possible call scenarios.

We suggest only the following additional test scenarios for national mobile porting implementation:

Call Scenario	Voice	SMS	Data
A subscriber having local only profile calling to subs.B who is ported inter-circle (e.g. Subscriber in Delhi having local calling profile calling to a Delhi subscriber ported in Mumbai) - This is to check call barring	Yes	Yes	Yes
A subscriber having NLD calling profile calling to subs.B who is ported inter-circle (e.g. Subscriber in Delhi having NLD calling profile calling to a Delhi subscriber ported in Mumbai) - This will help in verifying NLD call charges	Yes	Yes	Yes
Subscriber ported out in inter-circle MNP zone receiving a incoming call from Home operator (Incoming call to Delhi subscriber ported in to Mumbai Docomo receiving a incoming call from DELHI Home operator)	Yes	Yes	
Subscriber ported out in inter-circle MNP zone receiving a incoming call from other operator(Incoming call to Delhi subscriber ported in to Mumbai Docomo receiving a incoming call from DELHI other operator)	Yes	Yes	
Subscriber ported out in inter-circle MNP zone receiving a incoming call from Home operator (Incoming call to Delhi subscriber ported in to Mumbai Docomo receiving a incoming call from Mumbai Docomo operator)	Yes	Yes	
Subscriber ported out in inter-circle MNP zone receiving a incoming call from other operator(Incoming call to Delhi subscriber ported in to Mumbai Docomo receiving a incoming call from Mumbai other operator)	Yes	Yes	
Other service Features			
Call forwarding – Subscriber calling B number who is forwarded to ported out number in same circle	Yes		
Call forwarding – Subscriber calling B number who is forwarded to ported out number in INTERCIRCLE	Yes		
Call forwarding Registration – Subscriber doing a call forward registration to a number ported within circle	Yes		
Call forwarding Registration – Subscriber doing a call forward registration to a number ported INTER circle	Yes		

7. Comment on any other relevant point related to full number portability may be provided

TTL: No comments.

Thanking you and assuring you of our best attention always

Yours sincerely,

Anand Dalal
Senior Vice President – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
For Tata Teleservices (Maharashtra) Limited