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**Joint Industry Response on the Draft Telecommunication  
Mobile Number Portability (Sixth Amendment) Regulations, 2015**

Our joint industry submissions to the Draft Telecommunication Mobile Number Portability (Sixth Amendment) Regulations, 2015 are as highlighted below:

**1) Timelines for the Implementation of Full MNP in India and the Industry Project Plan:**

- a) As per clause 1. of the draft Regulation “ ***1. (1) These regulations may be called the Telecommunication Mobile Number Portability (Sixth Amendment) Regulations, 2015 (2) They shall come into force on the 3rd day of May, 2015***”.
- b) In this regard, we would like to submit that currently most of the IT systems are completely dependent upon number series to identify circle of the subscriber. With National MNP operators would need to completely re-design their current system for discovery, service guiding and mediation.
- c) With our experience of the earlier implementation of MNP, all are aware of the complexities involved particularly the immense amount of co-ordination required by all stakeholders. Given the scale of this exercise it is important to undertake implementation in a phased manner with suitable check points for review and correction. A high-level suggested Project Plan and timelines for implementation of National Mobile Number Portability in all national level IT application systems and network systems for a typical operator is highlighted **in document enclosed as Annexure- A.**
- d) As highlighted in this Project Plan document, we would like to bring to your notice that the timelines for such a large implementation should be well spaced so as to avoid any negative impact on critical services. Our member operators have already completed the planning of the changes to be made in their systems for implementation of full MNP. They have already initiated the Network related changes required for Implementation. However, keeping in mind the size of networks and the work required to be done, we would like to submit that any timelines shorter **than 8 months** is not practical.
- e) **Further, draft Interface Specifications (Technical Specs), pertaining to Full National Number Portability, have been shared by the MNPO’s with our member operators.** However, our members have been informed by the MNPO’s that these specifications are subject to further changes based on final regulation issued by the Authority. In this regard, we would like to submit that most of the IT related changes to be made by our members are based on the Interface Specifications to be provided by the MNPO’s so we would like to submit that there should be fixed date by when our members could get the final specifications.
- f) **In light of the above, we would like to recommend that the completion date for the Implementation of Full MNP be 8 months from the release of the final Regulations by TRAI.**
- g) **Accordingly, we request TRAI to kindly modify the date of the compliance to the said Regulation i.e. “May 3, 2015”.**

## **2) Reduction in timelines for Number return process:**

- a) We agree with the TRAI that the timeline for number return needs to be reduced from 90 to 60 days.

## **3) Improving of existing process of handling non-payment disconnections:**

- a) With regard to the issue of improving of existing process of handling non-payment disconnections, we would like to make following submissions:
  - i) We agree with TRAI that Donor operator (DO) needs to intimate to the Recipient operator (RO) about the payment received so that RO does not disconnect such mobile number and customer is not put to any inconvenience after having cleared the outstanding.
  - ii) We have also observed that there is genuine case where the customer has made payment but not been able to produce evidence within the given time or in certain case made good the payment a few days after the stipulated time. It is not in the interest of the customer to disconnect these numbers. Based on the statistics of such instances, we propose that the over-all NPD window may be increased to 30 days. This increase will also provide reasonable time to the Full-MNP customer to make payment notwithstanding the physical re-location. Such a provision will primarily help customers who are either roaming / not in country or town. It needs to be kept in mind that as per the existing mandate once disconnected, a customer cannot be reactivated with RO (as there is no such provision) or with DO (as number is returned after 90 days of disconnection).
  - iii) Therefore in case DO receives payment within 30days' notice period given by the RO to the subscriber, the DO may intimate to the RO about the same so that RO does not disconnect such mobile number. However, the current procedure that once the subscriber has made the payment, he is required to intimate the same to the RO should continue. The DO, on receipt of payment, will additionally inform the same to the RO. However, the primary liability of informing the payment should be on the customer. The RO shall act upon the confirmation received either from the consumer or from the DO.
  - iv) The disconnection trigger will be made by the RO on 31<sup>st</sup> day from the date of notice by MNPO to RO.
  - v) Further, there have been cases wherein the donor operator has raised the issue of not receiving the payment in case of outstanding dues after a long period. In this regard, it is submitted that once the RO receives the receipt from the customer and communicates the same to the DO and if DO has any issue related to the outstanding dues; he should raise the same within 15 days from the date of communication from RO. In case, DO does not raise the same within the stipulated period, it should be deemed that the DO has received the payment and has no further issue with the subscriber regarding payment of outstanding dues.
  - vi) It has been our experience that both the MNPOs have adopted different processes in the treatment of NPD cases. One MNPO notifies a 'Deemed Disconnection' on the 15<sup>th</sup> day (in case of no response from the RO) and the other MNPO keeps the transaction open and keeps on waiting for the response from the RO.

- vii) We propose that both MNPOs should follow the same process and we recommend that the RO should positively respond within the stipulated timeline and the MNPOs should not provide a 'Deemed Disconnection' message.
- viii) Our members have also experienced cases where the DO had raised a NPD request; however, the customer was still permitted to port out again to another operator. Therefore we propose that for NPD cases, in case of no response from the RO or a 'disconnected' response from the RO, the MNPO should not entertain any further porting request. This is in the interest of the DO so as to protect the outstanding amount from becoming a bad debt.
- ix) The existing regulation does not have any time limit for raising NPD and therefore any DO can raise an NPD at any given point in time. Delayed NPD requests tend to cause customer inconvenience. Therefore, we propose some amount of discipline in this process and we request the amendment to the regulation to mandate NPD to be raised within 90 days of the Deactivation date.

#### **4) Changes in existing benchmark**

- a) Port-in (Activation by RO) & Port-out (Deactivation by DO) TAT is 100% within 2 hours of receipt of instructions from MCH:
  - i) As the complete MNP ecosystem is very complex and involves integration between various applications / systems, any fluctuation / outages within these linkages, lead to some cases exceeding the 2 hour TAT.
  - ii) It is also pertinent to highlight that MNP activation/deactivation window is in the night, when generally all outages/up gradations of network and IT systems are done for planned and unplanned events. These outages/up gradations are to be done in this low utilization time period to avoid risk of doing the same in daytime when networks are actively being used by customers. Thus, it is a rather forced decision on an operator to go for outages, which may have impact on 2 hour MNP window. Therefore, it should not be treated as non-compliance or taken up for financial disincentive since these events can't be avoided; and operators shouldn't be disincentivized for regular maintenance of their telecom network and IT systems.
  - iii) With further addition of complexity from inter service area porting, adherence to 100% TAT will become more challenging, hence we recommend that this TAT should be revised to include slabs such as:
    - a. >95% in 2 hours TAT
    - b. >98% in 3 hours TAT

#### **5) Handling of ownership related issues:**

- a) TRAI has sought comments of the stakeholders on the steps that could be taken for the handling of the ownership issues such as an undertaking from the subscriber that the

subscriber is owner of the number and in future if it is found that the information given by the subscriber is incorrect, the number is liable to be disconnected.

- b) In this regard, we would like to submit that as per the terms and conditions highlighted on the Customer Acquisition Form (CAF), currently being used for the subscriber verification process, in case the information furnished by the subscriber is incorrect, the number is in any case liable to be disconnected.
- c) Hence, we would like to submit that there is no need for any additional undertaking to be taken from customer.
- d) However, if the Authority still feels the necessity of taking specific undertaking from the subscribers at the time of porting regarding the ownership of the mobile number, we propose that such undertaking should be made part of the CAF itself which will ease the process of obtaining undertaking for ownership.

**Industry Submission Summary:**

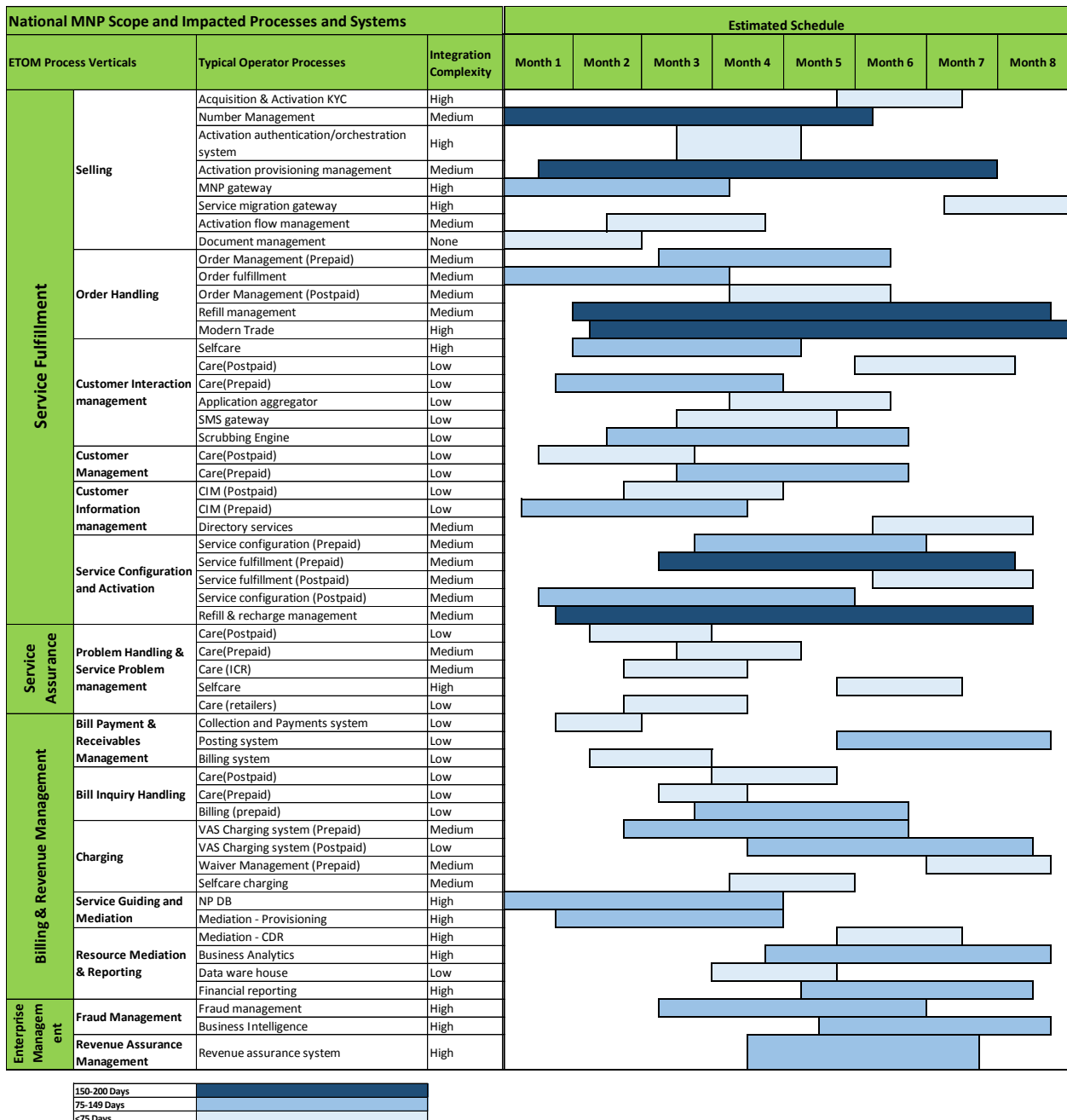
- 1) **The completion date for the Implementation of Full MNP in India to be 8 months from the release of the final Regulations by TRAI. Accordingly, TRAI may kindly modify the date of the compliance to the said Regulation i.e. "May 3, 2015".**
- 2) **TRAI to kindly prescribe for the 30 days' notice period to be given by the RO to the subscriber for the payment of the dues to the DO.**
- 3) **With regard to the handling of the ownership related issues, there is no need to take the undertaking from the customer as the current CAF already has provision for the customer liability for the correct information.**
- 4) **We also recommend that the Port-in (Activation by RO) & Port-out (Deactivation by DO) TAT should be revised to include slabs such as:**
  - a. **>95% in 2 hours TAT**
  - b. **>98% in 3 hours TAT**

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## Suggested Project Plan for Implementation of National MNP

### High level Impact Analysis / Activity Chart for Network & IT systems for National MNP:

1. The new regulation on National MNP would enable subscribers to move from one operator to another in the different circle or move within the same operator in one circle to another circle without having to change his mobile number.
2. Currently, most of the IT systems are completely dependent upon number series to identify circle of the subscriber. With National MNP, we need to completely re-design our current system for discovery, service guiding and mediation.
3. High level timelines for implementation of National Mobile Number Portability in all national level IT application systems is as given below:



4. In addition to the above multiple partner, hub level & circle level applications would also be impacted which are currently under impact analysis and assessment.

## List of Network Activities for Implementation of National MNP

Activities involved for pre testing and Network readiness for National MNP implementation	
<b>Major Activity: Solution Preparation and Development of feature</b>	
1	Impact Analysis on all Call flows
2	Freezing the solution including the Call flows
3	Planning & Dimensioning of Nodes and Interfaces including third party
4	Design for Migration Strategy
5	Development of features for supporting National MNP
6	Multi Vendor Testing of the feature
7	High Level Design for FNI Circle
<b>Major Activity: Pilot Testing in One Circle</b>	
1	Dialing Plan implementation
2	Analysis of existing MSS, HLR ,IN and STP database for different call flows
3	Preparation of new database based on agreed solution for pilot nodes , Solution may vary as per DOT Inputs for a) Dialing Pattern b) STD Barring c) Call Forwarding d) Announcement
4	Loading of new database in pilot nodes
5	Testing of all call flows in pilot nodes
6	CDR collection for Pre and Postpaid calls and supporting RA for validation
7	Based on different call flow testing and RA feedback, revisit the solution and finalization of Solution
<b>Major Activity: Mass rollout</b>	
1	Taking dump from exiting MSS , IN , VAS nodes and conversion to tabular format
2	Analysis of existing MSS database for different call flows
3	Preparation of new database based on agreed solution for all other node
4	Loading of new database in all other node
5	Testing of all call flows in all nodes
6	CDR collection and supporting RA for validation
7	Preparation of new database based on agreed solution for HLR
8	Loading of new database in all HLR
9	Preparation of new database based on agreed solution for STP
10	Loading of new database in all STP
11	Preparation of new database based on agreed solution for IN
12	Loading of new database in all IN systems
13	Preparation of new database based on agreed solution for VAS
14	Loading of new database in all VAS systems