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Vilnius

TO:

TELECOM REGULATORY AUTHORITY OF INDIA

E-mail: fa@tra.gov.in.

COUNTER COMMENTS ON CONSULTATION PAPER NO. 02/2019 OF TELECOM REGULATORY AUTHORITY OF INDIA "UPDATED CONSULTATION PAPER ON REVIEW OF PER PORT TRANSACTION CHARGE AND OTHER RELATED CHARGES FOR MOBILE NUMBER PORTABILITY" DATED 1ST OF APRIL, 2019

After taking in respect represented comments and positions of the involved parties, we do express our intension to provide our additional (further) comments for the consultation.

We do express our agreement with the proposal of the CONSUMER PROTECTION ASSOCIATION HIMMATNAGAR DIST.: SABARKANTHA GUJARAT (hereinafter – Proposal) in accordance with suggested prices and cost calculation methodology which is strongly compatible with our company's experience, competence and worldwide spread business activity. The goals, mission and activities of ours, just the same way as it is projected in Proposal are strongly based on the best European and International (Worldwide) practice of mobile number portability services provisioning which in the case of our practise spreads out of the borders of the European Union through such states as Ivory Coast, Russia, Moldova, Georgia, Azerbaijan, Kazakhstan, Senegal, Tunis, El Salvador.

Moreover, offering for the Indian market the best what is created in the market of telecommunications, we would also express intention to highlight the importance of the proposal of the Association of the provisioning mobile number portability services for subscribers on the lowest, regulated or nil price, as it is provided in most countries worldwide counting on fair and honest attitude towards the users of services, what also is one of the major priorities of our company.

Taking in to account that reducing of the 'Per port transaction charge' should cover the real costs of the number portability service provider and avoid risks for their business it is also needed to pay attention and highlight some importance on particular comments, provided by the participants of this consultation.

It is needed strongly to emphasise that reduction of the mobile number portability service cost, risks in this field and the possibility of keeping the prices on the level proposed by TRAI is a question of the whole spectrum of remedies which are worth to be considered and which are carrying not only practical objective backgrounds but also might touch laws and other legal regulatory norms:

Firstly, it should be taken into consideration, that for keeping mobile portability service provider business profitable and assure the risks reduction for the business the non-payments to mobile portability service provider and bad debts avoiding mechanisms should be included into the regulation of the number portability. Legal regulation of these aspects *a priori* would set substantial stability business management and development what definitely would also bring beneficial possibilities for the users of services. Business conditions set by law and properly regulated with imperative legal norms do always create an efficient background for objectively forecasted and more clear business opportunities and capability to meet clients interest in the most budget oriented way.

Secondly, it is also supported by us and our transversal business experience the proposal to permit the mobile portability service provider to utilise non-profitable mobile number portability system components, such as 'Dipping system' for provisioning of non-regulated commercial services for other users. Still, despite of meeting and greeting this proposal, it has to be expressed from our side that solving such questions in a detailed way also should be the activity of legal manner. From our point of view, demands, obligations, rights, permitted actions, responsibilities should be also stated in the legal regulation of the number portability.

Self-explanatory such regulation could be handled by various legitimate and competitive governmental or other trust worth sector (institutions) of India. Such legal regulation would be not only the safe point for services developers but also a guiding path for future stability in number portability section of the telecommunication market.

Proceeding the further survey of the Proposal, it is essentially required to take into account the facts of the rapid vital expeditious changes in the telecommunication market in the last of the ten years.

Undoubtedly and without a need of a separate proof it is obviously clear that during the latest period the prices of the information related technologies and services decreased dramatically, due to different and numerous reasons.

Rapid growth of IT technology and related services is one of the basic background of the essential change in the IT and telecommunication market which assured a spectacular jump in possibilities to provide for the users not only of various different states but also of various continents to experience the benefits of choosing in an unlimited way telecommunication products and services. This undoubtedly empowers to expand satisfaction not only of every day communicational needs but also the needs of various private and governmental business branches, cooperation between private and public sectors.

Indomitably the above mentioned needs are also met by the people and business of India. And the fact that for the given moment ten years from issuing of licence for mobile number service provisioning have been passed, it is impartially to suggest that for the Indian market the new



open tender for licence for mobile number portability service provisioning should be opened because this way the competitive, cost based prices for number portability services would be assured.

Additionally, it would be beneficial to point the situation that after such a long period it would be the fairest approach towards the customers if all the possibilities of number portability services suppliers could be examined, explored and the most appropriate decision towards the best quality would be made.

So, in consideration of all what was represented and explained also taking into account all stated above, we are ready to offer all the best of our practice, experience and possibilities to supply for the customers of India the best quality services for the most approachable price.

For this purpose, we are completely ready to participate and represent our possibilities and offers in the open house discussion related to this consultation when it will be organised by TRAI and opened for the Number Portability service providers.

Yours faithfully,
On Behalf General Manager



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