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Vilnius

**To:****Telecom Regulatory Authority of India**

Mr. Shri S.T. Abbas,

Advisor (Networks, Spectrum and Licensing),

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**THE COMMENTS ON DRAFT TELECOMMUNICATION MOBILE NUMBER PORTABILITY  
(SEVENTH AMENDMENT) REGULATIONS, 2018**

Dear Mr. Shri S.T. Abbas

Mediafon Datapro, UAB is glad of the opportunity to provide comments on DRAFT TELECOMMUNICATION MOBILE NUMBER PORTABILITY (SEVENTH AMENDMENT) REGULATIONS, 2018. After analysis of the provided draft regulation document, we would like to highlight the following topics:

1. The proposed solution for implementing Unique Porting Code functionality with online query response mechanism for provisioning important information before porting by Donor operator, *looks as the very positive change, it should reduce the number of Donor rejections during porting process, should increase number of successful porting and create the true background to reduce porting time to few hours level;*
2. Commenting the provisioning of Unique Porting Code (hereinafter - UPC) by SMS, and on the base of our experience, we would like to pay your attention that this mechanism must be upgraded by the *feature, allowing strict control of SMS delivering/ SMS "tracking" to subscriber end- point. It will help to omit the cases when Donor operator delays/ fails the delivery of SMS's with UPC with no clear and true reasons, and, correspondingly, will positive influent porting rates and satisfaction of subscribers;*
3. In the document there is no clearly stated how MNPSM SMS's should be delivered to the subscriber. Now in many places of the document it is stated as "through SMS". We suggest replacing of statement "through SMS" to more specific "by SMS through Donor operator's Short Message Service" in all document, add to the document the relevant basic



intercommunications scheme and define SMS cost allocation model. We hope that during preparation of SMS intercommunication scheme and definition of SMS cost allocation model, the most efficient SMS delivery method will be found, which *allows to provide SMS delivery in most cost-efficient way and reduce number portability process costs for all process participants*. Moreover, *detailed definition of the SMS intercommunication scheme and SMS cost allocation model allows to clearly know responsibilities and costs of SMS delivery and allows Regulatory Authority to control the SMS delivery process and relevant costs*;

4. We want to propose to add restrictions for Donor operator in cases when Donor operator is not responding to MNPSP request for checking information (for any reject reasons) within X hours. *We suggest after passing those X hours for the specific porting process, Donor operator shall miss any possibilities to stop/postpone/reject this particular porting process and following execution of this porting process shall be finalized as "accepted by Donor"*. In case Donor operator cannot respond to MNPSP request for checking information on Donor side immediately, responding to MNPSP request for checking information on Donor side, shall always and clearly indicate the time in hours (X) when Donor response will be provided and after that subscriber will be informed by MNPSP that delivery of Unique Porting Code is delayed due to technical reason and Unique Porting Code be delivered within X hours. The implementation of this model will help to omit the cases when Donor operator delays or fails to provide access and the required information to MNPSP with no clear and true reasons, and, correspondingly, *will positive influence porting rates and satisfaction of subscribers*;
5. For the cases relevant to corporate mobile number(s), we suggest to define the format and maximum size of the scanned copy of authorization letter file and time for how long this file should be stored by MNPSP and when it can be destroyed or transferred to archive. The standardization of the file size and format as well as definition of file storing time creates possibility to make optimal dimensioning of the MNPSP database size and network capacity, *allows implementation of the automatic data checking features in the number portability process, reduces MNPSP costs and number portability process time*.

Yours faithfully,  
General Manager



Mr. Igor Isakov

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