

ADITYA BIRLA



IDEA Cellular

7th March, 2013

Shri Sanjeev Banzal,
Advisor (NSL)
The Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Old Minto Road,
New Delhi 110002

Idea Cellular response to the TRAI Pre-Consultation Paper on "Full Mobile Number Portability"

Sir,

This is with reference to the Authority's invitation for comments on the above-mentioned Pre-consultation. In this regard, you may note that Idea Cellular endorses all the views expressed by COAI on this issue.

At the outset, it is submitted that the Industry has recently implemented the Mobile Number Portability on intra circle basis across the country. The MNP implementation was a complex exercise considering the number of MNP service providers, subscribers, service providers and also the number of service areas involved.

Admittedly huge amount of capex and opex has been spent on such implementation. Idea fully supported this implementation as it was an essential part of any telecom landscape. On the other hand, the MNP for inter circle falls in different dimension, since the users of same are likely to be few and only those who migrate from one service area to another. The Regulator needs to consider the cost of such implementation and the benefit which would be derived out of such an implementation. While eventually one may argue that inter circle porting is desirable, whether this should to be done at this juncture is the moot question. We recommend that TRAI debate this important query before it proceeds on taking final decision in this matter. You would also appreciate that Industry is passing through a stressful financial conditions and any additional costs would lead to further pressures. Hence a prudent implementation and execution time frame is essential before the Industry commences this activity.

Without prejudice to the above, we have the following comments:

It is well-known now that implementation of Intra-Circle Mobile Number Portability involved heavy investments from the Industry in terms of money, resources, and time. The entire project was interspersed with complexities that are now well- documented and known. However, in context of all the above:

We would like to submit that Idea Cellular has in the past always supported introduction of consumer friendly initiatives. However, on this particular subject, we strongly feel that the Authority needs to allow the mobile market to evolve further before making a move to introduce something as radical as "Full Mobile Number Portability". We further believe that Intra-Circle Mobile Number Portability, though not a substitute for "Full Mobile Number Portability" sufficiently addresses the larger need of the telecom consumers, and any move to



bring it in at this juncture would be a little early and one that adds an unneeded extra element of cost to the already strained financials of the Mobile Industry.

Notwithstanding the above, our responses to the various queries raised in the Consultation are as follows:

Q1: Inputs / comments of the stakeholders on the most optimum method for implementing the Inter-Service area porting out of the three approaches discussed in this paper are requested.

Idea Cellular's Response:

Idea Cellular strongly supports the Approach 1 (Recipient Operator forwards the porting request to the MNP service provider of his zone)with respect to the implementation of inter-service area MNP

- a) This approach requires minimal or no changes at each of the Telco's MNP Gateway. It is hence the least disruptive approach from a TSP / Operator' perspective.
- b) Further, changes will only be required at the 2 MCHs with regard database management / verification, etc implying thereby that implementation can be faster as the involvement from operator's end can be minimal.
- c) However, the porting timelines of 7 days/10 days for J&K, Assam & NE as stipulated by TRAI in case of the inter circle porting across two zones should be reviewed.
- d) Security and related synchronization will need resolution.
- e) Most critically this process would closely mirror the current processes being followed at customer and service providers end and hence would be a customer as well as service provider friendly approach.

Q2: 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.

Idea Cellular's Response:

- a) In our suggested approach-1 no changes will be required in the terms of our agreements with NPG vendors.
- b) However, amendments will be required in the existing license conditions of the two MNPOs in order to incorporate the need to establish connectivity with each other.

Q3. 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 the J&K service area.

Idea Cellular's Response:

- a) We would like to submit that there are no technical issues as regards generation of SMS UPC by a roaming subscriber outside his service area.

- b) As regards the query specific to the J&K circle, it is suggested that the subscribers can call 1900 for generating the UPC as per the system currently in place.
- c) Further, it may be recalled that In J&K, only Post-paid subscribers are allowed to out-roam. Hence it would be possible for them to send an SMS to 1900 and generate UPC. Currently, roaming is not allowed for Pre-paid J&K customers.
- d) On similar lines, only Post-paid customers of other circles are allowed to roam into J&K circle. In case of such customers, UPC may be generated via SMS.

Q4. Comments may be provided on the mechanism to be adopted for routing of calls if the number has undergone inter-service area porting.

Idea Cellular's Response:

- a) Post Inter-Circle MNP, there will be a need to allow all calls to inter circle subscribers without "Zero" Prefix also (in addition to 0 + MSISDN and +91 + MSISDN formats) dialing, though this may further require numbering/ licensing issues to be addressed. Hence it is unlikely that there will be a scenario where subscriber's call to a inter circle ported subscriber will not mature. Thus, we see no need for playing any announcement.
- b) Further, in case there is requirement to play pre-call announcements, doing this perpetually will irritate the calling customers. Even there is requirement of playing such announcements for a shorter initial period e.g. for a month, the capability to play announcements for making the calling party aware of the called subscriber having ported out to inter-circle is fraught with technical challenges. It will lead to delay in call setup time, load on announcement servers, increase in digit analysis in the MSS nodes and as a result of all this dissatisfaction to the calling subscribers. This is not recommended, as there seems no cost benefit.
- c) Here it must be recalled that a similar issue also came to the fore when Intra-Circled MNP was launched, as operators generally had different charging rates for on-net and off-net calls . But people got used to it and there were hardly any complaints. Similarly, people will get to know the shifting of the particular subscriber they are acquainted with and there is no need to put unnecessary huge burden and costs on the network for playing announcements without any compensation based on the work done principle.

Q5. As the present regulations are formulated for porting of mobile numbers within service areas, inputs may be provided regarding modifications required in the MNP regulations.

Idea Cellular's Response:

- a) The 7 days timeframe envisaged for completion of porting process will not be possible, keeping in view the recently implemented new activation process, the new documents, address proof required from the customer immediately upon his shifting. It may be noted that the additional step of CAF verification by the TSP's activation officer also requires additional time and has an impact on the overall timeframe.
- b) Validation of the minimum 90 days requirement both from the time of activation & last Porting should be done by the DNO only. Currently MCHs reject the porting request in case the number has not completed 90 days from the last porting and as a result

operators are unable to port in numbers from the operators which have closed down their operations.

- c) It is submitted that no financial disincentives should be imposed in the event of the level of compliance being 95% on all MNP regulations. For eg., if the service provider has complied 95% of requests within 2 hours of instructions from MNP Service Provider.
- d) The necessity of "Non payment disconnect request" may be reviewed, as this process is completely between operators and was put in place to safeguard operator's revenues however, the adoption of the process has not turned out as had been envisaged.
- e) Rejections based on "Contractual obligation" are still a cause of concern and further clarity should be brought in the modified regulations.
- f) Regulations with respect to "Number return process" also need to be expanded to bring in more clarity and drive better compliance.
- g) Operators should be allowed to retain the Porting out customers and sufficient time should be given to the DNO for the same.
- h) The system/ process for "SMS based Port request cancelation" by the customer should be implemented on priority

Q6. Minimum Possible testing scenarios covering the various possibilities of porting.

Idea Cellular's Response:

- a) Since Intra Circle Porting is already in place , testing methodology should be designed in such a manner that too much time doesn't need to be spent. Sample testing sheet is attached.
- b) Further, it is strongly recommended that no charges are levied on operators for such testing.
- c) A sample testing sheet is attached herewith for your kind reference.

Q7. Comment on any other relevant point related to full number portability may be provided

Idea Cellular's Response:

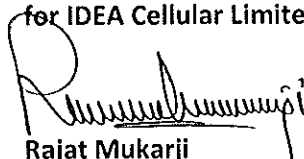
It is advisable that the TRAI look at a separate process to handle porting requests involving the same operator across different circles. E.g. Idea Delhi Subscriber wanting to move to Idea MP

We are confident that the Authority will give due-consideration to our afore-mentioned comments before formalizing any further opinion on the issue.

Thanking You

Yours faithfully,

for IDEA Cellular Limited



Rajat Mukarji
Chief Corporate Affairs Officer

Encl: A/a

TESTING SCENARIOS

1	Call	Cg Subscriber	Cd Subscriber	Required	Local/STD	Postpaid	Prepaid	Remarks
		Normal	Normal	N		N	N	
		Normal	Inter Circle PO	Y	STD Call	Y	Y	
		Normal	Inter Circle PI to ICL	Y	Local Call	Y	Y	
		Normal	Inter Circle Cross Ported	Y	STD Call	Y	Y	
		Normal	Inter Circle PI to e.g. VF	Y	Local Call	Y	Y	
		Inter Circle PI to ICL	Normal Local	Y	Local Call	Y	Y	
		Inter Circle PI to ICL	Normal STD	Y	STD Call	Y	Y	
		Inter Circle PI to ICL	Inter Circle PO	Y	STD Call	Y	Y	
		Inter Circle PI to ICL	Inter Circle PI to ICL	Y	Local Call	Y	Y	
		Inter Circle PI to ICL	Inter Circle Cross Ported	Y	STD Call	Y	Y	
		Inter Circle PI to ICL	Inter Circle PI to e.g. VF	Y	Local Call	Y	Y	
		Normal Roamer	Normal	N		N	N	
		Normal Roamer	Inter Circle PO	Y	Roaming Call	Y	Y	
		Normal Roamer	Inter Circle PI to ICL	Y	Roaming Call	Y	Y	
		Normal Roamer	Inter Circle Cross Ported	Y	Roaming Call	Y	Y	
		Normal Roamer	Inter Circle PI to e.g. VF	Y	Roaming Call	Y	Y	
		Normal Roamer	Inter Circle PO Roamer to Local Circle	Y	Roaming Call	Y	Y	e.g. B-No. ICL DL -->PO to ICL WB and Roaming in ICL MB
		Normal Roamer	Inter Circle PO Roamer to STD Circle	Y	Roaming Call	Y	Y	e.g. B-No. ICL DL -->PO to ICL WB and Roaming in ICL UPW
		Normal Roamer	Inter Circle PI to ICL in Roaming	Y	Roaming Call	Y	Y	e.g. B-No. ICL DL -->PI to ICL MB and Roaming in ICL UPW
		Normal Roamer	Inter Circle PI to e.g. VF in Roaming	Y	Roaming Call	Y	Y	e.g. B-No. ICL DL -->PI to VF MB and Roaming in VF UPW
		Normal Roamer	Inter Circle PO Roamer to Local Circle	Y	Roaming Call	Y	Y	e.g. B-No. ICL DL -->PO to ICL WB and Roaming in ICL MB
		Normal Roamer	Inter Circle PO Roamer to STD Circle	Y	Roaming Call	Y	Y	e.g. B-No. ICL DL -->PO to ICL WB and Roaming in ICL UPW
		Normal Roamer	Inter Circle PI to ICL in Roaming	Y	Roaming Call	Y	Y	e.g. B-No. ICL DL -->PI to ICL MB and Roaming in ICL UPW
		Normal Roamer	Inter Circle PI to e.g. VF in Roaming	Y	Roaming Call	Y	Y	e.g. B-No. ICL DL -->PI to VF MB and Roaming in VF UPW
		ICL Inter Circle Ported Roamer	Normal Local	Y	Roaming Call	Y	Y	e.g. ICL DL -->PI to ICL WB and Roaming in ICL MB
		ICL Inter Circle Ported Roamer	Normal STD	Y	Roaming Call	Y	Y	e.g. ICL DL -->PI to ICL WB and Roaming in ICL MB
		ICL Inter Circle Ported Roamer	Inter Circle PO	Y	Roaming Call	Y	Y	e.g. ICL DL -->PI to ICL WB and Roaming in ICL MB

TESTING SCENARIOS

	Cg Subscriber	Cd Subscriber	Required	Local/STD	Postpaid	Prepaid	Remarks
	ICL Inter Circle Ported Roamer	Inter Circle PI to ICL	Y	Roaming Call	Y	Y	e.g. ICL DL -->PI to ICL WB and Roaming in ICL MB
	ICL Inter Circle Ported Roamer	Inter Circle Cross Ported	Y	Roaming Call	Y	Y	e.g. ICL DL -->PI to ICL WB and Roaming in ICL MB
	ICL Inter Circle Ported Roamer	Inter Circle PI to e.g. VF	Y	Roaming Call	Y	Y	e.g. ICL DL -->PI to ICL WB and Roaming in ICL MB
	ICL Inter Circle Ported Roamer	Inter Circle PO Roamer to Local Circle	Y	Roaming Call	Y	A No. Y	e.g. B-No. ICL DL -->PO to ICL WB and Roaming in ICL MB
	ICL Inter Circle Ported Roamer	Inter Circle PO Roamer to STD Circle	Y	Roaming Call	Y	A No. Y	e.g. B-No. ICL DL -->PO to ICL WB and Roaming in ICL UPW
	ICL Inter Circle Ported Roamer	Inter Circle PI to ICL in Roaming	Y	Roaming Call	Y	A No. Y	e.g. B-No. ICL DL -->PI to ICL MB and Roaming in ICL UPW
	ICL Inter Circle Ported Roamer	Inter Circle PI to e.g. VF in Roaming	Y	Roaming Call	Y	A No. Y	e.g. B-No. ICL DL -->PI to VF MB and Roaming in VF UPW
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	ICL Inter Circle Ported Roamer	Inter Circle PI to e.g. VF in Roaming	Y	Roaming Call	Y	A & B No. Y	e.g. B-No. ICL DL -->PI to VF MB and Roaming in VF UPW
2	SMS						
	Normal	Normal	N		N	N	
	Normal	Inter Circle PO	Y	STD Call	Y	Y	
	Normal	Inter Circle PI to ICL	Y	Local Call	Y	Y	
	Normal	Inter Circle Cross Ported	Y	STD Call	Y	Y	
	Normal	Inter Circle PI to e.g. VF	Y	Local Call	Y	Y	
	Inter Circle PI to ICL	Normal Local	Y	Local Call	Y	Y	
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	Inter Circle PI to ICL	Inter Circle PO	Y	STD Call	Y	Y	
	Inter Circle PI to ICL	Inter Circle PI to ICL	Y	Local Call	Y	Y	
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	Inter Circle PI to ICL	Inter Circle PI to e.g. VF	Y	Local Call	Y	Y	
	Normal Roamer	Normal	N		N	N	
	Normal Roamer	Inter Circle PO	Y	Roaming Call	Y	Y	
	Normal Roamer	Inter Circle PI to ICL	Y	Roaming Call	Y	Y	
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TESTING SCENARIOS

	Cg Subscriber	Cd Subscriber	Required	Local/STD	Postpaid	Prepaid	Remarks
		Inter Circle PO Roamer to Local Circle	Y	Roaming Call	Y	A No. Y	e.g. B-No. ICL DL -->PO to ICL WB and Roaming in ICL MB
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	ICL Inter Circle Ported Roamer	Inter Circle PO	Y	Roaming Call	Y	Y	e.g. ICL DL -->PI to ICL WB and Roaming in ICL MB
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No CUG, CF, MMS, USSD, etc related scenarios suggested for testing to DoT. However, these will be tested for internal verification.

Verify

CDR

Charging

Call/Message Matured or Not