



Association of Unified Telecom Service Providers of India

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15th September, 2005

Shri Pradip Baijal,
Chairperson,
Telecom Regulatory Authority of India,
A2/14, Safdarjung Enclave,
New Delhi

Subject: Mobile Number Portability

Dear Sir,

This is with reference to the TRAI Consultation Paper on Mobile Number Portability. The paper is a well researched one and a good first step but we feel a considerable amount of work still needs to be done to study the issues and implications.

Primarily, the effort should be to introduce Mobile Number Portability only after it is introduced in the fixed line segment – this is the practice globally, or the other option would be to introduce portability simultaneously for both mobile and fixed line sectors. Short term technology solutions should be avoided at all costs and a central server topology should be adopted in the first instance itself.

Further, TRAI is already working on the concept of an Interconnect Exchange and if Mobile Number Portability is implemented, it would be preferable that if Portability is introduced it should be above the physical layer of the Interconnect Exchange, using a central server.

Whatever method or approach that may be adopted, our country cannot afford to support a short term solution that will have to be re-evaluated and restructured in a few years. The cost and effort involved for such an endeavor would be immense and a final, long term view must be taken.

There are several other key issues that also need to be studied, deliberated upon and examined before going ahead with the introduction of Mobile Number Portability in our country. Among them are:

- Number Portability will entail additional investments by all operators to augment networks, create data bases, implement and sustain new routing and switching arrangements.
- Consumers porting from CDMA to GSM and vice-versa will have direct costs attributable to handsets, which would serve as a major disincentive to port between the two different technologies.
- Many technical, commercial and administrative issues involved may be vast. It would also be incumbent upon all operators to exchange databases and customer information, which may prove to be a gargantuan task as has been experienced by other countries.
- Number portability will require changes in the Fundamental Plan (Routing, transmission and numbering plans) and possibly even the Licensing regime
- The cost structure of the Indian telecom sector is amongst the highest in the world, while it offers one of the lowest mobile tariffs. Mobile Number Portability is likely to increase the costs of both porting subscribers and those not porting because there will be an overall infrastructure cost involved.
- Today when the resources and efforts of the telecom industry are directed towards increasing Telecom penetration and reaching into remote and rural regions of the country, the need of the hour should be to make telecom services more affordable rather than increasing the costs.

In this context, therefore, though the Authority has pinpointed all the key issues related to introduction of mobile number portability we feel the better approach would be to introduce portability in both the fixed line and mobile sectors simultaneously.

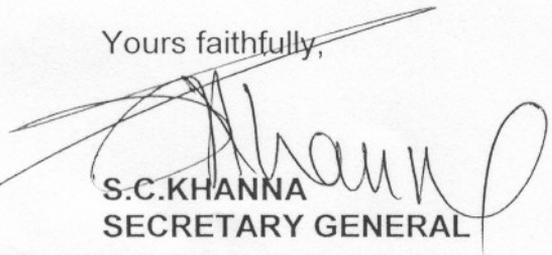
The reason why portability is needed in fixed service is that there is hardly any competition in the fixed line segment since the incumbents account for nearly 89% of the market share. Most countries, mentioned in the consultation paper itself, introduced Fixed Number Portability first before

moving to Mobile Number Portability. (HK SAR, UK, Australia, USA, Germany, France).

Keeping the above inputs in mind we would like to submit to the Authority that the issues relating to Number of Portability (both fixed and wireless) should be studied in detail and a comprehensive, long term solution should be devised for the country. In this context we should be extremely careful and address all the relevant issues involved to ensure that Portability does not meet the same fate as the introduction of Carrier Access Code in long distance services.

Thanking you,

Yours faithfully,



S.C.KHANNA
SECRETARY GENERAL

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Shri Rajendra Singh, Secretary, TRAI

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