

CONSUMER CARE SOCIETY

(Formerly Banashankari Consumer Protection Society)

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(Regd.under Karnataka Societies Regn. Act. 1960, Regn. No: 388/94-95)

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The Secretary
Telecom Regulatory Authority of India
New Delhi

Dear Sir,

Subject: Mobile Number Portability (MNP)
Reference: TRAI, Consultation Paper No.7/2005

Following are our comments on the above and are shown underlined.

References below are to the TRAI CP

Chapter 6. Issues for Consultation

1. What is the anticipated impact of number portability on customer satisfaction and increased competition between services and operators?

Our comments: In market conditions where a measure of growth stability has been reached and the QoS is satisfactory and consumers are happy with redress mechanisms, MNP can and will be the differential parameter working to the advantage of the service provider with the best track record. In India we are yet to reach this stage. With the prospects of mobile telephones becoming shortly available under Rs 1000/ we can expect a further massive expansion of the customer base both in urban, semi urban and rural segments, which in turn will result in urgent need for network enhancements. Hence for the present, the MNP factor may not have any significant at all; it will be the QoS and complaint redress issues which are much more urgent.

Having said that, it is quite appropriate to deliberate on the MNP aspects as well because sooner or later the Indian customer should also demand and be able to get such facility.

2. The following technical options have been discussed in the consultation paper. Please indicate your preference with reasons:

- a. All-Call-Query
- b. Query-On-Release
- c. Onward Routing (Call Forwarding)
- d. Call-Drop-Back
- e. Any other solution

Our views: Under "Any other solution"; a modified All-Call-Query, IE modified a. above of the TRAI, may also please be deliberated. We explain it here: The originating network first checks the location of the dialed number in the central database and then after checking the status of the dialed number, routes the call directly to the recipient network. This method will be better as the call will be directed only after making sure of the status of the dialed number. Hence, a better call completion.

3. In the past, some countries have followed the approach of implementation of a short-term solution, with parallel planning for a long-term solution. Several other countries have opted directly for a long-term solution. The issues associated with either approach are discussed in this paper. Please give your opinion, with reasons, on the path India should adopt.

Our views: For the reasons stated in 1 above, there does not seem to be a great hurry/need to start with a temporary solution and then migrate to a permanent solution with attendant cost penalty. As

we have fortunately started thinking on MNP quite early, let us go for a lasting solution and avoid the cost of temporary solution.

4. In case of a centralized database approach, who should be responsible for the setup, ownership, administration, and management of such a database? Should the administration and operation of a centralized database be assigned to a third party duly licensed by the licensor as an other service provider (OSP) on the lines of a clearing-house, or should some other approach be adopted?

Our views: TRAI's role must be that of a facilitator (that is of a benign regulator) encouraging the service providers themselves to decide on their preferred method. This comment also applies to points 5 to 10 below. TRAI should take the lead and take an active part in setting up technical committee/s of experts consisting of all the service providers or by their representative organization to come to decisions depending on the technical and financial and implementation aspects of MNP. TRAI can also seriously think of hosting in India a sessions of a Technical Committee by inviting representatives from countries and /vendors who have experience in implementation of MNP and also from ITU apart from Indian service providers. This can lead to a number of sub-committees on specialized study questions for deliberations and answers. This may result in economy and better solutions

5. How should the database updates between different operators be synchronized? Where could the central database be located?

6. What should be the level of centralization (metro, circle, national) for a centralized database? Should this be a permanent arrangement, or be subject to later revision?

7. How should NLDOs and ILDOs handle the routing of calls to support number portability?

8. Are the existing interconnection arrangements (such as signaling) between mobile-to-mobile, mobile-to-fixed networks sufficient to achieve number portability, or are any changes required?

9. Are there any technical issues in the portability of services such as SMS, data, voicemail, or fax?

10. What problems do you foresee with the current National Numbering Plan in implementing number portability that may necessitate the modification of the existing National Numbering Plan?

11. Should number portability related charges be regulated? If not, then what measures will ensure that the portability charges are not set such as to discourage portability?

Comments: Charges need to be regulated but at this time we do not have any idea of how.

12. What measures will ensure tariff transparency?

Comments: question not clear. If it relates to keeping the subscriber informed of the tariffs when he avails of MNP, a toll free national number or web site broadcast or customer centers may be options

13. Considering that the Indian market is a growing market and number portability offers the possibility of attracting customers by an efficient operator, should it be mandated that the cost of the number portability should be absorbed by recipient network?

Comments: Recommend to be absorbed by the recipient network considering it as a customer acquisition cost.

14. Please share any additional information that you might have about number portability implementations in countries and jurisdictions around the world, and what we might learn from these experiences.

Answer: None.

15. Give your comments, with reasons, as to when number portability should be introduced in India?

Comments: In our view, MNP is not yet a priority and can wait till technical aspects are reasonably sorted out. See comments against item 4 above.

16. Should MNP be implemented progressively by service area or directly across the nation at one time? No comments.

17. What will be the effect, if any, on the different aspects of implementation if phased rollout is adopted? No comments.

We hope you will find our comments as a useful input in your deliberations.

Regards

G S Gundu Rao

For Consumer Care Society, Bangalore-----

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P S: Please note the change in the address and email id of our Consumer Care Society