



12th April 2013

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Sub: Idea Cellular's response to the Draft Telecommunication Mobile Number Portability (MNP) (Fifth Amendment) Regulations, 2012

This is with reference to the Authority's invitation for comments on the above-mentioned draft Amendment to the MNP Regulations, 2012. Our understanding of the proposed draft amendment is to eliminate the possibility of wrong rejections on corporate accounts. In this regard Idea would like to submit the following comments as a better and uncomplicated option:

1. In the format of Authorization letter for porting of Mobile Numbers, NOC (endorsement) or rejection with reasons from DO be added in the format of the Authorization letter itself with company stamp, name and signature of the DO's official. Accordingly the given format needs to be changed. The RO will keep the records of the above letter for a certain period.

The Authority should also make mandatory provision that DO must take action in the stipulated time and failure or intentional delay to take action either in terms of the NOC or recording reasons for rejection shall be treated as deemed acceptance on part of the DO. No opportunity of rejection should be available once the porting request has been made on the MNP system.

2. As the above Authorization Letter would contain the NOC from the DO, it would eliminate possibility of wrong rejections after the port-in request has been generated in the MNP system, which is the key objective of this amendment. Also there is enough time for the corporate customer to reach the DO and get the NOC within the 15 days of UPC generation.
3. Further, the proposed revised letter of Authorization may be sent to the designated email Id's of the MNPO by a separate email as pushing it in scanned copies over the MNP systems would require huge system developments, avoidable costs and time.
4. In view of the above, we feel that *identification and allotment of distinct identification code to all corporate numbers and prefixing of character C to the UPC generated for porting* may not be required which would save huge costs of IT developments and the lead time of 2-3 months. Also the Identification of corporate subscribers in the data base and in the UPC would also unnecessarily expose the corporate customers to various points where subscriber data is available or submitted and this information may get circulated in the open market.



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Thus we wish to emphasize that the intended objective of eliminating wrong rejections on corporate accounts can also be achieved through the implementation of 1, 2 and 3 above which is a less complicated option to achieve the objective and not necessarily through 4 which is more complicated and involves huge costs and lead time.

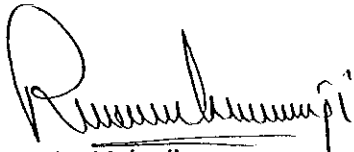
You will also appreciate India the second largest and the fastest growing telecom market in the World has a network architecture that is unique across the World, because of the various layers involved and the linkages between various systems like the MNP, LIM, UCC, IN, etc. Hence, every change that is sought to be introduced has ramifications and costs implications for all the linked systems.

We hope the proposal suggested by Idea will make the process simple and save costs/time to a great extent and we earnestly believe that the Authority will give due consideration to our aforementioned comments before formalizing any guidelines on the issue.

Thanking You,

Yours faithfully,

For IDEA Cellular Limited


Rajat Mukarji
Chief Corporate Affairs Officer