

To,

Dated: April 02, 2013
No.SVR/FY12-13/MNP/AMT/001


Rajeev Agrawal
(Secretary)
Telecom Regularity Authority of India,
Mahanagar Door Sanchar Bhawan,
J.L.Nehru Marg, (Old Minto Road),
New Delhi -110002

Subject: Response on "Telecommunication Mobile Number Portability (Fifth Amendment) Regulations, 2013"

Dear Sir,

This is with reference to TRAI's Telecommunication Mobile Number Portability (Fifth Amendment) Regulations, 2013. In this regard, kindly find enclosed our response for your kind consideration.

Yours Sincerely,


Sanjay Kasturia, Director
Syniverse Technologies (India) Pvt. Limited.



Encl: copy of Telecommunication Mobile Number Portability (Fifth Amendment) Regulations, 2013

Syniverse Response to TRAI Telecommunication Mobile Number Portability (Fifth Amendment) Regulations, 2013

Syniverse Technologies welcome the authority's initiative for seeking comments on Mobile Number Portability Procedure for Corporate Mobile Phone Number. Detailed Response to Mobile Number Portability Procedure for Corporate Mobile Phone Number as follow:

13A – Allotment of distinct identification code to corporate mobile number- (1)

Syniverse Response: No comments

13B – Procedure for porting of corporate mobile number-

- (a) – No Comments
- (b) – No Comments
- (c) a subscriber of corporate mobile number may make porting request simultaneously for more than one mobile number:
Provided that separate unique porting code shall be generated for each mobile phone number and the subscriber shall be liable to pay porting charge for each such mobile phone number;

Syniverse Response:

Since bulk porting request is a single transaction comprising of more than one MSISDN it is advisable to have a master unique porting code per request, this will act as a primary key for the whole request instead of separate unique porting code for each MSISDN.

Max 50 MSISDN should be allowed as part of one single bulk port request with a single Corporate specific Unique porting code, if the unique porting code entered is correct then the whole list of MSISDN's are subject to the next steps of porting process. If a wrong corporate specific Unique porting code is entered the whole transaction shall be rejected. This would avoid any partial processing of a bulk request and make the whole experience more simplified and effective.

No partial processing of a bulk request should be allowed as this has potential to create chaos. Since the bulk request is treated as a single transaction any failure during processing of a MSISDN the whole transaction should be rolled back and Recipient can resubmit the bulk port request.

- (d) – No Comments



- (e) every recipient operator shall, on receipt of porting request:-
(ii) forward, within twenty four hours of the receipt of porting request, the corporate mobile phone number and its unique porting code and scanned copy of the authorization letter from the authorized signatory, to the Mobile Number Portability service provider; and

Syniverse Response:

Clearing house shall forward the authorization letter part of the bulk request to the respective Donor; however authorization letter shall not be stored at the clearing house.

Authorization letter embedded via SOAP attachments will require additional development at clearing house and service providers end, thorough performance analysis/tests need to be carried out which may require some enhancement (additional hardware, software modification).

Alternative methods of transmission, e.g. email or fax, would increase operational costs, and these costs will need to be assessed.

- (f) every Donor Operator shall reject a request for porting of corporate mobile number if the same is not accompanied by an authorization letter from the authorized signatory of the subscriber

Syniverse Response:

If Donor Operator rejects a request for the porting of corporate mobile number then whole transaction request comprising of all corporate MSISDNs shall be rejected. At any given point of time the corporate entity should consist of single corporate operator, this shall simplify operations for corporate, operator and clearing house.

Each Bulk request should have same Donor for MSISDN's listed as part of the request, a bulk request pertaining to multiple Donor shall be rejected at clearing house.

