



9<sup>th</sup> April 2013

Mr. Sanjeev Banzal,  
Advisor (Networks, Spectrum and Licensing)  
**Telecom Regulatory Authority of India,**  
Mahanagar Door Sanchar Bhawan,  
Jawahar Lal Nehru Marg,  
Old Minto Road,  
New Delhi – 110002

**Subject: Telecommunication Mobile Number Portability (Fifth Amendment) Regulations, 2013**

Dear Sir,

This is with reference to the above mentioned draft amendment on "**Telecommunication Mobile Number Portability (Fifth Amendment), 2013**". We thank the Authority for giving us the opportunity to express our opinions on the draft amendment.

Please find our comments in detail below:

*13B – Procedure for Porting corporate mobile number- Subject to provisions of regulation 6, regulation 7, regulation 8, regulation 9 , regulation 10, regulation 11, regulation 12 and regulation 13 the following conditions shall be applicable for porting of corporate mobile number :*

*a. no corporate mobile number shall be ported unless the porting request in respect of such number is accompanied by an authorization issued by the authorized signatory of the subscriber to whom such number has been allotted;*

**TTL:** We are in agreement with the proposed TRAI process. We request the Authority to amend the current rejection reasons by way of including rejections of corporate number porting which are not accompanied by the authorization letter. Copy of Company ID of authorized signatory should be made a mandatory document along with Authorization letter.

*c. a subscriber of corporate mobile number may make porting request simultaneously for more than one mobile phone number:  
Provided that separate unique porting code shall be generated for each mobile number and the subscriber shall be liable to pay porting charge for each such mobile phone number:-*

**TTL:** - We would like to suggest that in multiple Port-in request scenario, if a particular mobile number Port-in request is rejected for any reason (For example, UPC mismatch/incorrect/expired, Port-in within 90 days, etc.) then also Port-in request for other accepted Mobile numbers should be processed.

*d. every Access provider shall prefix the character 'C' to the unique porting code generated for porting of corporate mobile number:*

**TTL:** - TTL would like to understand whether prefixing 'C' that is proposed for the corporate porting will be in addition to the current UPC length of 8 alpha-numeric characters thereby making

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the corporate UPC code as 9 alpha numeric characters long or is it to be the first alpha- numeric character of the existing UPC format of 8 characters whereby the first 3 would be alphabets i.e CXX (XX-for operator & service area) and then rest 5 would be the digits. We request the Authority to clarify the same.

- e. every recipient operator shall, on recipient of porting request:-
- i. ensure that the customer acquisition form is accompanied by authorization letter from the authorized signatory of the subscriber of the corporate mobile number:

**TTL:-** We are in agreement with the proposed TRAI process. However, we suggest that the Authorized Signatory should be as defined by the latest DoT guidelines for subscriber verification.

Further, based on the proposed corporate porting process, we would also request Authority to amend /modify the following timelines:

- i. SLA for Recipient Operator for forwarding the porting request to MCH needs to be increased from 1 day to 3 working day since there is an additional process of scanning of the Authority Letter.
- ii. SLA for Accepting /Rejecting Port out at donor end needs to be changed from 1 day to 3 day as there will be manual activity for validating the Authorized Signatory.
- iii. In case Port Out request does not contain Authority Letter, the rejection reason needs to be created which will depict rejection due to non availability of Authorized letter.

We sincerely hope that our views will be given due cognizance before finalizing the proposed amendment.

Thanking you,

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Anand Dalal', written over a circular stamp.

Anand Dalal  
Senior Vice President- Corporate Regulatory Affairs  
Tata Teleservices Limited  
And  
Authorized Signatory  
Tata Teleservices (Maharashtra) Limited