

To,

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Sub. :Comments on TRAI Draft Telecommunication Mobile Number Portability (Sixth Amendment) Regulations, 2015

The TRAI issued Draft Telecommunication Mobile Number Portability (Sixth Amendment) Regulations, 2015 on 23.01.2015 on the aforesaid subject and asked the various stakeholders to comment on the issues involved in the Regulation. In this regard the following is submitted for consideration:

1. As vide point(6) of the draft regulation, one of the reason of rejection “clause 12(f) of the Main Regulation” is suggested for deletion, therefore it is requested to provide a cut-off date after inter service MNP is launched, to clear in process port orders, which may fall under the referred rejection code.
2. In reference to point (7) of draft regulation it is submitted that “amount of outstanding bill” may be replaced by “payment of outstanding bill”. Further since 15 days have been granted to donor operator in order to reverse the disconnection order for recipient operator so atleast 1 week should be provided to recipient operator after expiry of 15 days for disconnection of number so as to accommodate last day reversals of disconnection.
3. At present the responsibility of payment of outstanding amount of ported in numbers till the eventual date of porting is shouldered on recipient operator. It is suggested that the donor operator should be made solely responsible for clearance of outstanding bill till the eventual date of porting and close the account of porting number. In case, the outstanding of the porting number is not cleared by the customer to the donor operator, the donor operator directly request to recipient operator to terminate the said porting number through MCH and recipient operator disconnects that ported in number within the prescribed period and return the same number to the number range holder.
4. Once NPOs disconnection has taken place, LRN of the number range holder should immediately be updated rather than waiting for return of number to number range holder.
5. The present NPOS system for MNP needs to be reviewed. A monitoring procedure for NPOS/action taken by concerned operators/timelines/reminders should be in place, lacking which operators shall keep on accumulating such outstanding on account of MNP.

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