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To

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Subject: Comments on TRAI Consultation Paper on Mobile Number Portability.

Sir,

Kindly refer to TRAI's Consultation Paper dated 22.7.2005 on Mobile Number Portability. The comments of MTNL are as follows:-

1. It is pre-mature to implement the concept of Mobile Number Portability in the Indian network. India's teledensity (fixed/mobile combine is 9.86% only at the end of July, 2005 with 59.83 million and 47.17 million fixed lines). Hence, the mobile tele-density is still very low. There are other important issues like interconnection, ADC, rural tele-density, 3Gs Spectrum, Broadband Services on mobile network, M-commerce etc. which needs to be given priority. Presently, emphasis should be on increasing the mobile penetration, QoS and availability of cheaper hand-sets.
2. The comparison with United States and other European countries are not relevant because of the totally different scenario in India. These countries have inducted MNP after their markets are saturated, QoS is very high and hence customer can think of other facilities like Number Portability etc.

MTNL still has a large number of E-10B switches which do not support CCS7 signalling. Moreover, the present IN platform from CDOT does not work with SSPs of the new technology switches deployed in MTNL network.

3. The system requires upgradation for implementation of Mobile Number Portability. Hence it is not possible to implement the same at this stage.

4. MTNL was amongst the last entrants in mobile telephony and has been facing some billing complications and the system is still in the process of settling the problems. The whole process cannot be jeopardized by adding the complication of number portability and leading to customer dissatisfaction.
5. Introduction of MNP will require additional expenditure on the part of the operator which ultimately result in increasing the tariff for the consumers. Indian market for mobile services is passing through intense competition with 4-7 players in each service area and consequently the subscriber are enjoying the lowest tariffs in the world. Indian consumer is very price conscious and any increase in tariff which is inevitable in view of the additional capax involved for providing Number Portability is not likely to be accepted by the consumer. Having enjoyed the lowest tariff for mobile services in the world, any additional charges are only expected to increase customer dis-satisfaction.
6. The TRAI's consultation paper itself considers that it is pre-mature to induct INP, FMP Location Portability and Service Portability etc.

In view of the above views, MTNL request that MNP may not be considered for introduction at present and other important issues as enumerated in para (1) above may be paid higher attention. Accordingly, issue-wise responses to the consultation paper is not being given by MTNL at present as Mobile Number Portability is not considered appropriate by MTNL at present.

(P.K. BHAN)
DE (RA&C)