



RSM/COAI/2018/092
May 18, 2018

Shri Syed Tausif Abbas
Advisor (NSL-II),

Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi – 110002

Subject: Additional Comments on TRAI Consultation Paper on 'Review of Mobile Number Portability (MNP) Process'

Dear Sir,

This is with reference to the TRAI consultation paper on Review of Mobile Number Portability (MNP) Process, released on April 06, 2018 and our submission dated May 07, 2018 to the said consultation paper.

In this regard, please find enclosed our additional comments on Q.15 of the consultation paper.

We would like to inform the Authority that one of our member, RJIO, has a divergent view on our submission.

We hope that our submission will merit your kind consideration and support.

With Regards,

Yours faithfully,

Rajan S. Mathews
Director General



Additional Comments on TRAI Consultation Paper on 'Review of Mobile Number Portability (MNP) Process' dated April 06, 2018

Q15. Should the provision of withdrawal of porting request be done away with in the revised MNP process? Please state your answer with justification.

1. In continuation to our submission made on TRAI consultation paper on 'Review of Mobile Number Portability (MNP) Process' vide our letter dated May 07, 2018 on the above question, please find below our additional comments:
2. Vide our earlier submission; we had suggested that the choice to withdraw the porting request should always be there for the subscribers. Also, we had suggested a SMS based porting withdrawal system to be implemented in order to ease the withdrawal process.
3. Further, the provision of withdrawal facility of porting request should be viewed essentially from the perspective of customer's right to exercise his choice. Doing away with this facility would not only deny the customer the opportunity to re-consider his decision, but will also deny the Donor Operator their legitimate right to retain their customers. Thus, the option of withdrawal of porting request should be part of regulation.
4. At times, the customer may apply for MNP under the influence of PoS, but may subsequently decide to withdraw his request after analyzing the new offer in detail or on resolution of his grievance related to network, billing of tariff plan, etc. The proposed changes would mean that neither the customers would have any opportunity to reconsider his/her decision nor the Donor Operator would be allowed to retain their customers by addressing their grievances.
5. It is pertinent to mention that the present regulation has worked very well during the last 8 years and does not require any change. A period of 24 hours, as prescribed in the present regulation for the withdrawal of porting request, was formulated after a series of deliberations in order to provide more flexibility to the customers.

In view of the above, we request the Authority to continue with the option of allowing the customer to withdraw the MNP request within 24 hours.

Also, we would again like to request TRAI to consider our suggestion to implement the SMS based withdrawal process.

Further, as stated in our response dated May 07, 2018 to the consultation paper, one of our member operator, RJIO, has a divergent views on our submission.