



**MNP INTERCONNECTION TELECOM SOLUTIONS INDIA PVT. LTD. (MITS)**

Response to

Draft Telecommunication Mobile Number Portability (Ninth Amendment)  
Regulations, 2023

## **Issues for Consultation**

Q1. Whether it would be appropriate to introduce an additional criterion for rejection of the request for allocation of Unique Porting Code (UPC) in respect of any mobile connection, which has undergone the process of SIM swap/ replacement/ upgradation? Kindly provide a detailed response with justification.

Q2. If your response to the Q1 is in the affirmative, kindly provide detailed inputs on the draft amendment regulations given above.

Q3. Stakeholders are requested to provide detailed inputs with justification on the DoT's proposal that – (a) after the generation of UPC code, at an appropriate stage, the demographic details of the subscriber such as Name, Gender, Date of Birth and Photograph, etc., or scanned copy of Customer Application Form (CAF)/ Digital CAF may be transferred from Donor Operator to Recipient Operator. To avoid time delays, such transfers may preferably be done through electronic means; and (b) the Recipient Operator should match the demographic details of the subscriber with those details received from Donor Operator. If the subscriber's demographic details match, then only further steps in MNP process may be allowed otherwise, the porting process may be terminated.

Q4. Are there any suggestions /comments on any other issues for improving the process of porting of mobile numbers? Please provide a detailed explanation and justification for any such concerns or suggestions

## **BACKGROUND**

MNP Interconnection Telecom Solutions India Pvt. Ltd., hereinafter referred to as “MITS”, was granted a license to provide MNP services in Zone 2 (South and East of India) in March, 2009. MITS has provided flawless service in Zone 2 (South and East region) to the industry in the last 12 years of service. Further, MITS has supported both the Regulator, Telecom Regulatory Authority of India (“TRAI”), and the Licensor, the Department of Telecommunications (“DOT”), at various stages including implementation of Corporate Bulk porting or National porting and most recently the implementation of new MNP process defined in the seventh amendment regulation. We have always followed and advocated use of international best practices based on immense experience and expertise of MITS’s parent, Telcordia Technologies Inc. doing business as iconectiv.

MITS would like to thank TRAI for this opportunity to provide our comments on this important consultation. Please find the response from MITS to each of the points raised in the consultation for your ready reference.

## **RESPONSE FROM MITS**

**Q1. Whether it would be appropriate to introduce an additional criterion for rejection of the request for allocation of Unique Porting Code (UPC) in respect of any mobile connection, which has undergone the process of SIM swap/ replacement/ upgradation? Kindly provide a detailed response with justification.**

### **MITS Response:**

Yes, MITS agrees with the suggestion to introduce an additional criterion for rejection of the request for allocation of UPC for a mobile connection that has undergone the process of SIM swap/ replacement/ upgradation. This criterion will impose a temporary restriction to porting due to non-allocation of UPC thereby reducing fraudulent activity and also help to address illegal porting of premium / fancy MSISDNs.

While this new validation may help in limiting issues of frauds due to SIM swaps, a genuine subscriber undergoing a SIM replacement/ upgradation who wishes to apply for porting immediately / shortly after a SIM change will also be unnecessarily impacted. It is therefore suggested that proposed port restriction time of 10 days following a SIM change (for any reason) should be re considered and should be decided based on **quantum of cases** that result in fraudulent activity following a SIM change. We recommend a porting restriction period of up to 2 - 3 days.

**Q2. If your response to the Q1 is in the affirmative, kindly provide detailed inputs on the draft amendment regulations given above**

### **MITS Response:**

The amended regulation rightly captures the inclusion of additional validation to be included in the UPC query to the Donor Operator. MITS would like to suggest an additional point to be included in the regulation: Response from donor on this additional validation will be either Y/N. If Yes, then Donor Operator should share the date of SIM change as well with the MCH. This will help MCH to calculate and communicate in SMS the actual date after which the subscriber should request for the UPC. This additional information is likely to prevent a lot of un wanted UPC traffic for MCH and the Operators.

**Q3. Stakeholders are requested to provide detailed inputs with justification on the DoT's proposal that – (a) after the generation of UPC code, at an appropriate stage, the demographic details of the subscriber such as Name, Gender, Date of Birth and Photograph, etc., or scanned**

**copy of Customer Application Form (CAF)/ Digital CAF may be transferred from Donor Operator to Recipient Operator. To avoid time delays, such transfers may preferably be done through electronic means; and (b) the Recipient Operator should match the demographic details of the subscriber with those details received from Donor Operator. If the subscriber's demographic details match, then only further steps in MNP process may be allowed otherwise, the porting process may be terminated.**

**MITS Response:**

The validation of demographic detail as part of the porting process is crucial to avoid fraudulent cases. Proposed modifications in the porting process should further make it simple and seamless with no or minimal impact to subscriber's porting experience. MITS understands that proposed process for subscriber validation is applicable only for individual port requests. MITS further suggests that exchange and validation of subscriber's demographic detail should be performed at the time of port request. We have the following suggestions in this regard:

1. The demographic details of subscriber will be a part of the port request initiated by the Recipient Operator. List of proposed demographic details like **Name, DOB, gender** must be shared as mandatory fields. MITS would also like to additionally suggest including **subscriber's SIM number** as another mandatory field in the port request, to be validated by the Donor Operator. Validation of SIM number will act as an imperative check for fraudulent cases by ascertaining the subscriber identity.
2. MITS is of the opinion that validation of demographic details of subscriber (individual ports) should be done by **Donor Operator based on similar validation/ guidelines issued by TRAI / DoT on CAF**. The acceptance / rejection of port request will be dependent on Donor response. MITS proposes time period of 4 calendar hours should be mandated to complete the validation by the Donor.

This way we will be able to address the fraudulent porting, minimize security threats and add value to the overall porting process / experience.

**Q4. Are there any suggestions /comments on any other issues for improving the process of porting of mobile numbers? Please provide a detailed explanation and justification for any such concerns or suggestions**

**MITS Response:**

Yes, MITS would like to highlight below key issues where further improvement / action is imperative to improve the (a) porting experience of the subscriber and (b) optimize MCH and operator system MNP traffic.

1. **UPC rejections.** MITS has observed major portion of the UPC request gets rejected specifically under “wrong keyword” and “invalid request” category. On an average MITS is rejecting 2mn requests per month under these categories and not generate the UPC for such requests because of a wrong keyword or because the request submitted is itself not valid. This can be improved by educating the subscribers through ads, process awareness programs & campaigns thereby reducing the overall UPC rejections. This would enhance Porting experience and will also lead to reduced system load.
2. **Port requests raised without generation of UPC.** This validation was introduced after implementation of seventh amendment regulations in MCH system and it is observed that a considerable portion of port requests (120K requests per month) are received for MSISDNs where a UPC is not generated. There is a possibility that such cases could have happened due to manual error where the MSISDN was incorrectly entered in the port request but if the intention is to deliberately port a number whose UPC is not generated, it will fall under the category of fraudulent porting.
3. **MNP Holidays.** Currently there are 19 holidays configured throughout the industry in a calendar year making it a no port window. MITS has always observed a surge in porting during the holidays, either due to subscriber convenience / increase in operator campaigns. From a technical standpoint, we would like to inform that MCH system and processes are fully automated and do not require a manual intervention or personnel presence at all times. MITS is therefore of the opinion that number of MCH holidays can be limited to only 3 national holidays - Independence Day (15th August), Republic Day (26th January) and Gandhi Jayanti (2nd October). This will prevent delays in subscriber porting of additional days which are declared as holidays.
4. **Age on network.** MITS suggests reducing the age on network from current 90 days to 60 days. This is to facilitate subscribers who wish to port out again due to any reason and are currently under mandatory porting freeze period of 90 days.
5. **New provisions.** Introduction of porting in 2011 has empowered the subscribers to choose their service providers and switch amongst them based on their needs and requirement. This has also benefitted the operators in terms of revenue growth by gaining subscribers through this process. With the rise in usage of M2M SIMs, similar benefit can be replicated for users by implementing bulk porting for M2M SIMs. It is the need of an hour to consider bulk port provisioning for M2M SIMs to be taken as part of MNP enhancements. MITS would be happy to discuss this further with the authority and industry on best ways of its implementation.