airtel

Letter No. TRAI/FY23-24/50
Dated: 08.11.2023

To,
Shri Akhilesh Kumar Trivedi,
Advisor (Network Spectrum and Licensing)
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
JawaharLal Nehru Marg,
New Delhi – 110 002.

Subject: Response to "Draft Telecommunication Mobile Number Portability (Ninth Amendment) Regulations, 2023"

Dear Sir,

This is in reference to TRAI's Draft Telecommunication Mobile Number Portability (Ninth Amendment) Regulations, 2023" dated 27.09.2023.

In this regard, please find enclosed our response for your kind consideration.

Thanking You,

Yours' Sincerely,
For **Bharti Airtel Limited**

Rahul Vatts
Chief Regulatory Officer

Encl: a.a

Response to TRAI's *Draft Telecommunication Mobile Number Portability (Ninth Amendment) Regulations, 2023*

<u>**Executive Summary:**</u>

Airtel thanks the Authority for issuing this important consultation paper that aims to address the issues around unwarranted porting.

It is imperative to note that cases of unwarranted porting are extremely rare however it is prudent to improve the process to mitigate even such rare cases, therefore it is of critical importance that the processes under the Mobile Number Portability (MNP) regulation be reviewed and steps to mitigate and eliminate such risks be introduced.

The Authority would recall that the TSPs have been in constant discussions for over two years now with the licensor as well as the regulator about addressing this issue and have always been in support of introducing steps to eliminate fraudulent porting.

In summary, Airtel submits the following:

- *Airtel agrees with the suggestion of not allowing MNP for 10 days from the date of successful SIM swap/Sim upgradation excluding the transition from physical to e-SIM.*

- *TRAI should include a separate reason for rejection (in cases of a SIM swap) in the MNP Regulation in order to transparently communicate to the customer the reason for not generating the UPC code.*

- *To implement system changes (like API integration at the backend, load and response time testing, MNPSP testing, etc.) both at TSP as well as MNPSP level, a period of 90 days should be granted.*

- *At the time of porting, the name of the customer should be matched with that in the database of the Donor Operator (DO). The matching based on a defined logic which should be the responsibility of a third party which could be the MNPSP.*

- *The logic of matching the name should be designed by the MNPSP in consultation with all the TSPs and standard logic should apply for such matching.*

- *In cases of corporate connections, there are certain requirements (like UPC, email ID of the authorised signatory) as part of the Authorisation letter format that have, in the past, led to unwarranted rejections. Airtel recommends that such requirements be done away with since they do not help in any way to verify whether or not the authorisation letter in question is indeed authentic.*

With the above view, please find below Airtel's question-wise response:

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

Airtel Response:

Airtel agrees that MNP should not be allowed until 10 days after the date of SIM swap/Sim upgradation, excluding instances of physical to e-SIM and corporate portings. At the same time, in the interests of customers, **a separate reason for rejection (in case of the SIM swap) should be incorporated into the MNP Regulation to transparently communicate to the customer the reason for not generating the UPC code as currently done when providing reasons for the rejection of the UPC request.**

In terms of system readiness, this option will require changes both at TSP as well as MNPSP level from a regulation standpoint. Airtel expects that a **period of around 90 days will be needed** to make the necessary changes in the TSP systems alone since this would entail API integration at the backend, followed by load and response time testing and TSP-MNPSP system testing for an effective and error-free roll out.

> **Q3. Stakeholders are requested to provide detailed inputs with justification on the DoT's proposal that –**
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> **(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.**

Airtel Response:

While Airtel is of the view that in the interests of subscribers and to ensure that the same subscriber ports to the Recipient operator a check and balance mechanism be put in place, the proposed process of sharing the CAF and matching the details of the CAF will not be a practical solution for achieving this objective. **It will make the customer journey unnecessarily cumbersome, thereby defeating the very intent of porting.**

Instead, only the name of the customer should be matched with that in the database of the Donor Operator (DO) at the time of porting. **The matching based on a defined logic should be the responsibility of a third party which could be the MNPSP**.

The logic designed to match the name should be the responsibility of the MNPSP in consultation with all the TSPs. It should also become the standard consideration for each matching. This will eliminate any conflict of interest and will be the most transparent process for achieving the objective. In order to make the process transparent, MNPSP should share the name matched along with The process would then proceed as follows:

1. Customer requests for UPC as per existing process.
2. Customer approaches the RO to initiate the porting of his/her MSISDN. At this stage, RO will share the customer name with MNPSP.
3. MNPSP conducts required checks in its own system and then approaches the DO to get the name of the subscriber being ported from the DO database.
4. DO shares the name of the customer with MNPSP through API integration.
5. **At this stage, the MNPSP matches the name of the subscriber received from the DO with the name received from the RO.**
6. If the name matches (based on a logic which must be agreed with by all stakeholders), the MNP request is processed as per extant process.
7. If the name does not match, the MNPSP rejects the request and informs the RO as well as the customer the cause for rejection. Masked name shall be displayed to RO for transparency purposes.
8. The reason for rejection is clearly communicated to the RO and the customer as *"Customer name does not match the name of the customer with Donor Operator."*

Once again, it is important to iterate that the process of matching the customer name (instead of providing various CAF details) in an operator-neutral manner should be adopted.

> **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.**

Airtel Response:

While on the one hand the entire MNP process is automated, the process for validating authorisation letters (in cases of corporate connections) remains manual. Under the authorisation letter contains UPC, email ID of the authorised signatory which bear no significance in the validation process therefore should be dispensed with as retaining such unwanted details in the Authorisation letter often results in rejections.

Therefore, Airtel requests that the mandatory fields for such details be excluded from the authorisation letter to make the porting process efficient.

Furhter, the name of TSP mentioned by the Authorised signatory bears no relevance such as VIL, Vodafone, Vi, Idea, etc, still the operators reject porting request on such inconsequential verbiages, therefore Authority should categorically clarify that this information shall not be used to reject the port request.

Similarly, in the case of names of Licensed Service Areas (LSAs), different names of the same LSA should be treated as similar/the same, e.g., MPCG, MP & Maharashtra, and RoM should be considered the same and such submissions should not be rejected.

A revised format for the Authorisation letter is proposed *in Annexure A*

It is submitted that while the above suggested changes in the Authorisation letter should be implemented immediately towards customer convenience and to control unwanted rejections by removing the fields which don't add any value to the process, the process of matching the signatures and other details of the authorized signatory towards checking the consent of the Authorised signatory needs to be reviewed holistically as this is the only manual activity in the entire MNP process. Since this process of validation is very subjective and depends upon the scrutinizing officer, an alternate approach is proposed (as explained below at **Annexure B**) which may be eventually implemented to overcome such rejections to a large extent. The steps need to be process-driven rather than person-driven.

Annexure A

<On Company's letter head>

Subject: **Port Out of Corporate Mobile Number**

I_____ **(Name of Authorised Signatory)** the authorised signatory of _____ **(Name of Corporate)**, hereby authorise the porting out of the following mobile phone numbers from <Donor Operator> <<current LSA> into <Recipient Operator> in <<new LSA>>.

It is certified that I am the authorised signatory for the above-mentioned mobile numbers and all necessary payments of full and final settlement for these mobile numbers will be made post the completion of the porting process.

Signature of Authorised Signatory   : _____
Mobile Number of the Authorised Signatory : _____
Stamp of the Company/Corporate   : _____
Date   : _____

Note:
1. If the letter has more than one page, each page must be signed by the Authorised Signatory.
2. For LSA names, MP & MPCG, Bihar & Jharkhand, AP & Telengana, TN & Chennai, Maharashtra & Goa will be considered the same.
3. Telecom Service Provider name, Bharti Airtel Limited/Airtel/BAL and Vodafone Idea/Vodafone/Idea/VIL and JIO/RJIL/RJIO will be considered as the same name.

Annexure B

Step 1: Customer requests for UPC as per existing process

Step 2 : Customer approaches the RO to initiate the porting of his/her MSISDN

Step 3 : Recipient operator will punch the request into their system with company documents, UPC details and Authorized signatory name and alternate number.

Step 4 : MNPSP does the required checks in its own system and then approaches the DO to get the Authorized signatory name and alternate number of the subscriber being ported from the DO database.

Step 5 : Authorized signatory Mobile will be shared by Donor with MNPSP through API integration.

Step 6: At this stage, MNPSP will do validation of Authorized signatory name and Alternate Number received from the DO with that available to him as received from the RO.

Step 7: In case the validation is successful, the MNP request is processed as per extant process.

Step 8: In case of mismatch in the validation of the Authorised Signatory name and alternate number, MNPSP to reject the request and inform the RO as well as the customer with the reason for rejection.

Step 9: The reason for rejection to be clearly communicated to the RO and the customer as "Customer name or Alternate Number details mismatch with the details of the customer with Donor Operator".

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