



24<sup>th</sup> October 2018

**Telecom Regulatory Authority of India,**  
Mahanagar Door Sanchar Bhawan,  
Jawahar Lal Nehru Marg,  
Old Minto Road,  
New Delhi – 110002

**Kind Attn: Mr. S. T Abbas**  
**Advisor (Networks, Spectrum, Licensing)**

**Subject: Draft Telecommunication Mobile Number Portability (Seventh Amendment) Regulations, 2018.**

Dear Sir,

We appreciate Authority's continuous efforts for regularly reviewing regulations to safe guard the interest of consumers.

Also, we thank the Authority for giving us the opportunity to express our opinions on the draft amendment. Accordingly, in reference to the above-mentioned Draft Amendment Regulation, we would like to submit our point wise response attached with the letter as Annexure-I.

We hope our inputs will be given due consideration.

Thanking you and assuring you of our best attention always

~~Yours sincerely,~~

~~Satya Yadav~~  
~~Add. Vice President – Corporate Regulatory Affairs~~  
~~Tata Teleservices Limited~~  
~~And~~  
~~Authorized Signatory~~  
~~Tata Teleservices (Maharashtra) Limited~~

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## Telecommunication Mobile Number Portability (Seventh Amendment) Regulations, 2018

### Allocation and Delivery of Unique Porting Code:

TTL is of the view that major changes in respect of Allocation and Delivery of Unique Porting Code is to be done at MNSP end. The changes would call for hardware requirement that may arise due to failure response in the clearance process and would require a retry, in case of technical issues.

### Revised process for validation of conditions and generation / delivery of UPC:

As per the revised process the First level check on Port Out request has to be done by the MNPSP in their data base for 90 days criteria from previous porting OR if a porting request is in progress for the mobile number.

The MNSP would query the below information from Donor Operator's data base and would validate it before generating the UPC.

- Prepaid / Postpaid
- Corporate Mobile number
- Contractual obligations
- Sub-judice check
- 90 days criteria from activation
- Ownership change in progress
- Outstanding payments check
- Prohibited by LEA

There are changes required in the MNP flow at TTL end as currently, while the port out request is received from MNSP, a Service Request gets raised along with an SLA wherein Port-out acceptance response and Port disconnection are inter-dependent.

TTL is of the view that in order to implement these changes at it's end, we would require lead time for necessary hardware and process changes within our systems.

### Process to be performed by MNPSP before allocating UPC

In reference Regulation 4.3.f. "There are outstanding payments due from the subscriber by way of pending bill or bills, as the case may be, issued as per the normal billing cycle but before the date of application for porting (in case of postpaid number);

TTL is of the view that the date of application of Porting to be considered as when Customer requested to Receipt operator with UPC and not the date when UPC generated and Porting request to be rejected if there is an outstanding at that time.

### Contravention of the provisions of MNP Regulations:

It has been proposed in the Telecommunication Mobile Number Portability (Seventh Amendment) Regulations, 2018 that in order to protect the interest of Mobile Subscriber, the Donor operator would be liable to pay an amount by the way of financial incentive, not exceeding Rs 10,000 for each contravention OR as the authority may direct.

TTL is of the view that that the authority may device a process to bifurcate between a wilful contravention and a technical error due to system failure etc, thus ensuring that the Donor operator is not penalised for an error as a result of system failure.



**Time period for implementation of the amendment and reduction in time for porting:**

It has been proposed in the Telecommunication Mobile Number Portability (Seventh Amendment) Regulations, 2018 to reduce the porting time from 4 days to 2 days in Intra LSA MNP and to 4 days in Inter LSA MNP.

TTL is fine with the changes proposed in reduction of time for porting by the authority.

**24x7 de-activation and activation of mobile numbers:**

The authority has agreed to continue with the existing activation/ deactivation windows to cause minimum inconvenience to the subscribers and the service providers. TTL is in agreement with the authority's decision.

**KYC requirement:**

The authority has proposed to use UPC for identifying and matching the subscriber, porting his mobile number.

TTL is aligned with the proposed guidelines of the authority.

**Refund of unspent balance in case of pre-paid subscribers:**

Keeping in view the complexities involved in the process of refund of unspent balance, the Authority has not proposed any change in the existing process on refund of subscriber unused balance. The subscriber has to consume his unspent balance before deciding to port his pre-paid mobile number.

TTL is aligned with the guidelines of authority.

**Withdrawal of Porting request:**

It has been proposed in the Telecommunication Mobile Number Portability (Seventh Amendment) Regulations, 2018 that a subscriber can withdraw his request within 24 hrs of submitting his porting request, by sending an SMS to a designated short code. The request will be received by MNPS, which would be time-stamped and the porting process may be stopped for all requests that are received well within 24 hours.

TTL is of the view that change in the process of withdrawing MNP request within 24 hours would require changes in the system and would need a lead time for implementation.

**Reconnection of mobile numbers under NPD request:**

The authority has stated through Telecommunication Mobile Number Portability (Seventh Amendment) Regulations, 2018 that till the time the number has not been returned to the number range holder, the number can be re-activated by the MNPS once the subscriber can verify with DO and RO, the payment made within the 60 days aging period. On initiation by RO, the MNPS shall have to terminate the return process.

TTL is of the view that the above regulation can be implemented by implementing changes in the existing systems/ processes.

**Charges for Ancillary services provided by MNPS:**

The authority has proposed that Ancillary services such as Number return to the number range holder, reconnection of mobile number, bulk download of database by Access Providers and port cancellation are some of the services being rendered by MNPSs should be compensated to the MNPS.





The Authority has decided that Bulk download charges should be paid by the Access Provider for downloading the complete Number Portability database.

Port cancellation charge should be paid by the Donor operator on cancellation of port request of its subscriber.

Subscriber Reconnection Charge paid by the Recipient Operator for reconnecting the ported subscriber in its network.

The number return charge should be paid to MNPSF by the concerned Access Provider who is the number range holder.

TTL is aligned with the Authority's guidelines on Ancillary Services Charges.