



14th July, 2009

To: Advisor (MN), TRAI
 Mahanagar Doorsanchar Bhawan,
 Jawahar Lal Nehru Marg,
 (Old Minto Road), New Delhi-110002

Dear Sir,

**Syniverse Comments to
 India TRAI Mobile Number Portability DRAFT Regulations**

With regards to the TRAI Draft Regulations on MNP issued on 30th June, 2009, we are requested to send our comments by 14th July, 2009.

Clause	Comments & Recommendation
Chapter II 6.(3) "...the Mobile Number Portability Service Provider shall verify whether any porting request in respect of the same mobile subscriber number is already pending and, where it is found that an earlier request is already pending, it shall reject the subsequent request for porting and communicate such rejection to the Recipient Operator who forwarded such subsequent request for communicating the same to the concerned subscriber."	Comments:- In such case, can the MCH charge the second porting request by the Recipient? Recommendation:- The subscriber will not be eligible for refund because both Recipient and MCH have processed the request.
Chapter II 6.(5) "...the concerned Donor Operator shall, within two working days, verify such details and communicate to the Mobile Number Portability Service Provider ..."	Comments:- We understand from our last meeting that the two working days are two FULL days. Regarding to this statement, we would like to clarify what is the END TIME of a working day that the MCH can consider the order is timeout? Recommendation:- We should fix a time like 6pm, which is the common end of business time of an operator.

Clause	Comments & Recommendation
	Refer to Figure 1 below.
<p>Chapter II 6 (5) and 6 (6-b) “.....Working Days....”</p>	<p>Comments:- The working days definition needs to be captured as a part of the specifications.</p> <p>Recommendation:- We recommend Monday to Saturday to as working days. For national holidays, we would like TRAI to define clearly.</p>
<p>Chapter II 6.(6).(b) “... has failed to communicate either its clearance or its objection for the porting of the mobile subscriber number, as the case may be within the two working days ...”</p>	<p>Comments:- Does this mean that if the Donor does not respond to the MCH, the MCH will go ahead and execute the port order?</p> <p>Recommendation:- We recommend to let the MCH cancel the order rather than MCH proceeding with order execution. We feel that there might be some genuine reasons for which Donor is not able to respond to MCH.</p>
<p>Chapter II 6.(6) “... the Mobile Number Portability Service Provider shall ... (b) ... fix the tentative date and time of porting ...”</p>	<p>Comments:- Is there any specific requirement regarding the “date and time of porting”?</p> <p>In order not to affect the daily life of the subscribers under porting, porting may be scheduled at night. However, operators has concerns that the billing system is not capable to handle large number of activation and de-activation.</p> <p>Recommendation:- MCH can setup a timeout period of longer than 1 hour for Donor disconnect e.g. X hours. A Donor can disconnect the batch of subscribers and report the result to the MCH progressively</p>

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	<p>during the period. Once the MCH has got the disconnection confirmation from the Donor, it will send the connection request to the Recipient immediately.</p> <p>The “No Service Period (i.e. 2 hours as mentioned in the regulations)” can be counted from the time when the Donor confirms disconnection to the Recipient confirms connection to the MCH. Refer to Figure 2.</p> <p>To ease operators’ concern, both the Donors and the Recipients have longer time to process the orders and the systems do not need to handle too many orders within a short time period.</p>
<p>Chapter II .7 General Comment</p>	<p>Comment:-</p> <p>These two can be added as reasons of rejection by Donor</p> <ul style="list-style-type: none"> - Subscriber Number not belongs to the DNO e.g. number level table mismatch among various parties. - Different Porting Domain e.g. attempt for cross LSA porting
<p>Chapter II 7 (a) “... substantial mismatch of subscriber identification ...”</p>	<p>Comment:-</p> <p>The subscriber identification information is still open. This should be defined across the industry.</p>
<p>Chapter III 8. (5) “... after expiry of such period such subscriber fails to make payments as specified in the notice, the Donor Operator shall communicate the details of such outstanding bills to the Recipient Operator through the Mobile Number Portability Service Provider with a request to take action for disconnecting the ported number. ...”</p>	<p>Comments: -</p> <p>Does this mean MCH should support requests from the Donor for service disconnection at the Recipient?</p> <p>Recommendation: -</p> <p>As MCH does not have any value added to this communication process, we suggest that Donors directly communicate with the Recipients.</p>
<p>Chapter III 10. (9) “... The Mobile Number Portability Service</p>	<p>Comments:-</p> <p>Does this apply to porting requests only? Does</p>

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<p>Provider shall be free not to entertain any porting requests from such defaulting Recipient Operator after the expiry of such notice period till the dues are paid by it: ...”</p>	<p>this apply to “Reversal to number due to disconnection”?</p>
<p>A General Question</p>	<p>Comments:-</p> <p>When is a port order chargeable to MCH and when it is not? Here below are the list of conditions that we would like to clarify:</p> <ul style="list-style-type: none"> ○ Invalid Message Format, e.g. reference id format, maximum number of MSISDNs exceeded in the same order, ..., etc <i>(Recommendation:- Non-chargeable)</i> ○ Reference ID clashes <i>(Recommendations:- Non-chargeable)</i> ○ The same MSISDN is undergoing another porting process or number return process. <i>(Recommendations:- Chargeable)</i> ○ Logical Problem Identified, e.g. not in number plan, wrong DNO, wrong LRN, <i>(Recommendations:- Chargeable)</i> ○ A port order containing multiple MSISDNs belonging to multiple donors, and therefore a single order cannot be created at the MCH. <i>(Recommendations:- Non-chargeable)</i> ○ A cross LSA port order submitted. <i>(Recommendations:- Chargeable)</i>
<p>A General Question</p>	<p>Comments: -</p> <p>In case of termination the mobile number is returned to the number range owner holder. The current specification does not specify anything about charging on this process.</p> <p>Recommendation: -</p> <p>Mobile Number Portability Service Provider should charge the number range holder for carrying out this process.</p>

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A General Question	<p>Comments: -</p> <p>During the activation phase if Donor doesn't reply to disconnect message or Recipient doesn't reply to connect messages within the timeout period, how does the Mobile Number Portability Service Provider handle such cases?</p> <p>Recommendation: -</p> <p>In the above scenarios, the NPSP will retry the request messages and probably, MCHA will manually notify the Donor and the Recipient to resolve the issue. Upon the Donor and Recipient's consent, the port order will continue or may be ended by the MCHA manually. If such consent is not got, the port order can be ended by MCHA upon a prolonged period of time e.g. 30 days</p>

Figure 1

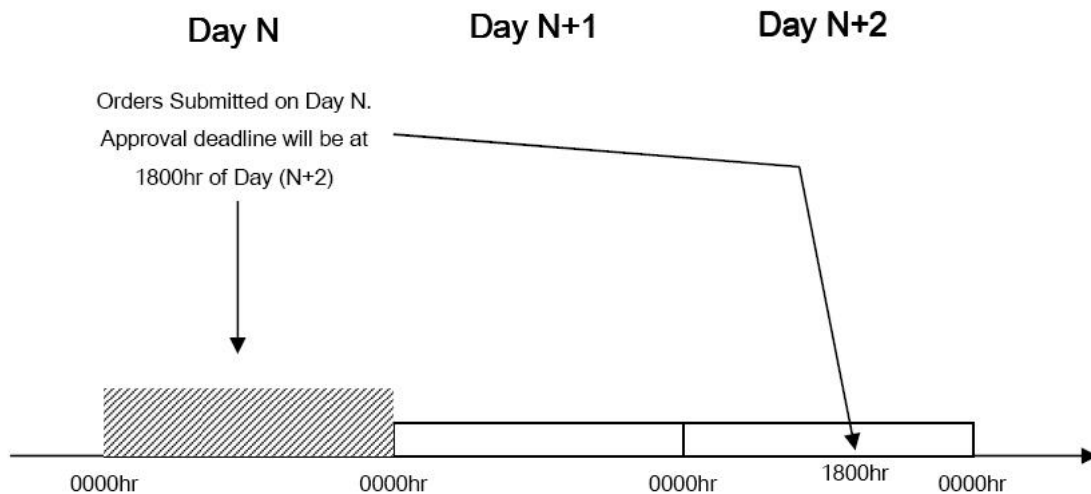
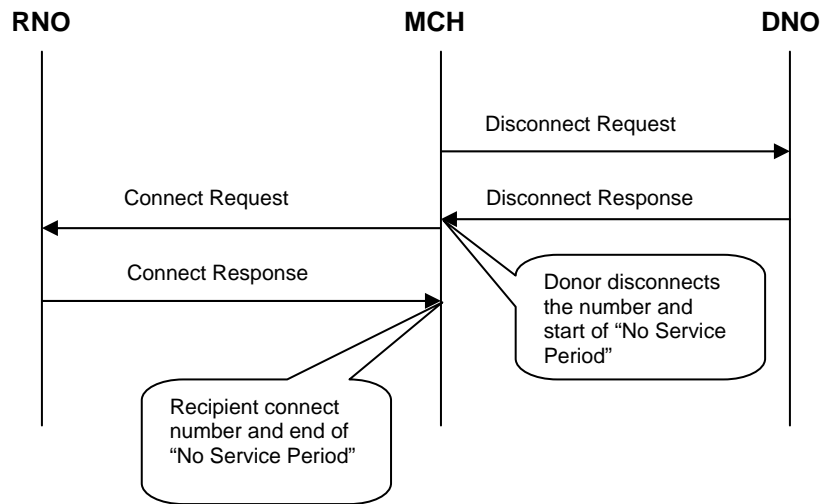


Figure 2



Yours Sincerely,

Sanjay Kasturia, Director
Syniverse Technologies (India) Pvt. Ltd.