

LM/TRAI- 03
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Telecom Regulatory Authority of India
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**Sub: Response on Draft Telecommunication Mobile Number Portability
(Fourth Amendment) Regulations, 2012.**

Dear Sir,

At the outset, we would like to draw your attention to the fact that implementations of Mobile Number Portability (MNP) in India was a very herculean task/exercise and that too with implementation of the same across 22 service areas, 180 networks and with two Mobile Network Service Providers (MNPOs).

We would also like to highlight the fact that MNP itself was a new concept for India, keeping in view India's complex and large network architecture where Telecom subscribers has crossed more than **929.37 million**, it needs more time to get the things implemented on real grounds in efficient and effective manner. Since MNP was launched in January'11, we are continuously striving very hard day by day to make the process more reluctant and smooth.

TRAI vide its Draft Regulation has proposed to put the financial disincentive on the operators for not adhering to the timelines on various counts prescribed in the MNP Regulations.

In this connection, please find our submission, as under:-

- We would like to highlight the fact that implementation of Mobile Number Portability is very complex exercise; several complex and technical issues are involved.
- The process of MNP is not a single operator dependent process and needs coordination between 2 operators and 1 MNPO for each single port-out. There is a dependence on the MNPO and other operator for various technical and process related issues.
- You would acknowledge the fact that porting systems are designed with certain limitations and at times due to various factors this porting process might get delayed. Also varies with the frequency of the porting request received, many times it exceeds system capacity.

