



AUSPI'S INPUTS TO TRAI'S PRE-CONSULTATION PAPER ON FULL MOBILE NUMBER PORTABILITY

- 1) **Inputs / comments of the stakeholders on the most optimum method for implementing Inter-Service area porting out of the three approaches discussed in this paper are requested.**

All the three approaches suggested in the pre-consultation paper by the Authority have certain issues associated with each of them while implementing full MNP using either of the approach as can be seen from the comparison chart given below.

Issue	Approach 1	Approach 2	Approach 3
Need Additional Infrastructure/ functionality by TSPs	×	√	√
Interconnectivity between databases of two MNPSPs	√	√	×
Change in MNP Process & timelines	√	√	×
Synchronization between two MNP databases	√	√	×
Change in scope of area of operation of MNPSPs	×	√	√
Capability augmentation by MNPSP	√	√	√

One approach may have the technical issues associated with it, while the other approach may face commercial or administrative challenges. However, among the three approaches given by TRAI in its paper, the second approach seems to be having larger number of complexities and challenges while implementing, as it requires additional work done and financial investments by telecom service providers and MNP service providers, which may ultimately result in increase in the cost of MNP to the subscriber.

In the light of above, we are of the view that the **second approach should not be considered for implementation at all**. Regarding the other two approaches, or any other approach which may be adopted for Full MNP implementation, we are still examining the issues in details which may arise at the time of implementation, but as per initial feasibility study, option 1 seems to be the preferred solution.

- 2) Inputs may also be provided on amendments required in the existing licence conditions of the MNP service licence, relating to scope of work, entry fee, licence fee, exclusivity period etc.**

Amendments required in the existing license conditions of the MNP service license depends on the approach adopted for the implementation of full MNP as one approach may require changes in the condition and other may not require any change. The MNPO license should be on non-exclusive basis.

Regarding the entry fee, if TRAI recommends increasing the scope of area of operation of MNP service provider to PAN India, there should not be any increase in license fee as the cost will ultimately be transferred to consumers.

We do not feel any requirement to change exclusivity condition of the existing license agreements for MNP service, if the Government decides for the approach in which these licenses remain zone-wise i.e if preferred option 1 is implemented. However, various conditions would require amendment in case Government decides to adopt approach 2 or 3 which requires increase in existing scope of area of operation.

- 3) Comments may be provided on issues related to generation of UPC by a roaming subscriber outside his service area, including generation of UPC for the subscriber desiring to/from porting in J&K service area.**

We feel that generation of UPC by a roaming subscriber outside his service area either through SMS or Call (in case of subscriber of J&K service area) to 1900 may be technically feasible. However, in roaming scenarios, the subscriber would be charged as per the situation prevailing at that time i.e. roaming tariff or none.

- 4) Comments may be provided on mechanism to be adopted for routing of calls if the number has undergone inter-service area porting.**

In case of inter-service area porting, telecom service provider's responsibility is to ensure proper routing of call to its destination in post porting scenarios. While playing the announcements *before the call gets matured*, is not technically possible. Even if some customised solution is developed, the same would lead to even more customer complaints and very annoying experience as one calling party will have to bear the same announcement, for each call attempt, to the same called/porting mobile number.

To inform a calling party, that a subscriber has been ported out of the LSA, ideally, should be the responsibility of the ported subscriber as it is subscriber's

own choice only to adopt porting of their number from one service provider's network to other, for better offerings.

Further, subscribers calling B number who has forwarded to C number which is ported to inter circle in this scenario as of today, National call forward is not allowed and this may lead to customer complaints. In case this is allowed, then STD call is applicable. For this, all operators including BSNL/MTNL need to accept call forwarding nationally and need amendment in all interconnection agreements of the operators.

- 5) **As the present regulations are formulated for porting of mobile numbers within service area, inputs may be provided regarding modifications required in the MNP regulations.**

Charges, if any, required depends on the approach ultimately implemented.

- 6) **Minimum possible testing scenarios covering the various possibilities of porting.**

While implementing intra-service area porting, the industry had conducted a very exhaustive testing of all possible call scenarios.

Our efforts in this regard should be to ensure minimum possible testing scenarios covering various possibilities of porting.

- 7) **Comment on any other relevant point related to full number portability may be provided.**

- i) **There should be a uniform process to return number to original number holder on the 16th day from disconnection date. MNPO should broadcast the number return on 16th day from the date of disconnection.**
- ii) **We have yet to analysis the situation/ firm up our views concerning national MNP vis a vis national roaming**
- iii) **To implement inter-circle MNP, there will be changes in call routing which will need increase in call processing, signalling and memory capacity in MSC, HLR and STP nodes. This will require significant investments from operators. Also minimum 6 months time should be given for implementation of the same.**
