

TRAI/03
 March 14, 2013

Mr. Sanjeev Banzal
Advisor (NSL)
 Telecom Regulatory Authority of India
 Mahanagar DoorSanchar Bhawan
 Jawahar Lal Nehru Marg
 New Delhi 110 002.

Sub.: TRAI Pre-Consultation Paper on "Full Mobile Number Portability".

Dear Sir,

This is with reference to Pre-Consultation Paper on "**Full Mobile Number Portability**" issued by TRAI, seeking comments from the stakeholders on the issues involved.

In this connection, please find our comments/suggestions as under:-

- 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.**
 - We recommend the 1st approach as the right approach as it is easier for the service providers to coordinate with the MNPS of the respective Zone.
 - Loop Mobile does not recommend Approach 2 & 3 as this involves coordination of the recipient operator with MNPS of cross zone which will lead to delay in the completion of porting process.
- 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.**
 - With respect to amendments required in the existing license conditions of the MNP service license depends on the approach adopted for the implementation of full MNP.
 - We don't feel that there is a need to change any of the terms & conditions, including the Entry Fee/ Licence Fee etc of the MNP License.
- 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 believe that generation of UPC by a roaming subscriber, outside his home service area through SMS to 1900 is technically feasible. However Call to 1900 from roaming network may technically be challenging as the roaming operators will not have direct connectivity to all operators across india and would go via NLD operator network, and the configuration of such short code may not be technically feasible.


- Further, in view of the fact that SMS & roaming for pre-paid subscribers is not permitted currently for J&K pre-paid subscribers & in view of the above limitations, we propose that generation of UPC should be allowed only when the subscriber is in his home network.
- 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, calls will have to be routed by TSP's based on LRN.
- 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.**
- Suggest that the porting time to be kept at standard 15 working days to address cross zone port cases as this will involve co-ordination between the TSP's and the MNPSP of the respective zone.
 - TSP will co-ordinate only with the respective zone MNPSP for intra service or inter service area porting in order to adhere to smooth porting within specified timelines.
- 6. Minimum possible testing scenarios covering the various possibilities of porting.**
- Testing for all possible combinations of porting scenarios across zones for "Full Mobile number Portability" will have to be carried out by all TSP's in co-ordination with the MNPSP's across cross zones.

This is for your kind consideration, please.

Thanking you,

Yours faithfully,

For Loop Mobile (India) Limited


Harish Kapoor
Chief Regulatory Officer
M: +91-9711466789