

Aircel Group Response to
Draft Telecommunications Mobile Number Portability
(5th Amendment) Regulations 2009

Issues-wise Response

Proposed Amendment 1:

- (ca) "Authorized Signatory" means the person authorised by a body corporate, firm or any organization or body to make a request in writing for the porting of corporate mobile phone number allotted to such body corporate, firm or organisation or body;
- (cb) "Corporate mobile number" means the mobile phone number allotted in the name of a body corporate, firm or any organization or body".

Aircel Response: We agree with the definitions.

Proposed Amendment 2:

- a) Allotment of distinct identification code to Corporate Mobile number in subscriber database

Aircel Response: We understand that objective is limited to identify the corporate numbers through a separate category or code. This is available for company's internal purposes and all new Corporate Mobile numbers can be tagged under a separate category for meeting Regulation objective. Sanity check can be done on existing numbers available in said category, on best effort basis.

- b) Every Access Provider shall prefix the character 'C' to the Unique Porting code generated for porting of Corporate Mobile Number.

Aircel Response: While this may not be technically infeasible however, it would require significant changes to current MNP process, which is quite stable, for inter-linking it with other databases. It is pertinent to mention it would mean that every UPC generation request would get impacted as it will need to dip into other system for establishing it to be of corporate number or individual number.

Further, clarity would be required that whether character 'C' is to be prefixed to the Operator & Service area code or the unique number of the UPC.

This would take atleast 3 months to implement.

Proposed Amendment 3:

No corporate mobile number shall be ported unless porting request is accompanied by an authorization letter (as per the specified format proposed by TRAI) issued by the Authorized signatory of the subscriber to whom such number has been allocated.

Proposed Amendment 4:

Every Recipient Operator shall on receipt of porting request ensure that CAF is accompanied by authorization letter from the authorized signatory of the subscriber of the corporate mobile number and forward within 24 hrs from the receipt of request, corporate mobile number and its UPC along with scanned copy of authorization letter to MNPSP.

Proposed Amendment 5:

Donor Operator shall reject porting requests of corporate mobile number if the same is not accompanied by an authorization letter from the authorized signatory of the subscriber

Aircel Response:

A. Infrastructure Development

Currently, the systems and interconnectivity between Aircel & MNPSP only support sending of small binary sort of data that contains fields like mobile number, UPC code etc. It does not support sending of such large size of data like scanned copy of a letter in a jpg or pdf file etc.

The current system protocols as well as the bandwidth will not support such transmission of files and any such implementation requirement would need significant investment. Moreover, such transmission should have to be standardized and adequate timeline of atleast 5 to 6 months would be needed.

We would like to request TRAI to check if any alternate solutions can be proposed, which does not hinder or destabilize the currently smoothly working MNP process flow like email-ids of Donor operator where this scanned copy can be sent to fulfill & meet objective of porting process.

B. Manual Process:

Currently MNP is a automated process and it would require careful understanding before any manual process step is introduced. It would require thorough checking of the Authorized signatory and the form issued, in order to ascertain the validity of the porting request and so that no unauthorized porting takes place. This is bound to result into subjectivity and interpretational issues.

Further, it would need 7 working days for validation of the Authorization letter or the porting request. Moreover new UPC rejection criteria's would be required to be added viz. Scan copy of image not clear or readable, scan copy not received, Authorized Signatory not valid, Authorized Signature not found, Mobile number does not belong to Corporate, Authorized signatory rejects porting request through a letter to DO etc

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