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SSTL/MNP/04-2013/23
9th April 2013

Sh. Sanjeev Banzal,
Advisor (NSL)
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg,
(Old Minto Road),
New Delhi-110 002

Subject: Comments on Draft Telecommunication Mobile Number Portability (Fifth Amendment) Regulations, 2013

Reference: Draft regulation no. : 116-4/2013-NSL-II issued on 19th March 2013

Dear Sir,

This is with reference to above, please find below comments of Sistema Shyam Teleservices Limited (SSTL) on the draft Telecommunication Mobile Number Portability (Fifth Amendment) Regulations, 2013:

- The significant changes will be required in the current systems i.e. both IT systems and business processes to accommodate the requirements proposed in the draft regulation. The changes required are of major magnitude and 30 days time to implement is impractical. We request the authority that at least 4-5 months will be required to design, develop, implement, test and put in operation along with training to CSD and distribution channel.
- There are currently 8 rejection reasons that are defined in the system; a new reason needs to be specified for rejection of the request of a Corporate customer mobile number.
- The contractual obligation clauses need to be redefined for corporate accounts by adding obligation on port out for Annual Rental Plans.
- The recipient operator can process port-in request only if the CAF is accompanied by authorization letter from Corporate authorized signatory (in TRAI prescribed format) and unique UPC and the same should be forwarded within 24 hours to MNP service provider (MCH). We wish to submit that the timeline of 24 hrs is too aggressive for port out forward by RO, it should be should be at least 4 days.
- The timeline for each step should be clearly defined for various hand-overs between donor operator, recipient operator and MNP service provider (MCH).
- The Port Out period for Corporate accounts needs to be increased from current 4 days to 15 days for a thorough verification of port out request by Donor Operator.
- The Corporate porting charges should be considered for upward revision than the current applicable charges of Rs. 19 per port out.

Sistema Shyam TeleServices Limited

A Sistema Shyam Company

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- The introduction of significant element of human intervention will lead to delayed SLAs for MNP of Corporate Mobile Numbers.
- To simplify the process we suggest to change the PORT_IN/OUT short code for Corporate MNP i.e. other than 1900.

We request the authority to kindly clarify the following points:

- The purpose of allocating unique Identification code for each Corporate Mobile Number; since currently group of Corporate Mobile Numbers are classified under unique Corporate Account.
- In case of MNP request for multiple Corporate Mobile numbers, should there be authorization letter for each number or one will suffice for group of numbers. What should be the treatment if one of the group numbers is invalid or is rejected and rest are OK.
- The validation of information by recipient operator or MCH, given by the customer pertaining to authorized signatory etc. This has potential of frauds being committed; unless the said information is shared by Donor operator and MCH validates it.
- The 'authorization letter' flow from RO to MCH and to DO.
- The bulk process is not functional at MCH (MNP Service Provider) and Donor Network Operator gets the request individually. The guidelines are required for 'Bulk Corporate port outs'.

We hope that the authority will consider our comments while framing the final regulation.

Thanking you

Yours Sincerely
For **Sistema Shyam TeleServices Limited**

Suresh Yadav
Dy. Director – Corporate Regulatory