



**Comments On**

**Draft Telecommunication Mobile Number Portability  
(Fifth Amendment) Regulations, 2013**

## Reliance's Comments on draft 'Telecommunication Mobile Number Portability (Fifth Amendment) Regulations, 2013'.

1. In the Draft Regulation under Chapter II A, the Authority has proposed the following procedure for MNP:
  - i. No corporate number to be allowed to be ported without being accompanied by **authorization letter issued by authorized signatory** of the subscriber to whom such number has been allotted;
  - ii. Recipient operator should ensure that customer acquisition form is accompanied by authorization letter. Recipient operator should forward within 24 hours of the receipt of porting request, the corporate mobile number and its unique porting code and **scanned copy of the authorization letter from authorized signatory**, to the MNPO;
  - iii. Every donor operator to reject the porting request in case it is not supported by the Authorisation letter.
  
2. RCOM **does not** find the proposed process feasible for the following reasons:
  - i. The proposed process requires scanning of Authorisation letter and sending the same to the MNP Operator. At present the complete retail chain is not equipped to handle scanning of documents and electronically transmit the same to the MNP operator. The current market conditions also do not allow to deploy additional resources to carry out required job of sending a scanned image of authorization letter to the MNP Operator;
  - ii. It would not be possible in many cases to electronically transmit authorization letter within 24 hours;
  - iii. It is important for the donor operators to establish the authenticity of authorization letter and authorized signatory by matching it with details available on CAFs. The verification process of authorisation letter and authorized signatory at present is missing in the proposed MNP process.
  - iv. As the proposed MNP process at various levels is manual requiring scanning of documents, verification of authorization letter etc, the proposed changes are unlikely to speed up the Portability process.

3. Notwithstanding RCOM's above views, it is suggested that **the proposed** definition of **'corporate mobile phone number'** should also be reviewed as it is too broad to include even small firms and businesses which are not using corporate connections/tariffs. A small grocery shop in the neighborhood using a phone in the name of the firm but on a non-corporate tariff plan would also be covered under the proposed definition. The proposed MNP process should be limited to corporate numbers only and therefore proposed definition of Corporate Mobile Phone Number should be suitably elaborated.
  4. In view of above it is suggested that new procedures which is also not tenable should **not** be mandated.
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