



COAI response to the TRAI's Draft "Telecommunication Mobile Number Portability (Fifth Amendment) Regulation 2013"

Our submission to the proposed porting process prescribed in the draft amendment regulation for the corporate mobile number is as below:

- 1) **Proposed Amendment 1: Identify and allot a distinct identification code to all corporate mobile numbers in the subscriber database.**
- 2) **Proposed Amendment 2: Prefix the character "C" to the UPC generated for porting of corporate mobile numbers.**

COAI Response:

- a) As per TRAI draft amendment to the regulation the timelines for completion of the above mentioned activity has been prescribed to be 30 days from the commencement of the Fifth Amendment of the MNP regulation.
 - b) In this regard, we would like to submit that the above proposed changes are system level changes in the existing MNP processes/ systems requiring integration of multiple systems and will require significant IT development for making this functionality operational.
 - c) **The time required for the development is at least 12 weeks.**
- 3) **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.**
 - 4) **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.**

COAI Response:

- a) **Major Up gradation is required in the IT systems in order to send the scanned copy of letter from the Authorized Signatory by the RO through the MNPO to the DO:**
 - i) The notification of the above clause would imply that Mobile operators as well as MNPSPs will need to put in place additional hardware infrastructure in CRM to build this capability as well as upgrade their connectivity to be able to transmit scanned copy of documents.

- ii) Currently, the connectivity with the MNPSP is basic low bandwidth connectivity for enabling the transmission of very simple data like MSISDN, UPC Codes, dates etc. The communication occurs through a standard SOAP messaging interface. This messaging interface is not suitable for sending scanned documents. Therefore, for transmitting such documents, an appropriate messaging protocol (e.g. FTP) would need to be agreed upon between Mobile operators and MNPSPs.

Both the point number i) & ii) would need significant investment from our member operators thus it is requested that TRAI may discuss the alternative modes (which do not need huge investment) with the telecom service providers and MNPSP's to fulfill porting request of the corporate customers.

b) **Manual process in validation of the Authorisation letter**

- i) Currently, at the time of receipt of porting request, the acceptance or rejection of each request is completely automated. The CRM has all the relevant details of the customer (including details about the contract, ownership change, court case/ legal issues etc.). Based on the relevant flags in the CRM against each MSISDN, the Porting request are suitably actioned in an automated manner. Separately, on a periodic basis, operators run manual scripts (off-line process and not linked to the porting process) against their entire subscriber base to enable or disable flags (in the CRM) as the case may be in case of any changed circumstances.
- ii) With the current draft proposal, the scanned copy of the document will reach the Donor Operator along with the Porting request and the porting clock would commence. Thereafter, the scanned document would need to be manually read and understood and also matched with the existing CAF documents as well check with the Corporate entity since, in many cases there may be a change in Authorized Signatory. This process would remain a manual process and would require human intervention and resources and cannot be automated.
- iii) It needs to be appreciated that due to the operational size of some of our member operators any manual activity, like the one proposed above, would lead to delayed responses. Even increasing the response time, which in itself would lead to other complexities, will not help in achieving 100% compliance.
- iv) We request TRAI to kindly consider above point while finalizing the regulation and also provide atleast 7 working days for the manual validation of the Authorization letter.

c) **Other Operational issues:**

In the above proposed provision, we would request TRAI to consider the following points from operational perspective while finalizing the regulation:

- i) **What will be Standard definition of Scanned Image** – colored / B&W, Resolution, file format (PDF/ TIFF/ JPEG), maximum file size (in KBs) etc. These specifications will help design the system so that operational problems will not be faced once the system goes live.
- ii) **How are cases such as unreadable or improper scanned image/ file is received from RO through MNPSP to be handled?–** these could be genuine issues but may be perceived by RO as a delaying tactic by the DO and also causing frustration to the customer.

- iii) **Policy & Duration for storage of Scanned copies of Image/ File** – regulation should clearly stipulate for what duration the scanned copies of the authorized signatory letters in received in scanned format are to be kept for compliance requirements. Recommended period is 3 months with respect to Donor operator.
- iv) **Every number belonging to a corporate will be ported out separately through a separate UPC.** However, the Authorized Signatory's letter requesting the porting will contain full list of mobile nos. It may be clarified whether or not the Authorized Signatory letter will need to be attached to each porting request or sending it with the first porting request will suffice.

We recommend that in order to avoid misuse, every such MNP request to RO should be accompanied by an original Authorization letter for respective number except for cases where entire corporate account is moving to other operator.

- v) **Whether or not rejection due to contractual obligations will be valid in case Authorized Signatory letter is received from RO by the DO** - there may be other contractual obligations (for example: minimum guarantee of number of connections for a certain period to enjoy benefits of discounted tariffs and by virtue of this porting request, the minimum guarantee condition is breached by the corporate) which also need to be considered.
- vi) Time allowed for request withdrawal by Customer at RO end would remain the same at 24 hrs or would it change for corporate.

5) 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.

COAI Response:

- a) Time allowed for Rejection at DO end as validation & authenticity of request/letter would consume more time – since this is a manual activity which involves direct coordination with the Authorized Signatory of the corporate entity, **time upto 7 working days should be allowed by TRAI.**
- b) Signature of authorized signatory's with company stamp to be available on each page (in case of multiple pages where large number of mobile numbers held by the corporate are sought to be ported, each and every page of the letter / list needs to be authenticated by the authorized signatory).
- c) New rejection codes to be built in system for Corporate customers under various heads like Unreadable scanned image 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. – this will factor in various scenarios which are valid for rejection and give clarity as to why rejection has been done. If this is not there, there will be multiple disputes between RO and DO that the rejection is invalid and will lead to delay in processing of porting requests of corporate numbers.
