

## Comments on 5<sup>th</sup> Amendment to MNP Regarding Corporate Porting, 01 April 2013

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1. We strongly recommend that for Corporate Port Requests containing multiple MSISDNs, only a single UPC be required which would apply to all the numbers in the request, rather than requiring a UPC for each number in the request.

We have implemented a similar approach in several other countries where, for a multi-MSISDN request, one of the MSISDNs is designated as the SMS-associated MSISDN. This will be the MSISDN to which the UPC is sent and for which validation will be performed

The reasons for doing so are:

- Requiring a UPC for each MSISDN places an undue burden on the Subscriber and will serve as an impediment to number portability
- It would also result in additional needless effort for the Donor Operator
- Validation could be performed just as effectively using a single MSISDN-UPC association for the entire request

2. It is not clear from the Amendment how the Authorization Letter for Porting of Corporate Numbers is to be transmitted from the Recipient Operator to the MNP Service Provider. It is also not clear whether the Authorization Letter should be transmitted to the Donor Operator directly from the Recipient Operator or from the MNP Service Provider.

We recommend the following approach for the transmission of the Authorization Letter.

- The Recipient will include a scanned copy of the Authorization Letter (pdf, jpg) as a SOAP attachment, or as a file uploaded through the GUI, as part of the Port Request message sent to the MNP Service Provider.
- The MNP Service Provider will forward the Authorization Letter as a SOAP attachment or as a file accessible through the GUI to the Donor Operator.
- The MNP Service Provider will maintain the scanned document in its database for a period only as long as necessary to complete the porting process, the attachments would not be stored in the MCH beyond that period.

The reasons for this are as follows:

- The Authorization Letter, just as any other port related data, should be transferred from one operator to another through the MNP Service Provider, for the same reasons that all information exchanges go through the Clearinghouse rather than directly from one operator to another.
- Transmission as a SOAP attachment or GUI upload is preferable to any of the alternatives (e.g. email, fax). The alternatives are more error-prone and will result in a large number of unnecessary port rejects and frustration among customers, defeating the purpose of MNP.
- The alternatives are very costly in terms of requiring personnel to manually send, receive, and track the forms, both for the MNP Service Provider and the operators.
- Transmission via SOAP/GUI not only makes it more likely that the Donor will receive the form as required but also makes it more difficult for the Donor to claim that they didn't receive the form and therefore reject the request.

3. Regardless of the approach chosen, there will be cost recovery impacts. Transmission of the form via SOAP attachments/GUI upload will require some additional development on our part and on the part of the operators, as well as performance impact analysis, the result of which may require some enhancement (additional hardware, software modification).

Alternative methods of transmission, e.g. email or fax, would also require development and testing effort, as well as increased operational costs, and these costs will need to be assessed.

Any approach will require inter-operator testing with coordination by the MNP Service Provider.