

Aug 05, 2005

Shri Pradeep Baijal,
Chairman.
Telecom Regulatory Authority of India
A-2/14 Safdarjung Enclave
New Delhi - 110 029

Subject - Scope of the Number Portability Consultation paper

Dear Shri Baijal,

This is with reference to the number portability consultation paper released by the Authority on 22nd July'05. At the outset we would like to applaud the authority for taking the initiative on the Number portability, at a stage where we intend to grow exponentially and achieve the magical figure of 250 million by 2007.

As you are aware, *a service like number portability is a fundamental prerequisite for competition in any telecommunications market.* Portability benefits subscribers and increases the level of competition between service providers, thereby ensuring best customer service, network coverage, and service quality.

Such benefits would lend themselves more relevance in hitherto and relatively more monopolistic domain of fixed services. Here, the incumbent still holds more than 98% of market share and the fact that fixed line growth is reeling under the almost monopolistic reigns of incumbents for decades now highlights the need of such regulation.

Many consumers, especially businesses, have been reluctant to change their service provider if this requires them to suffer the inconvenience and costs of getting a new telephone number.

In light of above, it is our humble submission to the authority that this consultation paper, by restricting its scope to the Mobile Segment only, severely limits the benefits that would accrue to the Indian subscribers.

We would also like to highlight the fact that the fixed line customers have been using their respective numbers for decades as compared to the mobile customers who have come into existence relatively recently. Thus, the life of a fixed line subscriber on the network has been far longer than the Mobile subscriber.

Looking from a global perspective, fixed number portability (also referred as Local number portability or LNP) has been brought in vogue by regulators almost always before the introduction of MNP. By the very nature of these services, the portability factor in principal gives real and more tangible advantages to the fixed service as compared to mobile services.

A clear evidence to this will be the case study of UK fixed Line market. Millions of subscribers have transferred their service provider under the current number portability solution providing a boost to the introduction and growth of competition in the UK telecommunications market.

We are therefore of the view, that by restricting number portability to the mobile market we are encouraging competition only in the mobile market and **accepting the dominance of Incumbents in the fixed line segment.**

We would therefore request the authority to consider this and include number portability for fixed services in the scope of consultation paper. When such a regulation gets implemented, it will come as a major respite to the millions of fixed line subscribers.

Thanking you.

Yours Sincerely,

Badri Agarwal

September 08, 2005

Ms. Sapna Sharma
Technical Officer (MN)
Telecom Regulatory Authority of India
A-2/14, Safdarjung Enclave
New Delhi 110 029

Madam

Sub: Comments of various stakeholders on the Consultation Paper on Mobile Number Portability – Clarification.

Ref: Our letter dated August 05, 2005.

This is with reference to the comments of stakeholders to TRAI's Consultation Paper on Mobile Number Portability that are available on the Authority's website.

It has been noticed that the letter dated August 05, 2005 written by Shri Badra Agarwal (President – Bharti's Fixed Line & Long Distance Business Group) has been uploaded on TRAI's website as comments received from Bharti Tele-Ventures Limited.

It is submitted that the aforesaid letter does not constitute Bharti Group's comments on the Consultation Paper on Mobile Number Portability but was only a suggestion from our Fixed Line business group, to extend the scope to the consultative exercise to include number portability in Fixed Line telephony.

We reiterate that the said letter is not the Group's response to the substantive issues raised in Consultation Paper on Mobile Number Portability. Accordingly, we would like to request the Authority take note of our position and also to clarify the same on its website.

Thanking you

Yours sincerely

For **BHARTI TELE-VENTURES LIMITED**

NARENDER GUPTA
GROUP CHIEF-REGULATORY AFFAIRS