



**DG/COAI/2023/540**  
**November 08, 2023**

**Shri. Akhilesh Kumar Trivedi**  
**Advisor (NSL)-II**  
Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan,  
Jawaharlal Nehru Marg,  
New Delhi – 110002

**Subject: COAI Response to TRAI Draft Telecommunication Mobile Number Portability (Ninth Amendment) Regulations, 2023**

Dear Sir,

This is with reference to the TRAI “Draft Telecommunication Mobile Number Portability (Ninth Amendment) Regulations, 2023” issued on 27<sup>th</sup> September 2023.

In this regard, please find enclosed herewith COAI’s response to the Draft Regulation.

We hope that our submission will merit your kind consideration and look forward to your valued support on the same.

Thanking you,

Sincere regards,

Digitally signed  
by Lt. Gen Dr. SP  
Kochhar  
Date: 2023.11.08  
15:03:42 +05'30'

**Lt. Gen. Dr. S.P. Kochhar**  
**Director General**

Copy to:

1. Shri V Raghunandan, Secretary, TRAI, Mahanagar Doorsanchar Bhawan, Jawaharlal Nehru Marg, New Delhi – 110002.
2. Shri Rajiv Sinha, Pr. Advisor (NSL), TRAI, Mahanagar Doorsanchar Bhawan, Jawaharlal Nehru Marg, New Delhi – 110002.



## Response to TRAI Draft Telecommunication Mobile Number Portability (Ninth Amendment) Regulations, 2023.

We thank the Authority for providing us with the opportunity to submit our response on the “TRAI Draft Telecommunication Mobile Number Portability (Ninth Amendment) Regulations, 2023.”

**Q1. Whether it would be appropriate to introduce an additional criterion for rejection of the request for allocation of Unique Porting Code (UPC) in respect of any mobile connection, which has undergone the process of SIM swap/ replacement/ upgradation? Kindly provide a detailed response with justification.**

**&**

**Q2. If your response to the Q1 is in the affirmative, kindly provide detailed inputs on the draft amendment regulations given above.**

### COAI Response

- a) Yes, we agree with the introduction of an additional criterion for rejection of the request for allocation of Unique Porting Code (UPC) in respect of any mobile connection, which has undergone the process of SIM swap/ replacement in the last 10 days.
- b) This step will help to certain extent in preventing fraud or a situation where a potential perpetrator could commit a fraud and then port to another service provider. Thus, it gives the subscriber the time to contact the telecom service provider and address any concerns. This step enhances security, empowering customers **to safeguard their mobile numbers and deal with potential threats promptly.**

**Q3. Stakeholders are requested to provide detailed inputs with justification on the DoT’s proposal that – (a) after the generation of UPC code, at an appropriate stage, the demographic details of the subscriber such as Name, Gender, Date of Birth and Photograph, etc., or scanned copy of Customer Application Form (CAF)/ Digital CAF may be transferred from Donor Operator to Recipient Operator. To avoid time delays, such transfers may preferably be done through electronic means; and (b) the recipient operator should match the demographic details of the subscriber with those details received from Donor Operator. If the subscriber’s demographic details match, then only further steps in MNP process may be allowed otherwise, the porting process may be terminated.**

### COAI Response

- a) All our member TSPs are of the view that exchange of CAF is not at all feasible. CAF has lot of information which may not be relevant and may not serve the purpose thereby leading to unnecessary confusion.
- b) Our members will be responding individually to the TRAI regarding matching the demographic details.



**Q4. Are there any suggestions /comments on any other issues for improving the process of porting of mobile numbers? Please provide a detailed explanation and justification for any such concerns or suggestions.**

**COAI Response:**

N.A.

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