

## **Counter Comments from MITS Zone 2 on Consultation paper on Review of Mobile Number Portability (MNP) Process**

This is with reference to the TRAI consultation paper on Review of Mobile Number Portability (MNP) Process, released on April 06, 2018. Response from MITS was submitted to TRAI on May 02, 2018.

Based on the comments received from the stakeholders (Service Providers, Associations, etc.) on the issues raised in the consultation paper, please find below counter comments from MITS for your reference.

**Q1. Would it be appropriate that MNPS be assigned the task of generating and communicating the Unique Porting Code (UPC) to the subscriber intending to port his mobile number as proposed in the consultation paper?**

**(and)**

**Q2. If you agree to assign the task of UPC generation to MNPSs, whether the revised process outlined in the consultation paper is appropriate to address the relevant issues being faced in the existing MNP process?**

Counter comments from MITS Zone II: Based on the comments received on this issue, it seems there is a resistance within the industry barring a few neutral members to adopt a new and an efficient UPC process. From an implementation point of view, the MNPS would face similar challenges as the operators but we believe the new process will help in resolving the ongoing issues.

Stakeholders have mentioned in the comments that since inception ~351M ports were processed and number of UPC generated would be even higher. While the operators have generated and delivered the UPCs to facilitate the high port volume, still there is a period, where an operator goes out of business and subscribers face issues in even getting the UPC. We agree that not everyday operators go out of business but our submission is there has to be a universal process that works perfectly in all situations. MNPS is capable to handle the generation of UPC and this process is successfully followed in other countries. As it is suggested by operators that TRAI should introduce QoS parameters in relation to UPC management, the same can be applicable on the MNPSs and we would be able to comply with them. We would like to highlight another advantage: MNPS will ensure the UPC is always validated in the port process. There have been cases where due to no response / inactivity from the operators, the port request goes through without UPC validation. This will help in preventing cases of fraudulent porting. It will also be beneficial for subscribers / operators as they would have to deal with less of such cases which are painful and time consuming.

**Q6. Whether MNPSP should be compensated towards the cost of generation and delivery of UPC to the subscriber through SMS? If yes, what mechanism can be adopted?**

**(and)**

**Q18. Should the MNPSPs be allowed to charge for the ancillary services such as number return and bulk database download by TSPs? Please provide your comments with justifications.**

Counter comments from MITS Zone II: We are surprised to see the comments from some of the stakeholders which states that the per porting charge applicable for the MNPSP is still on the higher side and should be further reduced further to Rs. 2. Just like an operator network, the MNPSPs also maintain a central clearinghouse, its operations & maintenance, enhancements (driven by industry and regulatory requirements) and have similar license fulfilment responsibility just as any other license entity. The existence of MNPSP is already threatened with completed port charge of INR 4. The question of any further reduction does not arise, however, TRAI should increase the per port tariff considering the while porting process is undergoing a major change through this consultation process. We would request TRAI to review during this consultation process the increase in Per Port Tariff and also make it applicable on port request receipt basis instead of completed port as MNPSP's do provide service by processing the request irrespective of whether the port has been completed or not.

We would also like to highlight that during the calculation of the per port charge, nowhere the ancillary services such as number return, bulk download and non-payment disconnect request were taken in consideration. These are extra services that require a different set of message exchange between the MCH and operator gateways. MCH engage both physical and logical resources to enable and provide benefit to the industry through this service. It goes without saying that number return and non-payment disconnect request bring a financial benefit to the operators and bulk downloads help in giving an operational benefit. MNPSPs should be compensated for the extra ancillary services as it does not form part of Per Port Transaction charge being paid by operators. MNPSP's have been providing these services for free so far but with the steep reduction in tariff it is not feasible to continue providing these services for free. MNPSP's have to deploy additional resources to provide these services and therefore should be paid for the same.

**Summary:** We would humbly like to submit that MNPSP have always supported TRAI and the industry by providing excellent services even in period of high port volume. This has benefitted the operators and empowered the subscribers. We are already suffering financial losses on account of a massive tariff reduction by TRAI and any further reduction / non-compensation will have serious implications on our existence and forced to exit the business. An appropriate increase in per port transaction charge for port request along with the reasonable charges for ancillary services should be provided by TRAI to the MNPSPs