

RJIL/TRAI/2017-18/676
December 29, 2017

To
Mr. Kaushal Kishore,
Advisor (F&EA)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawaharlal Nehru Marg
Old Minto Road
New Delhi -110002

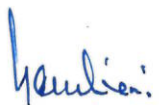
Subject: Comments on Draft Regulations dated 18.12.2017 on “The Telecommunication Mobile Number Portability per Port Transaction Charge and Dipping Charge (Amendment) Regulations, 2017”

Dear Sir,

Please find enclosed herewith comments of Reliance Jio Infocomm Limited on the draft regulations on “The Telecommunication Mobile Number Portability per Port Transaction Charge and Dipping Charge (Amendment) Regulations, 2017” dated 18.12.2017, for your kind consideration

Thanking you,

Yours sincerely,
For **Reliance Jio Infocomm Limited**,


Kapoor Singh Guliani
Authorised Signatory



Enclosure: as above.

**RELIANCE JIO INFOCOMM LTD'S (RJIL) Comments on TRAI's
Draft Telecommunication Mobile Number Portability per port
Transaction charge and dipping charge (Amendment) Regulations, 2017**

1. At the outset, we thank the Authority for issuing this draft Amendment to discuss the reduction in the per port transaction charges under the Telecommunication Mobile Number Portability ("MNP") Per Port Transaction Charge and Dipping Charge Regulations, 2009.
2. As mentioned by the Authority, per port transaction charge was fixed in 2009 basis the estimated financial data and other information submitted in 2009 by the two Mobile Number Portability Service Providers ("MNPS"). As the MNP was introduced in the country in 2009 and is successfully operating for a long time now, clearly it is high time that the charges arrived based on estimated numbers be verified against the actual financial numbers.
3. The financial data provided by TRAI in the explanatory memorandum to the draft regulation clearly shows that the estimated cost was much higher than the actual costs incurred while the estimated number of porting requests was much lower than the actual porting requests received. Consequently, the per port transaction charge is much higher than the actual expense incurred leading to excess recovery by the MNPSs over the years. Number of actual porting requests received had increased more prominently since July 2015 when the full MNP was introduced in the country. In view of this, we support the Authority's proposal of passing the benefits of less cost to the consumers by reducing the per port transaction charge. We submit that the Authority should also take into consideration the excess recovery over the years and reduce the charges further lower than the proposed Rs 4/- per port transaction. Further, during bulk porting done by customers during closure of services in some service areas by a TSP no port transaction charges should be levied because the customer does the porting not out of his volition but is forced so as to continue his mobile connection.
4. RJIL has always supported the consumer centric measures taken by the Authority including the measures that lead to reducing the cost of telecommunication service for the common man. We submit that the Authority should continue exploring such measures to bring down the entry barriers to avail telecom service as these are always instrumental in increasing the teledensity and helpful in increasing the rural penetration.
5. It is also pertinent to point out here that the 2009 Regulation envisaged a review of the per port transaction charges post one year of the regulations coming in force with actual cost data and porting pattern, however no changes in the per port transaction charge have been proposed for over 8 years. We submit that the Authority should implement a regular and time bound process for review of such charges.
6. RJIL proposes that a review of the per port transaction charge should be carried out every three years. Three years is an appropriate time for the porting patterns to emerge and stabilize, as well as for the collecting actual cost from MNPSs. The Authority has already followed the three year cycle for other financial reviews like Interconnection Usage



Charges and the same cycle can be adopted for the review of MNP per port transaction charges.

7. In view of the above, RJIL supports the reduction of the per port transaction charge. We further submit that this charge can be brought down further taking into account excess recovery made by MNPSs over last few years. We also request the Authority to institutionalise the review of per port transaction charges with a periodic review every three years. This will help ensure that the benefits of scale and technological innovations are passed on to the consumers in right earnest.

