



VIL/LT/17-18/ 302
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Telecom Regulatory Authority of India,
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Jawahar Lal Nehru Marg, Old Minto Road,
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Subject: TRAI Draft Telecommunication Mobile Number Portability Per Port Transaction charge and Dipping Charge (Amendment) Regulations, 2017

Dear Sir,

This is in reference to the above-mentioned draft Regulation, issued by TRAI on 18.12.2017.

In this regard, we broadly support the COAI's submissions made to TRAI on the above-said subject. Further, we submit as follows:

- It is high time that such per port transaction charge (PPTC) which was set almost 9 years back in 2009, is brought down. As noted in the consultation paper, there is almost 10 times increase in the number of porting requests i.e. from 64 lakh in 2010-11 to 636 lakhs in 2016-17.
- If the recent closure of certain services etc. by some TSPs is to be accounted for, then the count of porting request will be much more than that in 2016-17 even. As per Telecom subscription data released by TRAI for Nov'17, almost 160 lakh porting requests have been submitted in one month only. This is leading to windfall gain to MNP operators at the cost of such charge to subscribers/TSPs.
- The systems put in place by MNP operators i.e. centralized IT based software applications and hardware will not have proportionate incremental cost compared with the huge increase in volumes.
- In consumer's interest, TRAI has also been issuing directions in such cases of closure of services, thereby allocating additional service provider's codes for UPC, increase in UPC validity and exempting checks of age on network etc.
- We also request TRAI to reconsider submissions made earlier to recommend to DoT for allowing RO to claim PPTC paid by it to MNPO as deduction from Gross revenue while arriving at AGR for the purposes of payment of license fee.

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Therefore, we request:

1. PPTC to be brought down to a level of Rs. 2.00 (Rupees two).
2. In case of large volumes of porting requests due to closure of services, PPTC should be reconsidered and further brought down to fraction of above-said charge.
3. PPTC paid to MNP Operators, to be recommended to DoT for allowing it as deduction while arriving at AGR for license fee purposes.

We hope above will merit TRAI's kind consideration and support, please.

Thanking you,

Yours sincerely,

For **Vodafone India Limited**



Sundeep Kathuria
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