

bharti airtel ltd.
india & south asia
airtel center, plot no. 16,
udyog vihar, phase - IV,
gurgaon - 122 015

www.airtel.in
call+91 124 4222222
fax +91 124 4248063



April 9, 2013

Shri Sanjeev Banzal
Advisor (NSL)
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi -110002

**Subject: Comments on draft 5th amendment to the MNP
Regulations 2009**

Dear Sir,

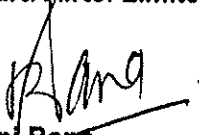
This is with reference to TRAI 5th (draft) amendment to the MNP regulation issued vide file No. 116-4/2013-NSL-II dated 19.03.2013 regarding mobile number portability procedure for Corporate mobile phone numbers.

In this regard, please find attached herewith Airtel comments on the draft regulation, as Annexure – I.

We hope that our comments / suggestions will merit your kind consideration while finalizing the regulation.

Thanking you.

Yours faithfully,
For **Bharti Airtel Limited**


Ashwani Rana
Vice President
Head – Regulatory Operations

Encl: a.a.

Bharti Airtel's comments on the DRAFT 5th Amendment in MNP Regulations, 2013, pertaining to porting of Corporate connections

Bharti Airtel Ltd supports TRAI's decision to amend the MNP Regulations pertaining to porting of Corporate Customers. We believe this amendment will smoothen the porting process for corporate customers as this will bring in greater degree of transparency and result in increased customer satisfaction.

While carrying out the proposed amendment in the existing MNP Regulations, there are some operational points / issues which need to be clarified in the proposed amendment so as to achieve the end objective of smoother porting process in an automated manner for corporate customers. The proposed amendment seeks to bring transparency in the porting process for corporate customers through an automated workflow through the Number Portability Gateway - this calls for major changes on existing systems as there is considerable IT development involved and it is requested that appropriate time be given so as to get these changes implemented.

Listed below are some of the critical aspects which need to be borne in mind while amending the MNP regulation:

Proposed Amendment 1: Identify and allot a distinct identification code to all corporate mobile numbers in the subscriber database.

Proposed Amendment 2: Prefix the character "C" to the UPC generated for porting of corporate mobile numbers.

The above proposed changes are system level changes in the existing MNP processes / systems and will require IT development for making this functionality operational.

The time required for this development is around 8-10 weeks after notification by TRAI.

Proposed Amendment 3: No corporate mobile number shall be ported unless porting request is accompanied by an authorization letter (as per the specified format proposed by TRAI) issued by the Authorized signatory of the subscriber to whom such number has been allocated.

In the above proposed provision, we would request TRAI to consider the following points from operational perspective while finalizing the regulation:

- Every number belonging to a corporate will be ported out separately through a separate UPC. However, the Authorised Signatory's letter requesting the porting will contain full list of mobile nos. It may be clarified whether or not the Authorised Signatory letter will need to be attached to each porting request or sending it with the first porting request will suffice. We feel that sending this Authorised Signatory letter with each porting request will unnecessarily load the system as well as delay the whole process and thus is uncalled for.

Recommendation: DO will check whether the Authorisation Letter has been received from the corporate's Authorised Signatory with the first porting request. Each such letter with numbers contained in it will be valid for next 48 hrs during which time all numbers mentioned in the letter should have been punched in for porting by the RO.

- There should be clarity with respect to how cases such as unreadable or improper scanned image/ file if received from RO through MNPSP are to be handled?- these could be genuine issues but may be perceived by RO as a delaying tactic by the DO and also causing frustration to the customer.
- Policy & Duration for storage of Scanned copies of Image/ File - regulation should clearly stipulate for what duration the scanned copies of the authorized signatory letters in received in scanned format are to be kept for compliance requirements. Recommended period is 90 days as this is the minimum eligibility required for porting a number.
- Whether or not rejection due to contractual obligations will be valid in case Authorised Signatory letter is received from RO by the DO - there may be other contractual obligations which also need to be considered - for example: minimum guarantee of number of connections for a certain period to enjoy benefits of discounted tariffs and by virtue of this porting request, the minimum guarantee condition is breached by the corporate.

Proposed Amendment 4: Every Recipient Operator shall on receipt of porting request ensure that CAF is accompanied by authorization letter from the authorized signatory of the subscriber of the corporate mobile number and forward within 24 hrs from the receipt of request, corporate mobile number and its UPC along with scanned copy of authorization letter to MNPSP.

In the above proposed provision, we would request TRAI to clarify the following while finalizing the regulation:

- Receiving of Scanned Authorisation Letter from MNPSP within 24 hrs should be in online mode through MNPSP from RO. If this is kept in online mode, the same can be tracked easily at different stages of the workflow which is otherwise not possible in an offline mode (through emails).
- Since the Authorised Signatory letter from the Corporate Customer will be received through a scanned image, it will be appropriate if the specifications (file format, maximum size, etc) of the same are defined so that these are uniformly implemented by all operators otherwise there will be compatibility issues resulting in delays / failures which can be avoided once the system goes into production environment.
- Time allowed for request withdrawal by Customer at RO end would remain the same at 24 hrs or would it change for corporate.
- Sending the scanned copy of letter from the Authorised Signatory by the RO through the MNPO to the DO: This proposed change will require an upgrade as it calls for integration of documents in the MNP port in flow for corporate customers - accordingly these call for major changes in the IT systems. It is estimated that this will take approximately 6-8 months to implement these changes post testing once the specifications are known and this is notified by TRAI.

Proposed Amendment 5: Donor Operator shall reject porting requests of corporate mobile number if the same is not accompanied by an authorization letter from the authorized signatory of the subscriber.

- Time allowed for Rejection at DO end as validation & authenticity of request/letter would consume more time - since this is a manual activity which involves direct coordination with the Authorised Signatory of the corporate entity, time upto 7 days should be allowed by TRAI for corporate mobile numbers instead of existing 4 days as allowed for retail customers.
- Signature of authorized signatory's with company stamp to be available on each page (in case of multiple pages where large number of mobile numbers held by the corporate are sought to be ported, each and every page of the letter / list needs to be authenticated by the authorized signatory).

- New rejection codes to be built in system for Corporate customers under various heads like Unreadable scanned image received, Authorized Signatory not valid, Authorized Signature not found, Mobile number does not belong to Corporate etc - this will factor in various scenarios which are valid for rejection and give clarity as to why rejection has been done. If this is not there, there will be multiple disputes between RO and DO that the rejection is invalid and will lead to delay in processing of porting requests of corporate numbers causing customer dissatisfaction and complaints.

A handwritten signature in black ink, appearing to be the initials 'RA' with a large, sweeping flourish extending to the right.