

Aircel/TRAI/Corr/2015/ २२

February 06th, 2015

Shri Sanjeev Banzal

Advisor (NSL)

Telecom Regulatory Authority of India

MTNL Telephone Exchange Building

Jawahar Lal Nehru Marg (Old Minto Road)

New Delhi – 110 002

Sub: Response to Draft Telecommunication Mobile Number Portability (Sixth Amendment) Regulations, 2015”

Dear Sir,

This is with reference to TRAI’s Draft Telecommunication Mobile Number Portability (Sixth Amendment) Regulations, 2015” dated 23rd Jan’2015.

In this regard, we hereby enclose our response to the above mentioned draft Regulation. This response has also been sent through e-mail at advmn@trai.gov.in; and trai.mn@gmail.com;

We hope TRAI will take our inputs into consideration.

Yours Sincerely

For Aircel Limited and Dishnet Wireless Limited



Ramesh K

Sr. General Manager –Corporate Regulatory Affairs

Encl: as stated above

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AIRCEL Group Comments to TRAI's Draft Telecommunication Mobile Number Portability (Sixth Amendment) Regulations, 2015, dated 23rd January 2015

1. Clause 1 of the Draft Regulation

Aircel response:

We would like to highlight to the TRAI that Industry has already represented with DoT vide its letter dated 31.12.2014 and 21.01.2015 (copy marked to TRAI as well), and requested for at least 8 month time from the date of final regulation issued by TRAI in this regard. There are numerous systems which would have to undergo changes to cater to the Full MNP scenario coupled with a fact that these are not additional features which have to get developed but, change in the architecture of identification of a mobile number and its circle, treating and implementation within the IT systems.

Further, the modifications required in porting process would be known and frozen with TRAI regulation, which means that changes in systems related to porting can only be finalized once TRAI regulation is available. Furthermore, the MNPOs have also not provided with final specifications as well as changes in porting process.

All these changes would take considerable time, expected to be approx. 8 months from the date of final regulation and after which, the inter-operator call & process testing would need to take place.

Therefore, considering above and Industry's detailed proposal to DoT dated 31.12.2014 and 21.01.2015, we request TRAI to also consider and support timeline of 8 months from the date of its final regulation for operators to get ready with the systems.

2. Clause no 7 of the Draft Regulation

Aircel response:

We support this step of DO informing the RO through MNPO about the payment received. However, there has been instances where in the customer has not been able to pay the outstanding within the said 15 days due to travel outside the service area etc. These instances would increase in case of Full MNP as the customer would be seeking porting from one service area to other. We recommend that the 15 day time period should be increased to 30 days.

Similarly, regulation number 15, sub-clause 3) of existing MNP regulation should be modified to the extent that RO should give a notice of 30 days to the customer in case of an outstanding amount with Donor Operator.

3. Clause no 8 of the Draft Regulation

Aircel Response

We appreciate that TRAI has proposed reduction in timeline for number reversal process. The industry is facing severe numbering recourse crunch and every effort should be made to reduce the number



reversal timeline to the extent possible. The ported-in number after getting disconnected is not required to be put on hold in any system and there should be effort to immediately return the same.

Moreover, the prepaid numbers, wherein there is no concern of any outstanding bill etc; the number should be immediately returned i.e. in 15 days of disconnection.

Therefore, we request that the number reversal process should happen

- a) 45 days of disconnection for postpaid ported-in number and
- b) 15 days of disconnection of a prepaid ported-in number.

4. Undertaking from customer on ownership:

Aircel response:

The issue is adequately addressed through the terms and conditions contained in the existing CEF as well as the DoT's verification guidelines. In case any subscriber furnishes incorrect information, the connection is liable to be disconnected. We recommend that there is no separate need for an undertaking and adequate safeguard are already built into the process.

Other Points not covered in Draft Regulation:

1. Reduction in Compliance benchmark of activation/deactivation of porting request:

We as well industry has represented to TRAI earlier as well that it is not possible to achieve 100% compliance in respect of 2 hour timeline for activation/deactivation of a porting request. There are several factors including complexity of architecture/systems, network outages, planned downtimes, software/hardware upgrades etc, which lead to such delays.

Therefore, we request TRAI to kindly consider the compliance benchmark as 95% within 2 hours for the purpose of imposition of financial disincentive.

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