



PB/VIL/08  
6 February 2015

**Telecom Regulatory Authority of India**  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg (Old Minto Road)  
New Delhi -110002

**Kind attention:** Shri Sanjeev Banzal, Advisor-NSL  
**Subject :** Draft Telecommunication Mobile Number Portability (Sixth Amendment) Regulation,2015  
**References :** TRAI's Consultation Paper dated 23<sup>rd</sup> January 2015

Dear Sir,

This is in reference to the above captioned Consultation Paper.

Please find attached herewith Vodafone inputs (as Annexure-1) on various issues for your consideration please.

Yours sincerely,  
For **Vodafone India Limited**

**P. Balaji**  
Director- Regulatory & External Affairs

**Vodafone India Limited (CIN-U32200MH1992PLC119108)**

7th Floor, DLF Centre, Sansad Marg,  
New Delhi - 110 001, India. T +91 11 7171 0766, F +91 11 7171 0767  
Regd. Off.: Peninsula Corporate Park, Ganpatrao Kadam Marg, Lower Parel, Mumbai - 400 013, India  
T +91 22 7171 5000, F +91 22 2496 3645, Website: www.vodafone.in

## **Vodafone submissions on the Draft MNP Regulations for enabling Full (Intra-Circle) MNP**

### **1. Timelines for the Implementation of Full MNP**

DoT has announced the Full MNP policy on 3<sup>rd</sup> November, 2014 with the implementation timelines as 6 months ie Full MNP to go live by 3<sup>rd</sup> May, 2015.

Basis our previous experience of 2010/2011, the development and implementation activities by operator will begin after the final regulation is announced and thereafter the MNPOs have shared the final specifications for their platform and the processes.

Additionally we have experienced that, during the process changes made for accommodating the Corporate porting, all operators had not been able to 'go live' on the same date and the implementation was done in a staggered manner.

In the case of Full MNP, unlike the Corporate porting process, it is a much more complex and critical implementation with considerable testing requirements and therefore all operators have to implement it together (including newer operators who are expected to launch their services in the upcoming months).

The testing process is still under discussions with DoT. We are heartened to note that DoT has indicated that only incremental testing is required. Notwithstanding that, we are still not in control of the test process and therefore are not in a position to assess the testing timelines.

We have conducted the feasibility analysis and the planning work has been completed for the implementation of Full MNP. However the Capex investment, equipment/ hardware ordering, vendor quotation activities will flow consequent to the freezing of the technical specification by the MNPOs which would be consequent to the final regulation. For eg. the draft regulation has suggested an innovative solution for the NPD process. This module would need to be taken into consideration while freezing the specification post the announcement of the final regulation.

In light of the above, we are in agreement with the Joint Industry response to this draft regulation that we would require more time than the current timeline of 3<sup>rd</sup> May'2015.

### **2. Non Payment Disconnect (NPD)**

In our experience of the past four years the NPD process, although applicable only to Postpaid customers, has thrown up the maximum challenges to us as both the Donor Operator (DO) and also as a Recipient Operator (RO).

As RO, we have faced issues of customer not being able to confirm payment (to DO) within the stipulated time. There have also been cases of customer insisting to be re-activated after having made payment beyond the stipulated time.

Additionally, with the launch of Full MNP, we believe that there would be a requirement for some additional time by the customer to make good the payment since the customer has shifted his place of residence. An additional issue to be considered is that, in case of the current Intra-Circle MNP, since the subscriber is not necessarily changing his address, the despatch of the last bill, any other correspondence and physical engagement for collection would also be at the same address. In the case of Full MNP, the DO would not be aware (officially) of the new address of the customer.

In light of the above, we propose the following:

**(a) The NPD timeline to be increased from the current 15 days to 30 days.**

(b) From the perspective of improving the NPD process, we are in agreement with the proposal of introducing a feedback mechanism by the DO in regards to having received the payment. However, we recommend a deeper analysis on the technical requirement for implementing this – the amount of complexity involved and the impact on the timelines.

(c) It has been our experience that both the MNPOs have adopted different processes in the treatment of NPD cases. One MNPO notifies an automated 'Deemed Disconnection' message on the 15th day (in case of no response from the RO) and the other MNPO keeps the transaction open and keeps on waiting for the response from the RO.

**We propose that both MNPOs should follow the same process and we recommend that the RO should positively respond within the stipulated timeline and the MNPOs should not notify the automated 'Deemed Disconnection' message on their own.**

(d) We have also had cases of the DO having raised the NPD, however, post the 90 day cooling period, the customer managed to port out once again. In such cases, the outstanding invariably converts to a bad debt.

**Therefore we strongly recommend that for cases where an NPD request has been raised, the MNPO should configure a code in their systems which would disallow any further porting.**

(e) The existing regulation has not provided any time-limit for raising the NPD request. Due to this, we do receive several NPD requests after a long gap from the activation date. Delayed NPD requests tend to cause customer inconvenience and leads to unpleasant interactions.

**Therefore, we propose some discipline in this process and we request the regulation place an outer limit of raising the NPD request within 90 days of the Deactivation date.**

### 3. MNP rejection by MNPO on 'Age on Network' (AON) grounds

The regulation mandates that a customer has to remain with a particular operator for a period of 90 days before availing the MNP route for changing operators. However, this limit of 90 days is the ceiling limit and if the operator desires to permit a customer to leave earlier, it is the operator's prerogative.

However, we have observed that the MNPO has also configured their systems/ software to reject the MNP porting request on their own, on the basis of their own porting history records.

In the past, there have been several instances where due to some extreme customer issues or ownership issues, we have tried to repatriate the number back to the earlier operator, but failed due to the MNPOs software configuration.

**We strongly recommend that the AON check by the MNPO be disabled and the MNP request should seamlessly flow to the DO for the DO to take a call whether to reject or permit the porting.**

### 4. Handling of ownership related issue

There is no requirement of increasing the documentation by taking an additional undertaking. This will make the subscriber acquisition process more cumbersome. In-fact the undertaking is already incorporated in the CAF Terms & Conditions.

The ownership issue, whenever it has arisen, has been resolved by cooperation amongst operators. Once it is established that the identity of the customers are not matching (between the DO and the RO), there is no challenge in disconnecting the number at the RO level.

The challenge (as explained in our previous point) is faced in repatriating the number back due to the fact that the MNPO rejects the return on grounds of age being less than 90 days. Once the previous recommendation is accepted by the Authority, we believe that this issue would stand resolved.

**Therefore, there is no need for an additional undertaking since it would only add to the process and make customer acquisition more complex and would not add any further value to the process. We are in agreement with the joint industry response on this.**

### 5. Number return process

**We are in agreement with the Authority's proposal of reducing the timelines for the return of the disconnected numbers (to the number range holder) from 90 days to 60 days.**