

To,

Dated: February 03, 2015
No.SVR/FY15-16/MNP/FMNP/001

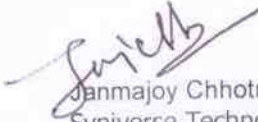
Advisor (NSL-II)
Telecom Regularity Authority of India,
Mahanagar Door Sanchar Bhawan,
J.L.Nehru Marg, (Old Minto Road),
New Delhi -110002

Subject: Draft Telecommunication Mobile Number Portability (Sixth Amendment) Regulations, 2015

Dear Sir,

This is with reference to TRAI's draft regulation on the Subject Matter on dated 23-Jan-2015. In this regard, kindly find enclosed our comments for your kind consideration.

Yours Sincerely,



Janmajoy Chhotroy, Chief Technical Officer
Syniverse Technologies (India) Pvt. Limited.



Syniverse Comments on TRAI draft regulation on Mobile Number Portability (Sixth Amendment) Regulation, 2015

Syniverse Technologies welcome the authority's initiative for seeking comments on draft regulation on Mobile Number Portability (Sixth Amendment) Regulation, 2015. Detailed Response as follow:

1. Point No 5 - Improving of existing process of handling non-payment disconnections

Syniverse Response:

Any failure or delay by a DONOR to cancel a Nonpayment suspension request would risk the subscriber of being disconnected at the Recipient Operator.

Purpose of the suggested change is to allow a subscriber enough time to clear his dues and provide proof to Recipient Operator to avoid any disconnection, the existing Nonpayment Suspension order answer wait period of 15 days may be increased to 30 days. This shall provide 30 days for a subscriber to clear his outstanding dues and provide the proof to RO to remain active, instead of following up with Donor Operator to issue a cancellation request for earlier Nonpayment suspension request raised.

Since the subscriber has been ported out to the Recipient, the Donor will not have the motivation to send the Cancel Nonpayment Suspension Request timely. With an extended timeout period, we believe that the existing process can serve the purpose already.

2. Point No 6- Handling of Ownership related issues

Syniverse Response:

As a good practice an undertaking from the subscriber may be collected by RO along with CAF form and RO. However these undertakings shall not be used as authorization criteria for porting.

To handle similar situation, the Singapore industry agrees that such undertaking form is needed and shall be retained by the Recipients. Only when a customer complaints, the Recipient shall send the scanned documents on email/fax to the Donor for verification within X days.