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To,

Advisor (NSL-II),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
(Old Minto Road), New Delhi-02

(Kind attention: Sh. Syed Tausif Abbas)

No: Regln/317-1/2016/ 6426

Dated: 9th May, 2018

Sir,

Sub:- Comments on Consultation paper on "Review of Mobile Number Portability (MNP) Process".

Kindly refer to your office press release 20/2018 dated 6th April, 2018 regarding Consultation Paper on "Review of Mobile Number Portability (MNP) Process". In this context, kindly find herewith the BSNL comments on the above mentioned Consultation Paper:

Q1. Would it be appropriate that MNPSP be assigned the task of generating and communicating the Unique Porting Code (UPC) to the subscriber intending to port his mobile number as proposed in the consultation paper?

Comments: Yes, it will act as catalyst for easing the porting process.

Q2. If you agree to assign the task of UPC generation to MNPSPs, whether the revised process outlined in the consultation paper is appropriate to address the relevant issues being faced in the existing MNP process?

Comments: Process as proposed in the Consultation paper is feasible and justifiable with respect to customers but software solution is needed to be upgraded/ customised to cater the new solution of the aforesaid consultation paper.

Q3. Do you suggest any other methodology which can address the issues being faced in the existing MNP process? Elaborate your answer.

Comments: Following methodologies apart from existing SMS based system, like OTP based URL portal or missed call based system etc. may be considered.

Q4. How can KYC information available with DO be verified during the MNP process to avoid fraudulent porting? Please elaborate.

Comments: A new field for KYC can be added in port request. When RO will create port-in request they will enter the KYC information of DO obtained from the customer. Same KYC information will be validated at DO end in negotiation phase.

Example:- Suppose a customer has completed his/ her KYC with service provider. Service provider will provide a unique KYC id to the customer which will be validated during port process similar to UPC.

Q5. What are the challenges in implementing the proposed MNP processes / framework on the part of stakeholders' viz. TSP (as DO and RO) and MNPSP? Elaborate your answer.

Comments: Process as proposed in Consultation Paper is feasible and justifiable with respect to customers but present software is needed to be upgraded or customised to cater the solution.

Q6. Whether MNPSP should be compensated towards the cost of generation and delivery of UPC to the subscriber through SMS? If yes, what mechanism can be adopted?

Comments: TRAI to consider.

Q7. What would be the appropriate mechanism to reinforce the accountability and role of MNPSP in the proposed scenario?

Comments: Regular reporting mechanism to be in place for monitoring the system so as to be applicable uniformly for all TSPs.

Q8. What could be the mandatory obligations on part of the MNPSP?

Comments: Mandatory obligations on part of the MNPSP could be as follows:

- Timely delivery of UPC to call customers.
- Sharing UPC to DO on real time basis.
- Validation of UPC during port process.
- Validation of E-KYC.
- Uniform applicability for all TSP.

Q9. In the event of large scale disruption or sudden shutdown of network, what could be the appropriate alternative mechanism to ensure delivery of UPC and completion of porting process?

Comments: Methodologies like URL portal maintained by MNPSP based on some validation may be considered apart from existing SMS based system.

Q10. (a) Do you agree with the process for transfer of the prepaid balance to the subscriber's account as described in the consultation paper? What changes do you envisage in licensing/ regulatory framework to enable the provision? Please elaborate your answer.
(b) If the above process is not agreeable, please suggest alternate mechanism.

Comments: This feature may not be practically feasible.

Q11. What should be the regulatory requirements to monitor efficacy of the provision of transferring the unspent pre-paid balance? Please elaborate your answer.

Comments: Technical implementation will be challenging and may not be feasible as commented in Q.10.

Q12. In the proposed scenario of reduced MNP timelines, should the validity of the UPC be reviewed? If yes, what should be the period of validity of UPC? Please elaborate your answer with justification.

Comments: No, the existing validity to continue.

Q13. Whether it would be appropriate to review the existing structure of UPC? Please elaborate your answer with justification.

Comments: No such requirement is felt.

Q14. If you agree to above, does the proposed structure as discussed above adequately serve the purpose or would you suggest any other mechanism? Please elaborate your answer with justification.

Comments: Not applicable.

Q15. Should the provision of withdrawal of porting request be done away with in the revised MNP process? Please state your answer with justification.

Comments: No, some cancellation process should be there as there will be always some customer who can opt for it. But the problem of RO not initiating cancellation is needed to be monitored. And some process should be implemented where MNPS can directly cancel the port request at both RO and DO end based on customer request. Example: SMS based cancel request from customer.

Q16. What additional changes do you envisage in the MNP regulations? Elaborate your suggestions.

Comments: NPD should be validated by MCH. MCH should validate Bill date and Due date. The bill date should not be more than 60 days old. If DO initiates NPD with bills more than 60 days old that should be rejected by MCH and not pushed to RO.

Q17. Due to the difficulty envisaged, should the subscriber be allowed to reconnect his mobile number even after number return process is initiated? If yes, what could be the criteria? Please elaborate suitable method.

Comments: Yes, Customer may be given one more chance to reconnect his mobile number after number return process is initiated. In such case, customer requests to reconnect his mobile number after paying his dues towards DO within 30 days of disconnection, then his case should be considered favourably by RO.

Q18. Should the MNPSPs be allowed to charge for the ancillary services such as number return and bulk database download by TSPs? Please provide your comments with justifications.

Comments: These are integral feature of MNP process. TRAI to decide.

Q19. Would the new technologies, such as blockchain, be helpful for facilitating faster and transparent MNP process? What can be the possible advantages and challenges? Please elaborate.

Comments: Fresh updated technology within framework in Indian rules may be agreed.

Q20. If there are any other issue(s) relevant to the subject, stakeholders are requested to offer comments along with explanation and justifications.

Comments: No.

Yours sincerely


Ved Prakash Verma
AGM (RegIn-II)