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To,
The Secretary,
TRAI, Mahanagar Doorsanchar Bhawan,
Old Minto Road, New Delhi- 110 002.

Sub.: Number portability and problems there of.

Dear Sir

I came across consultation papers and suggested regulation for MNP.

I would request you to consider following issues which I think has remained unaddressed.

1. Addressing problem of network locked handsets: As you are aware all major CDMA operators sells network locked handset. Since they either charge premium for similar handsets sold in open market for GSM or sell at almost at same price at comparable GSM handsets. Means if CDMA user, if not satisfied with his current CDMA service provider, he will not be able to port his number to other CDMA operator as again he has to buy another handset. It is worth mentioning here that CDMA handsets by standards need not to be locked. It was demand of major operators in US and later it became way to earn for CDMA operators. This issue may be over come by following:
 - a. By making compulsory to sell unlocked and RUIM based handsets only. This regulation infact should be applicable to both CDMA as well as GSM operators
 - b. All non RUIM handsets sold before regulation must be unlocked by operator if subscriber wishes to port his / her number to other CDMA operator free of cost.
 - c. Operator may be asked to make changes in their system so that they can program handsets over the air (OTA) all handsets which do not belong to their network.
 - d. If at all operator has to sell locked handsets initially, they must be unlockable - by codes provided by operator and procedure should be simple enough for subscriber to follow. This model is followed by European operators - very widely.
2. Operators by regulation restricted to charge excessive for handsets. There are examples where handsets sold here tags almost double than that of USA. I remember HTC 6700 Pocket PC, sold by reliance at Rs. 32000 where as same handset in US without any contract was sold at US \$ 350. Same was PPC 6600 by TATA was sold at Rs. 30000 at the time when it was already obsolete in US and was sold by US operators at less than US \$ 200. Such practices should must be strictly banned in order to encourage number portability. Even recently same applies for Blackberry handsets sold by both GSM and CDMA operators.

3. Portability of number should be across the technologies and across the operators without any restrictions.
4. Also it should not restrict type of customers viz .: Prepaid and postpaid.
5. Document requirement should be minimum for porting number.

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