

To,

Dated: Aug 22, 2017

No: SVR/FY-17/MNP/TRAI/002

S T Abbas,
Advisor (Network, Spectrum and Licensing)
Telecom Regularity Authority of India,
Mahanagar Door Sanchar Bhawan,
J.L.Nehru Marg, (Old Minto Road),
New Delhi -110002

**Subject: Comments on Draft Telecommunication Mobile Number Portability
(Seventh Amendment) Regulations 2017**

Dear Sir,

This letter is with reference to TRAI draft Telecommunication Mobile Number Portability (Seventh Amendment) 16th August 2017.

With regards to UPC being forwarded to clearing house at the time of creation, Syniverse would like to raise couple of issues on subject matter:

1. For some technical reasons if Donor MNP Gateway is down and failed to forward generated UPC's to clearing house, for such cases clearing house will reply as "UPC Mismatch" to the Recipient operator gateway since UPC is not available at clearing house.

This will create a bad customer experience for the end user, Syniverse would like to recommend for cases where Donor for some reasons failed to forward UPC to the clearing house let the clearing house forward all such request to the Donor and that the Donor shall reject/accept depending on the UPC entered by the Recipient operator.

2. Considering the complexity of the solution and large number of UPC's/MSISDN's that are to be stored by clearing house, Syniverse would like to bring to your attention the changes that are to be made at clearing house and the timelines for same.
 - a. Additional Hardware
 - i. Hardware Procurement : 16-20 weeks (Aggressive timeline)
 - ii. Hardware Installation, Configuration : 2-3 weeks
 - b. Application Design Changes & New message implementation : 12-16 weeks
 - c. Inter Verification Testing : 2 – 4 weeks

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- d. IOT testing with Service Provider on MCH Staging – Depend on Operator's Gateway
Readiness : 4- 6 weeks

As per Syniverse internal analysis report GO Live of such a complex change will take anywhere between 9-12 months, we request TRAI to take the timeline into consideration before finalizing on the implementation date.

3. Considering the statement in section 5 of the Explanatory Notes Syniverse does not expect that the rate of errors generated at point of sale will differ with the new process. However, the error rate reported by the Donor Network will decrease because the errors due to incorrectly reported or entered UPCs or expired UPCs will be prevented from reaching the donor. Accordingly, there may be a decrease in the number of porting requests raised due to expired UPCs unless the subscriber repeats the act of getting a new valid UPC at the point of sale.
4. Syniverse would like to suggest for Non Payment Disconnect (NPD) cases allow Clearing House to validate Bill Due date only from Donor Operator instead of adding new following fields – including date of the bill, amount outstanding, last date of payment, date of the notice and period of notice given to the subscriber. This shall ensure faster deployment and cost effective solution for Service providers and clearing house. Only the due date of the bill is truly relevant to the Recipient operator in that it is overdue, the amount of the bill, amount outstanding, date of last payment, notice date and period of notice are details best left between the donor network and the subscriber to settle.

Yours Sincerely,



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

