

**Tata Teleservices Limited and Tata Teleservices (Maharashtra) Limited
Response to the TRAI Consultation Paper on Determination of Port
Transaction Charge, Dipping Charge and Porting Charge for MNP**

Q1:- Whether the network elements, cost details and the cost structure considered for estimating the port transaction charges are appropriate? If not, give reasons.

- There is a major difference in the estimated cost & subscriber base assumptions of the two MNPOs.
- MNPO 1 has assumed a CAPEX model & MNPO 2 has assumed an OPEX based model.
- To have greater clarity and analyze the reasons for the variation it is required that both MNPOs list down the line items on the Capex and Opex side.
- A more accurate estimate can be arrived at by seeking the above details from both the MNPOs.
- We recommend that both the MNPOs should work together and share more details, eventually working out common cost details that should end up in lower per port transaction charge.

Q2:- Do you agree with the factors affecting the number of porting as discussed in chapter-4? Please indicate if any additional factors are required to be taken into account.

Few more factors to be considered in addition to the factors highlighted by TRAI

- Cost of Porting
- Time taken to Port
- Business rules governing porting
- Porting lock in period (90 Days)
- Customers awareness on availability of MNP
- Launch of services by New Operators
- Quality of Service offered by current service providers

Q3 Whether the projection of the subscriber base and annual rate of porting as explained in the paper for the next 5 years is reasonable? If not, give your estimation of annual porting rate along with the reasons.

- There is a huge variation in the subscriber base projections of the two MNPOs .
- With the current tele-density & rollout of services by new operators, the subscriber base projections by the two MNPOs seems very conservative.
- A uniform approach needs to be followed by both MNPOs for estimating the annual rate of porting.

- Studying the trend in countries where MNP has been implemented, it has been observed that porting rate increases at a gradual rate. The actual porting rate in countries where MNP has been implemented & the estimate taken by the MNPOs is as below-

	1 st Year	2nd Year	3rd Year	4th Year	5th Year
Actual Average Porting Rate for first 5 years in countries where MNP has been implemented	3.16	5.51	5.77	5.09	5.88
Estimated Average Porting Rate as per licensee 1	2.00	2.00	2.00	2.00	2.00
Estimated Average Porting Rate as per licensee 2	0.56	2.10	2.84	3.54	4.30

- The porting rate in India may be higher as MNP implementation coincides with launch of new operators.
- Based on the above facts & statistics available both MNPOs need to rework the annual porting rate & subscriber base projections.

Q4 Based on the cost details, what is your estimation of per port transaction charge? Justify your estimation and supplement it with the worksheets.

- At the present time it is difficult to estimate the exact transaction charges due to lack of detailed cost information and significant variation in the cost structure provided by the two MNPOs.
- However based on the number of ports expected as per the average porting rate for the first 5 years in countries where MNP has been implemented it should be approximately half of what the Licencees have projected.

Q5 What should be the time period for review of per port transaction charge?

- It is recommended that the port transaction charges be reviewed regularly like review of other charges by TRAI (eg. Interconnect Usage Charges). To begin with the port transaction charges may be reviewed annually.

Q6 What is your estimation about the number of voice/SMS/MMS dipping which may take place in the MNP service provider's Query Response System?

- The number of voice / SMS / MMS dipping depends on the operators using the NPDB maintained by MNPOs.
- There may a decrease in dipping percentage once the operators start maintaining their own number portability database.
- It is recommended that Dipping charge be decided by a mutual agreement between Individual operators & MNPOs.

Q7 What should be the factors which may be considered for the estimation of the Dipping charges.

Factors determining dipping charge -

- Cost of installation & maintaining NPDB.
- Number of service providers who will use the NPDB & volume of calls / SMS / MMS generated by these operators.

Q8 (a) Whether the recipient operator should be allowed to charge the porting charge from the porting subscriber?

- The recipient operator has to incur several expenses in porting in & making the services available to the subscriber porting in .Thus it is recommended that the recipient operator should be allowed to charge porting charge from the subscriber.

Q8 (b) If yes, should porting charge be equal to or less than or more than the per port transaction charge? Give reasons to justify your view? (c) If no, give reasons to justify your view.

- The porting charge should be equal to the per port transaction charge. However, the decision to charge the actual porting cost from the customer is to be left to the discretion of the recipient operator.

Q9 Whether the porting charge, if any, paid by the subscriber to the recipient operator, should be shared with the donor operator? Give reasons to justify your view.

- We recommend that the per port transaction charge should be equal to the porting charge charged to the customer. Hence no amount should be shared with the donor operator.