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Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg (Old Minto Road)  
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**Subject** : Vodafone Idea Limited response to the draft Telecommunication Mobile Number Portability (Seventh Amendment) Regulations, 2018  
**Reference** : TRAI draft Telecommunication Mobile Number Portability (Seventh Amendment) Regulations, 2018 dated 25<sup>th</sup> September 2018

Dear Sir,

This is in reference to draft Telecommunication Mobile Number Portability (Seventh Amendment) Regulations, 2018 dated 25<sup>th</sup> September 2018.

At the outset, we are thankful to the Authority for considering our earlier submissions related to withdrawal of porting through SMS and giving more time for processing of corporate porting requests, this step will lead to a better consumer experience and satisfaction. We strongly feel that consumer's satisfaction and his faith in the MNP process is of utmost importance. The consumer interest and choice are fundamental issues and the consumer must have adequate opportunity to exercise the right choice and not be misled or forced to make instantaneous decisions. It should be an informed decision by consumer considering all the factors.

We would also like to submit that we have given our detailed comments/response to the TRAI Consultation Paper on Review of Mobile Number Portability (MNP) process, which should be considered before implementing the proposed amendment.

In addition to the above, our comments/observations on the draft amendment are as follows:

#### **1) Withdrawal of Porting Request**

The proposed amendment allows the subscribers to cancel their porting request by sending SMS to a short code to the MNPSF within 24 Hrs. from the time the MNPSF received request from the Recipient Operator.

However, before making withdrawal request the subscriber is required to know when the porting request has been received by the MNPSF from the respective RO and also when his/her DO has received such request from the MNPSF, which is important from customer's perspective as the customer generally approaches his/her current operator (DO) for queries or continuity of his services. Therefore, we propose that the timeline of 24 hours should start from the time when DO receives the information about porting request from MNPSF and the MNPSF should inform the subscriber through SMS on receipt of porting request (with date and time) from the RO as well at the time of sending such requests to the DO (if there is time lag and it is not on real time basis), and the subscriber be given liberty to send the withdrawal request within 24 Hrs from the time when his/her DO receives the porting request. Further, in case the customer raises the request for porting withdrawal after the defined timeline of 24 hours, MNPSF should inform the customer as well as the DO through SMS before processing of his/her porting request.

Apart from the above, we would also like to suggest that upon the withdrawal request made by the customer, the UPC generated by the customer shall also become invalid. This step is important as the RO

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may misuse and resubmit the same request again as UPC is valid for few days and in order to stop this misuse it is imperative that UPC is nullified.

## 2) Porting of Corporate Mobile Numbers

- (i) **Distinct Identification Code:** Under the proposed amendment under Regulation 5, the Authority has mentioned that the MNPSP shall identify and allot a distinct identification code to all the corporate mobile numbers. We understand that the distinct identification code for corporate number denotes the prefix 'C' which is being used while generating UPC for Corporate numbers and there is no separate identification code is required to be generated by the MNPSP. Thus a clarification may be issued in the amendment that:

*Provided that the Mobile Number Portability service provider shall -----*

*(a) identify and allot a distinct identification code to all the corporate mobile numbers denotes by Prefix 'C' and each mobile number needs to raise a distinct UPC request (addition)*

- (ii) It is submitted that bringing the outstanding payment check before the generation of UPC by MNPSP stage, will lead to an increase in outstanding payment exposure from present 4 working days of porting window to additional 4 days (till UPC validity period). The COCP connections whose bill generation date falls in between the UPC generation and the actual porting date may lead to an additional exposure. You will appreciate that outstanding payment exposure in case of COCP is much higher than in the case of individual customer. Thus, the outstanding payment check should be done additionally on receipt of porting request by the Donor Operator. If the bill gets generated in between then the DO should reject the porting request and upon rejection communicate the date of bill generation along with outstanding amount to MNPSP.

Further, it is submitted that the customer is fully aware of the date of bill generation as the bill cycle is static and not dynamic. Also, for customer convenience an SMS alert is sent to the consumer upon generation of bill. The aforesaid process will prevent any misuse of porting by the customer.

- (iii) MNPSP should reject the porting request wherein the UPC is generated with Prefix 'C' but authorization letter not annexed/shared by the recipient operator (RO) and also in cases wherein the UPC is not prefixed with 'C' but the authorization letter shared by the RO.

We would also like to suggest that the check related to subscriber's age on network before generation of UPC should remain with the Donor Operator.

## 3) Charges for Ancillary services provided by MNPSP:

With reference to the proposed insertion of Clause (bb) in Regulation 2 related to ancillary service charge, we would like to submit that the stated ancillary services such as number return, bulk database download and non-payment disconnection request are existing since inception of MNP regime. The Per port Transaction Charge of Rs. 4 which the MNPSP gets from the RO fully covers all the costs as borne out by clause 1.8 of the amendment to Telecommunication Mobile Number Portability per Port Transaction Charge and Dipping Charge Regulations dated 31.01.2018 which clearly mentioned that the per port transaction charge is based on the '**total cost**', which means that all the cost associated with the ancillary services mentioned in the draft amendment has already been fully covered under the per port transaction charge. Further, the viability issue of MNPSP was duly examined and considered during the said amendment and there is no reason for them to raise this issue again and ask for separate charges.

## 4) Reconnection Charges under NPD request

We welcome the proposed provision for subscriber reconnection as it will allow the RO to re-activate the ported in number even after disconnection provided that the subscriber approaches the RO within sixty days from the date of such disconnection. However, we would also like to mention that reconnection of

number is purely between the subscriber and the TSP, for which the re-provisioning needs to be done by the TSP only and we don't see any role to be played by MNPSPP, hence there is no reason for paying reconnection charges to the MNPSPP. Therefore we propose that the said clause be removed in the final Regulation.

We request you kind consideration and support on our above submissions.

Thanking You

Yours Sincerely,

For **Vodafone Idea Limited**



**Vineet Kumar**  
Vice President - Regulatory Affairs