

National Mobile Number Portability

Before making any decision on implementing Mobile Number Portability across states or at National level we strongly recommend the Authority to study the percentage of people who migrate from one service area to another service area and on top of it who actually want to retain the same number. As implementing the same involves a lot of money as well as time, a detailed study should be conducted by the Authority to know the approximate number of customers actually wanting to opt MNP at National Level. Also for a long run it is important to analyse what impact the facility will have on future tariffs, as the cost of implementation will get amortized across the board even on those who would never want to opt for MNP facility. Therefore we are of the view that before making any further decision on this subject, it's important to do a Cost Benefit Analysis.

Below is our input/comment on the entire subject of implementing MNP at National Level –

First let us list down the reasons why people opt for Mobile Number Portability –

In our view people/customers opt for MNP because of the following reasons

- Dissatisfaction with the current service provider – Most of the times customers feel that their respective service provider fails to provide cost effective quality service
- High Tariff - At times customer feels that he is being unreasonably charged for the calls/SMSes or any other service etc.
- Technology – Customer wants his/her CDMA number to be retained at GSM Number

What is MNP?

MNP allows a subscriber to retain his mobile telephone number when he moves from one Access Provider to another irrespective of the mobile technology. In the current scenario, MNP allows a subscriber to retain his mobile telephone number when he moves from one Access Provider to another irrespective of the mobile technology or from one cellular mobile technology to another of the same Access Provider. Currently, the facility of MNP is restricted to the licensed service area only. Presently, MNP is extended for intra circle basis only. However, in accordance with the provisions contained in the National Telecom Policy-2012 regarding "One Nation – Full Mobile Number Portability", TRAI received a reference from DoT, seeking the recommendations of MNP across Licensed Service Areas that is Inter – Circle areas.



In view of the same, we strongly recommend that before Authority proceeds with this provision of providing Full Mobile Number Portability, it's important to know the percentage of people who migrate from one service area to another service area and on top of it who actually want to retain the same number. We believe that 85%-90% being of the pre-paid category who don't even move across the village or town level would want to have the same number as a migrant labour.

Authority has to find out what is the percentage which would really want to port out from Delhi to say Bangalore. Authority should conduct a survey/study to know how many people would want to port out of a service provider in a particular licensed service area. Let's say, a customer based out of Delhi wants to retain his number and opts to port out. Additionally he/she is willing to use the same number in Mumbai on the network of Mumbai based service provider. It is imperative to study the type of subscribers and demographics of the subscriber base that would actually want to use MNP facility between two different licensed service areas. Unless that is established, a huge sum of money will be put on implementation of the same when just miniscule of people would actually require/use the facility.

Also another important point to be noted is that one of the key strategies/objectives mentioned in the recently released National Telecom Policy-2012 is to review national roaming charges with the ultimate objective of removing the roaming charge across the nation. No roaming charge could result in a lower dependence on the need for National Number Portability (NNP).

In our view, alternate measure such as 'Call Forward' is the most appropriate measure in addressing the issue of National Mobile Number Portability –

Call Forward – Porting customers can opt for 'Call Forward Facility' if in case they want to use the same number (outside the licensed service area) along with the new number in new service license area. For example if a Delhi based customer wants to shift to Mumbai and he wants to retain the same number in Mumbai. He can simply take a new number in Mumbai from any service provider he/she prefers and then just use the 'Call Forward' application on his/her handset. This facility will automatically transfer all calls being received on his old number (Delhi number) to his new number (Mumbai Number). This will enable the user to receive all calls coming on his old number without using National Mobile Number Portability provided the user would have to pay roaming charges for incoming calls.



Issues for Consultation

1. Inputs / comments of the stakeholders on the most optimum method for implementing Inter-Service area porting out of the three approaches discussed in this paper are requested.
2. Inputs may also be provided on amendments required in the existing licence conditions of the MNP service licence, relating to scope of work, entry fee, licence fee, exclusivity period etc.
3. Comments may be provided on issues related to generation of UPC by a roaming subscriber outside his service area, including generation of UPC for the subscriber desiring to/from porting in J&K service area.
4. Comments may be provided on mechanism to be adopted for routing of calls if the number has undergone inter-service area porting.
5. As the present regulations are formulated for porting of mobile numbers within service area, inputs may be provided regarding modifications required in the MNP regulations
6. Minimum Possible testing scenarios covering the various possibilities of porting.
7. Comment on any other relevant point related to full number portability may be provided

Combined Answer for Questions1-7: -

We are of the view that implementing MNP at a national level would be a waste for tax payers as the cost of implementation will get amortized across the board even on those who would never want to opt for MNP facility. In view of the same, we strongly recommend that before we proceed with this provision of providing Full Mobile Number Portability, we need to know the percentage of people who migrate from one service area to another service area and on top of it who actually want to retain the same number. We believe that 85%-90% being of the pre-paid category who don't even move across the village or town level would want to have the same number as a migrant labour.

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We believe that the below mentioned measure is the most appropriate in addressing the issue of National Mobile Number Portability –

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