MTS response on "TRAI Pre- Consultation Paper on Full Mobile Number Portability"

At the outset, we welcome the opportunity given to comment on the issues raised in pre-consultation paper on Full Mobile Number Portability.

Our issue wise submission is as herein below:

Q1. **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.**

We wish to submit that all three approaches proposed by TRAI have certain pros and cons associated with each approach. We further wish to submit that the approach having least complexities and requiring minimal changes in the existing infrastructure should be adopted. We would like to inform that approach 2 is the most undesirable approach as it requires significant changes and investment of the mobile service providers and MNP service providers.

Keeping the aforesaid in view we are of the opinion that as per initial examination the Approach 1 seems to be the preferred approach requiring minimum changes and complexities.

Q2. **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.**

The amendments related to interconnectivity, synchronization of database, security and process related in the existing license condition of the MNP service licence will depend on the type of approach being adopted.

Q3. **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.**

We wish to submit that there is no challenge from technical perspective with respect to generation of UPC through SMS by a roaming subscriber outside the service area. However, we would like to submit that in case the UPC is generated outside the service area, the roaming charges for such SMS would be applicable as per the roaming rates.

Further, having regard to the enormous inequality in the market share and the presence of the new operators with an obvious significantly lower footprint has left the balance of power to negotiate the commercials tilted, irrevocably in favour of the incumbent operators. Therefore, to bring in a sustained development and to ensure level playing field, the operators should be mandated to have inter-operator roaming agreements with each other and the wholesale rate i.e. the inter-operator roaming charges should also be regulated.

Q4. Comments may be provided on mechanism to be adopted for routing of calls if the number has undergone inter-service area porting.

There is no solution that is currently available for playing pre-call announcement to differentiate whether the number is in parent service area or the number has undergone inter service area porting. Therefore in case if a subscriber makes a call to the number that has already completed inter service area porting successfully, playing a pre-call announcement will not be possible.

The subscriber will face dialing pattern issue in case of inter service area porting since the subscriber needs to prefix '0' to the dialed number. The solution feasibility for implementing this in MSC needs to be explored / figured out.

At present the call facility restriction of local or STD is done on the basis of number series. Post implementation of full mobile number portability, this mechanism will not work. The technical solution needs to be worked out for implementing the restriction based on LRN & feasibility of the same needs to be taken up with equipment vendors for a workable solution.

It is pertinent to mention that in implementation of inter-service area mobile number portability, there would be changes in call routing which require increase in call processing, signaling and memory capacity in MSC, HLR and STP nodes. Further, implementing aforesaid call routing changes would require significant investments from operators. Moreover a minimum of three to four months time should be given for implementation of the same.

Q5. 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.

The modification required in the MNP regulation will depend on the type of approach adopted in implementing full mobile number portability.

Q6. Minimum Possible testing scenarios covering the various possibilities of porting.

The testing scenario should be bare minimum by grouping the operator's in 3-4 groups & each group having 2-3 operators.

Accordingly testing to be performed in phases as follows:

- ❖ Phase-1
    - Inter-Service Area (Intra-operator within the MNP Zone)
    - Inter-Service Area (Intra-operator across the MNP Zone)

- ❖ Phase-2
    - Inter- Service Area (Inter-operator within the MNP Zone)
    - Inter- Service Area (Inter-operator across the MNP Zone)

Q7.   Comment on any other relevant point related to full number portability may be provided.

As per present practice call forwarding is within the service area numbers only and the same is implemented on the basis of number series. Post implementation of full mobile number portability, there would be an issue to identify the forwarding number based on MDN series for Intra & Inter Service Area.

The MNP database is increasing day by day which will further increase post implementation of full mobile number portability. We suggest having a common database for the purpose of querying by all operators for call processing.

Further, the A-number based restriction should be removed at interconnect Trunks of POIs, if any, because post implementation of proposed full mobile number portability, any number could be operational in any network.