

23.02.2013

To
The Advisor (NSL)
THE TELECOM REGULATORY AUTHORITY OF INDIA
Mahanagar Doorsanchar Bhawan
(next to Zakir Hussain College)
Jawaharlal Nehru Marg (Old Minto Road)
New Delhi - 110 002

Ref.: Pre-Consultation Paper on Full MNP, Dated 20.02.2013

Sub.: Inputs on consultation paper on Full MNP

Sir,

In reference to above mentioned pre-consultation paper my self Sanjay K. Agrawal, in the capacity of subscriber of mobile services provided in India, wish to submit following comment/suggestion to strengthen and make MNP services more consumer friendly.

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.

No input/comments offered

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.

No input/comments offered

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.

No input/comments offered

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

No input/comments offered

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

Rule 6 of Mobile Number Portability Regulations 2009 stipulates eligibility criteria for a subscriber to be eligible to make porting request, among others sub-rule (a) provide for 90 days prohibition period.

“(a) a period of ninety days has expired from the date of activation of his mobile connection in the case of a mobile number not ported earlier; or from the date of activation of his mobile number after its last porting, in the case of a mobile number which has been ported earlier, as the case may be;”

In cases where service provider withdraws services, 90 days condition in both situations i.e. activation & last porting should be relaxed. This is not a hypothetical situation we can take actual case of Aircel-

Recently Aircel withdrew services from Nagpur. No prior notice to this effect was served to customers and 90 days prohibition policy amplified consumer's woes many fold, neither their number was ported nor any mobile service was available on their number till 90 days period expired, for no fault on their part.

Hence it is suggested that suitable clarification /direction /amendment be notified to ensure mobile services is available to customer at the earliest in the event of service provider withdrawing services from his local area.

On item B. 'Timelines of MNP process' of consultation paper:

It is about three years MNP is made applicable throughout India and it can be safely presumed that service providers & their executives are now well acquainted with MNP process. To increase efficiency & customer service I am of view that time line of 15 days in selected areas & 7 days in rest of India for MNP process should be reduced at least for MNP request within LSA.

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

No input/comments offered

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

On D-(19) of consultation paper:

In the event when a subscriber makes a call on a number which has been ported out of LSA-

Calling subscriber can be informed by announcement to this effect for pre-defined number of days, say 90 days from the date porting.

Or

Responsibility can be entrusted on Recipient Operator to verify and if incoming call is generated from the service area from where the number is ported then an announcement to calling subscriber can be made RO informing that called number is ported to other service area and call may be chargeable to STD rates by his service provider.

8. Other relevant issues

- a) It is observed that, in order comply with eligibility criteria stipulated in sub-rule (b) of Rule 6 of 2009 Regulations, subscribers are required to pay lump-sum amount to cover unbilled amount till date of porting, in addition to unpaid bill/s if any, by Donor Operator and once the number is ported Donor Operator is not returning residual amount to subscriber.

It is requested to issue directions /guidelines on time period within which Donor Operator is required to return residual amount to subscriber after porting.

Thanking you.

Yours sincerely



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