



TVR/VIL/058
8th April' 2013

Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg, Old Minto Road,
New Delhi - 110 002

Kind Attention: Shri Sanjeev Banzal, Advisor (NSL)

Subject: Draft Telecommunication Mobile Number Portability (Fifth Amendment) Regulations, 2013

Dear Sir,

This is with reference to the draft Amendment issued by the Authority on 19th March 2013 on the captioned subject.

We are pleased to submit our comments and views on the draft Telecommunication Mobile Number Portability (Fifth Amendment) Regulations, 2013.

We hope that our submissions will merit your kind consideration.

Thanking you,

Sincerely yours,

T. V. Ramachandran
Resident Director
Regulatory Affairs & Government Relations

Copy to : Dr. Rahul Khullar, Chairman, TRAI
: Shri R. K. Arnold, Member, TRAI
: Dr. Vijayalakshmy K. Gupta, Member, TRAI
: Prof. H.S. Jamadagni, Member, TRAI
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Vodafone's response on draft telecommunication Mobile Number Portability (Fifth Amendment) Regulations, 2013

At the outset we would like to submit that any proposed process of porting corporate numbers must address privacy and confidentiality concerns in the corporate accounts. The corporate accounts are sensitive in terms of the business and commercial aspects and the sensitivity of porting these connections increases as the Authorized Signatory is different from the user. The Authorized Signatory, with whom the Donor Operator has entered into the agreement for the connections, may never come to know of the porting request raised and submitted by the user himself or by any other person. It is imperative for the Donor Operator (DO) to take confirmation from the Authorized Signatory, authorized as per the Donor Operator's agreement with the corporate. DO is within his rights to authenticate with the corporate customer represented by the Authorized Signatory for the porting request raised and in case there is any mismatch or non-confirmation then the porting request should be rejected by the DO accordingly. We request that any proposed porting process must address this concern.

Further, the implementation of this process would also imply that Mobile operators as well as MNPSs will need to upgrade their connectivity to be able to transmit scanned copy of documents. Currently, the connectivity with the MNPS is basic low bandwidth (2mbps) connectivity for enabling the transmission of very simple data like MSISDN, UPC Codes, dates etc which now needs to be augmented basis the number of port-in's & port-out's. The communication occurs through a standard SOAP messaging interface which now needs to be upgraded to a version through which we can send/receive data packets (image/doc/PDF etc). Currently this messaging interface is not equipped to send/receive scanned documents. Therefore, for transmitting such documents, an appropriate messaging solution (e.g. FTP/MTOM/SOAP with attachment) would need to be agreed upon between Mobile operators and MNPSs.

From the mobile operator's perspective, apart from the up-gradation of the connectivity and setting up of a suitable interface/ messaging solution & hardware augmentation, this would also entail changes in multiple internal applications – CRM, Billing systems/ software, NPG & EAI (Enterprise Application Interface).

The Authority may kindly recall that during the consultation process for implementing the MNP (for the very first time) a similar proposal (to enable transfer of scanned documents) was considered and debated for transmitting of 'CAF, POA, POI' documents (for subscriber verification) and transmitting the 'Final Outstanding bills' (in case of Postpaid customers having ported out and not paying their final bill). However, it was determined that the proposal was not feasible and therefore shelved at that time. Thereafter, instead of exchange of documents, for ascertaining the subscriber genuinity, the Authority had proposed the implementation of UPC mechanism. We strongly believe that the earlier reasoning for opting for a basic connectivity still holds good.

We also wish to highlight the other aspect of operational challenge in case the above proposal is to be implemented. Currently, at the time of receipt of port out request, the acceptance or rejection of each request is completely automated. The CRM has all the relevant details of the customer (including details about the contract, ownership change, court case/ legal issues etc.). Based on the relevant flags in the CRM against each MSISDN, the Port out requests are suitably actioned in an automated manner. Separately, on a periodic basis, we run manual scripts (off-line process and not linked to the porting process) against our entire subscriber base to enable or disable flags (in the CRM) as the case may be in case of any changed circumstances.

Over-all, the complexity that would need to be overcome and the investments that would need to be made for the proposal contained in the draft amendment (regarding transmission of scanned Authorization letter through MNPS) does not justify the benefits that would be gained by this.

We reiterate that since the Authorized Signatory is different from the user hence the possibility of forging and fraud increases. This implies physical validation/verification of the porting request received through the mobile number of the corporate user by DO increasing the timelines for validation of the porting request. Keeping in mind both the aspects of sensitivity of the corporate accounts and of easing out the porting process, we would further like to suggest that for bulk port out of such connections a single UPC may be generated from a single corporate.

Lastly, in case, the Authority mandates the proposed amendment then in that case we need to enhance the existing hardware in relevant systems (gateway & downstream) to accommodate scanned copy being sent/received. This ideally will consume approximately 3 months with stringent timelines of deployment.