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FEDERATION OF CONSUMER AND SERVICE ORGANIZATIONS

Promoted exclusively to deal with the pressing issues..

(Regd. No.CAG/01/2016 as a Consumer advocacy group with TRAI)

No.5, 4th Street, Lakshmipuram,
Tiruchirappalli – 620 010. T.N. State .

The Chairman,
Telecom Regulatory Authority of India,
New Delhi – 110 011.

12th, April, 2018

Kind Attn. to: Shri Syed Tausif Abbas,
Advisor (NSL – II)

Dear Sir,

Sub: Submit our view in Consultation Paper in Mobile Number Portability Process – reg:

We most respectfully submit the following as our views in the above subject for your kind consideration:

Q1. Would it be appropriate that MNPSF be assigned the task of generating and communicating the Unique Porting Code (UPC) to the subscriber intending to port his mobile number as proposed in the consultation paper?

Yes..

Q2. If you agree to assign the task of UPC generation to MNPSFs, whether the revised process outlined in the consultation paper is appropriate to address the relevant issues being faced in the existing MNP process?

Yes..

Q3. Do you suggest any other methodology which can address the issues being faced in the existing MNP process? Elaborate your answer.

Ans: Rejection and delaying are the issue; the rejection may review by an independent team such as CAGs to know the reasons for rejection is genuine or not.

Q4. How can KYC information available with DO be verified during the MNP process to avoid fraudulent porting? Please elaborate.

Ans: though aadhar only..

Q5. What are the challenges in implementing the proposed MNP processes / framework on the part of stakeholders' viz. TSP (as DO and RO) and MNPSP? Elaborate your answer.

Ans: To close watch and review the rejection of MNP is main challenges, as mentioned a circle wise committee would review the rejection will immensely help..

Q6. Whether MNPSP should be compensated towards the cost of generation and delivery of UPC to the subscriber through SMS? If yes, what mechanism can be adopted?

Ans: No compensation may allow.. If the TSP provide better service, they could get numbers PORT to them and the Donor Operator could have allowed to get minimum charges of Rs.5.00 or less in generating KYC..

Q7. What would be the appropriate mechanism to reinforce the accountability and role of MNPSP in the proposed scenario?

Ans: They ensure timely KYC number and the Role of RO ensure immediate activation.

Q8. What could be the mandatory obligations on part of the MNPSP?

Ans: Issuing KYC number in time and other part activate within time.

Q9. In the event of large scale disruption or sudden shutdown of network, what could be the appropriate alternative mechanism to ensure delivery of UPC and completion of porting process?

Ans: In such case, their showrooms/ office and outlet would manually undertake through their system.

Q10. (a) Do you agree with the process for transfer of the prepaid balance to the subscriber's account as described in the consultation paper? What changes do you envisage in licensing/ regulatory framework to enable the provision? Please elaborate your answer.

Ans: Proposed transfer of prepaid balance within the Consultation paper is good and consumers interest..

Q11. What should be the regulatory requirements to monitor efficacy of the provision of transferring the unspent pre-paid balance? Please elaborate your answer.

Ans: Random Confirmation with the telecom consumers alone the best option..

Q12. In the proposed scenario of reduced MNP timelines, should the validity of the UPC be reviewed? If yes, what should be the period of validity of UPC? Please elaborate your answer with justification.

Ans: As per our view these are not problem to telecom consumers; if introduce better timings it will most welcome.

Q13. Whether it would be appropriate to review the existing structure of UPC? Please elaborate your answer with justification.

Ans: At present, if porting from one to another; the unspent balance would be lapsed, this can be reviewed the balance would transfer to the R.O. with reduction of minimum charges for generating UPC ..

Q14. If you agree to above, does the proposed structure as discussed above adequately serve the purpose or would you suggest any other mechanism? Please elaborate your answer with justification.

Ans: No comments.

Q15. Should the provision of withdrawal of porting request be done away with in the revised MNP process? Please state your answer with justification.

Ans: Yes the provision of withdrawal of porting request will be allowed, now Donor Operator is having option in convincing their customer after sent Porting request. If the telecom consumer satisfy with their commitment, they will have to continue, in such case the withdrawal provision would help to the telecom consumers.

Q16. What additional changes do you envisage in the MNP regulations? Elaborate your suggestions.

Ans: The new regulation should be subscribers friendly and remove the constrains faced with the past two bitter experiences such as one from Reliance Communication and another from Aircel.

- b. The Reliance Communication argued that as per the existing provision they need not return the unconsumed/ unspent balance to the forting telecom consumers, In bear perusal this may correct; but in this issue the subscribers were forced to go for MNP and not Voluntary.
- c. So, the proposed regulations would ensure the refund of the balance to the RO, The rejections may review by a Forum, this may propose within the new Regulation; the Forum may consist with the CAGs.
- d. Regarding MNP on Post Paid, the Reception Organization may collect the balance and transfer to Donor Organization
- e. Through Aircel we found difficulties in availing KYC number considering huge numbers of Portal request and Donor Organization's network problem. In such case; the regulation would provide suitable clause in mutual bulk transfers with the D.O. and R.O. without difficulties to the telecom consumers.

- f. The present system in accepting Portal may be followed that the R.O. issued sim card based aadhar, in this system the chances are very remote to manipulate

Q17. Due to the difficulty envisaged, should the subscriber be allowed to reconnect his mobile number even after number return process is initiated? If yes, what could be the criteria? Please elaborate suitable method.

Ans: This would telecom consumers own choice..

Q18. Should the MNPSs be allowed to charge for the ancillary services such as number return and bulk database download by TSPs? Please provide your comments with justifications.

Ans: Minimum charges may be allowed.

Q19. Would the new technologies, such as blockchain, be helpful for facilitating faster and transparent MNP process? What can be the possible advantages and challenges? Please elaborate.

Ans: Any new technology within the interest of telecom consumers would most welcome and appreciate.

Thanks and regards.

M. Sekaran./ President.