IDEA/NSL-II/2018-19/17   3 May, 2018

Advisor (NSL-II)

Telecom Regulatory Authority of India,

Mahanagar Doorsanchar Bhawan (Old Minto Road),

New Delhi - 110002

Kind Attn: Shri S.T. Abbas

Subject: Response to Consultation Paper on Review of Mobile Number Portability (MNP) Process issued on April 06, 2018

Dear Sir,

At the outset, we thank the Authority for give us the opportunity to comment on review of Mobile Number Portability (MNP) Process.

Please find attached our comments as Annexure A while making amendments to the MNP Regulations.

Sincerely yours
for **IDEA Cellular Limited**

Vineet Kumar
Vice-President- Corporate Regulatory

Enclosure: A/a

ANNEXURE A

Idea Cellular response to TRAI Consultation paper on Review of Mobile Number Portability (MNP) Process' issued on April 06, 2018

Our Query wise response is as under:

Q1. Would it be appropriate that MNPSP 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?

Idea Submission:

At the outset, it is submitted that the current Licensing Regime envisages direct contact with customers through the medium of Access Service Providers only. We are not clear whether the licensing conditions of MNP service provider allows them to take upon themselves the generation of UPC. We thus submit that any regulatory practice needs to be in alignment to the obligations cast upon the various categories of service providers / authorizations to be able to best serve the interests of telecom service providers, consumers and the Indian Telecom Industry**.**

Further, we would urge the Authority to keep in consideration the following points:

   a. TSPs including Idea Cellular Ltd. have already invested substantial capital in building the network & IT ecosystem to process UPC generation requests and does not see any issues in UPC generation process as of now. Just to state some numbers, Idea Cellular Ltd. has processed 1.67 Mn, 1.50 Mn & 1.52 Mn UPC requests for the month of Jan-18, Feb-18 & Mar-18 respectively.
   b. We have also gauged the average time taken for UPC generation and concluded that UPC is generated in ~7 seconds.
   c. It is submitted that the technical reasons mentioned by TRAI as responsible for the delay in generation/delivery of the UPC in certain cases can also be equally true for the systems of the MNPSPs and hence the same cannot be a justifiable reason to shift the onus of UPC generation from TSP to MNPSP.
   d. Thus we submit that the generation of the UPC should continue to remain with the operators and any aberration for non-generation should be dealt with on case-to-case basis.
   e. Also, TSPs should not be asked to compensate or bear the cost of adopting this process of UPC generation by the MNPSPs. This cost should also not be recovered through the per port transaction charge.

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

Idea Submission:

1. As rightly anticipated, we believe there shall be hindrances in this approach which are:

    a. Handling such voluminous transactions on real-time basis, shall be difficult for MNPSP with the existing infrastructure.

    b. As we all know that no systems are infallible, there are some chances of failures For E.g. If there is no response of query by MNPSP and the UPC is generated (for corporate number), it may not have 'C' prefix, then all those request shall be rejected which is not in the spirit of MNP regulation.

    c. Building real-time query which needs to dip into production database for validation on each UPC generation request will bring significant load on the existing infrastructure of TSPs.

2. We thus suggest that the existing process of UPC generation by Donor Operator should continue as is.

3. Whatever issues have been observed are purely due to operator surrendering their license or suspending their services, otherwise in our experience there have been no major issues in UPC generation.

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

Idea Submission:

We will recommend any of the following options to address the issue:

    a. TRAI should do a joint audit of UPC generation on test or random numbers at periodic intervals (quarterly or month) to bring more transparency in the process of UPC generation.

    OR

    b. While it is difficult to track UPC request date & time and correlate with UPC send date & time, we can try and build report for a day or two every quarter and share the same with Authority to bring transparency in the process of UPC generation.

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

Idea Submission:

Idea Cellular feels that verification of KYC is extremely important and sensitive activity. We have not faced any major issue of fraudulent porting except for the instance of a specific operator in the recent past and thus strongly feel that KYC activity needs to continue the way it is at present.

The reason of generating UPC was to authenticate the number and thereby user and this activity should continue the way it is at present. Even otherwise, the customer KYC is confidential information and no information can be shared with any other operator even as per license conditions.

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.

Idea Submission:

Kindly refer to our response as mentioned under Response 2.

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?

Idea Submission:

As recommended in response 1 (a), (d) and response 2, we don't recommend the proposal of generating UPC through MNPSP. Just to re-iterate operators have already invested and have consistently maintained healthy TAT for UPC generation.

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

&

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

Idea Submission:

It is submitted that the same would not be applicable in light of our response to Q 6.

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?

Idea Submission:

We strongly feel that in case of any large scale disruption or sudden shutdown of network, the best mode of alternate UPC delivery is through operator's Website & IVR. The process of UPC generation through website & IVR should be easy as well as authentic

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.

Idea Submission:

We welcome the Authority's thought and feel that it is a very customer friendly move. However, it is submitted that the process of transfer of balance will be a very extensive exercise and not too productive as many customers do not leave any significant value.

(b) If the above process is not agreeable, please suggest alternate mechanism.

Idea Submission:

We recommend that all customer's wanting to port-out should be communicated their balance during the UPC generation and advised to utilize their balance before submitting port-out request.

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

Idea Submission:

As stated in our response to Q 9 & 10 above, we don't see any reason for development of any new requirement to transfer the unspent pre-paid balance.

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.

Idea Submission:

In light of the points 2.45 & 2.46 in the consultation paper, the UPC validity can surely be reduced. We also recommend that all validations for porting shall be done by Donor operator within 24 hours of receipt of request from MNPSP, so that porting process can be abridged to maximum 48 hours.

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

Idea Submission:

Based on the consultation paper, the reason for change in UPC appears to be requests being generated for non-payment disconnection, which the Authority feels is not as per quantum of postpaid subscriber's movement between two operators i.e. while the number is prepaid, authority believes that some operators are generating non-payment disconnection request. While we don't have any reservation against the proposed UPC nomenclature change, however it may be pertinent to note that UPC generation itself is automated, hence we believe that manipulation is not possible. Once the number has ported out, the donor operator has to send invoice to customers (Postpaid only) and then after approx. 30 days raise the request to DNO (through MNPSP), which donor operator cannot do for Prepaid cases since they will have to create invoices for prepaid customers with outstanding and with current IT ecosystem this level of manipulation may not be possible. At least we as Recipient operator has not faced this concern in the last 1 year.

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.

Idea Submission:

As stated in response 13, we don't see any reason to modify the existing UPC nomenclature.

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

Idea Submission:

No, we feel that the provision of port-withdrawal should continue as is. Idea as recipient operator has successfully withdrawn 219, 231 & 274 porting request in Jan-18, Feb-18 & Mar-18 respectively. While this number may be small, however it clearly states that these customers had made a decision in haste and later wanted to stay with their existing operator which should be honored on principles of customer centricity.

We would additionally state that the current process of requesting for port withdrawal is cumbersome for customers and totally dependent upon the recipient operator. We should empower and extend the option of port-withdrawal to customers directly which is operator agnostic. We recommend that a short code should be assigned where a customer can send the request for port-withdrawal (through pre-defined syntax) and should be verified by MMPSP directly (short code should be hosted at MMPSP zone wise). If the port-withdrawal request is received by customer in 10 - 24 hours, the request should be entertained otherwise processed as is today.

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

Idea Submission:

1. **Number Return**

   a. The process of number return should be automated at all operators mandatorily. While we at Idea Cellular Ltd. return the numbers in large quantum, on the other hand receipt of numbers (at Idea Cellular Ltd) is extremely low from specific operators.
   b. Additionally there shall be governance mechanism, whereby the recipient operator should confirm that all the ported in numbers at their end are active in their network to donor operator through MNPSP at-least monthly. This will eliminate any doubt that the number is not due for return or is due for return.

2. **Non-payment disconnection**

   a. We have seen that while we at Idea Cellular consistently disconnect numbers as per provision of law upon request of Donor operators. We recommend that if recipient

operator does not respond to the MNPSP trigger of non-payment request, MNPSP should treat the number as disconnected and modify the LRN. This will automatically bring transparency in the entire process and operators shall be forced to adhere with the Authority's direction.

3. **Number is Corporate but request for port-in initiated as Individual**

   a. One specific operator is sending their port-in request as Individual for all customers, despite their UPC being generated with 'C' prefix. In such cases both MNPSP have no validation built-in hence weather authorization letter is attached or not is, not validated. Additionally since the request is received as Individual, donor does not have the option to reject the request under "Authorization Letter missing". Despite raising the subject to Authority & the operator such practice has still continued.

   b. We strongly recommend that if some specific operator has found lacunas and malpractices in current framework, it should be notified to the Authority for correction and not utilize that lacuna for their benefits.

4. **Allocation of number series**

   a. Owing to shortage in mobile number series, the licensor has started re-allocating MSISDN Series previously allocated to closed operator(s) and naturally there are some numbers which had ported out of the close operator's network. While we understand that to optimally utilize the resources, number series has to be reallocated however we have following suggestions to reconcile 'Number Portability Database' (NPDB):
      i. MNPSP should be informed that the numbers which were ported to the new operator (from closed operator, while it was operational), should not be considered as ported in subscribers as the series now belong to the same operator. Currently as per our records there are apprx 0.56 Mn such numbers as of March, 2018.

      ii. MNPSP should be informed that numbers which were ported to operators which were closed, should be removed from NPDB. Currently as per our records there are apprx 4.4 Mn such numbers as of March, 2018.

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.

Idea Submission:

We strongly believe and support allowing the customers to reconnect their mobile numbers with the recipient operator. Majority of times, however, customers have dispute on billing with their donor operators or the original range holder no longer provides services, but post disconnection customer has no choice but to pay the amount or face permanent disconnection.
In both the situation envisaged above are critical for the subscribers as TRAI has rightly mentioned in the para 3.11 that mobile number has gained so much importance that losing one's number can have serious personal and financial implications.
Thus, there should be a threshold defined within which reconnection should be allowed, for example the Authority can define that within 0 - 55 days from disconnection date, the number can be reconnected.

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

Idea Submission:

No, as majority of processes are automated and there is no need for any development in the current regime at MNPSP's end. The stated ancillary services such as number return, bulk database download and non-payment disconnection request transit are existing since inception of MNP regime there is no need for any additional charge / compensation.

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.

Idea Submission:

Blockchain technology is latest evolving technology which has potential to transform way of working for many industries. We believe it can be useful in Telecommunication industry for various use cases like MNP management, Fraud management, simplification of billing for roaming subscribers etc.

Use of Blockchain technology by TSPs in MNP Process simplification can resolve below existing issues:

1. Elimination of failure points: In current process, MNPSP controls and governs MNP transactions between TSPs. Hence MNPSP is single point of failure for interactions between TSPs. Block chain technologies make each TSP as equally participating nodes in entire network and uses subscriber data as shared ledger. This will remove failure points in network since every MNP activity (UPC generation/ UPC acceptance/ Validation etc.) can published to everyone by both DO and RO. It will eliminate use of LRNs and storing/publishing/ updating LRNs for each porting number with all operators.
2. Secured data transfer and replication: Since all TSPs will be part of same block chain and data is completely encrypted with complex algorithms, it will help in accurate and safe validation of subscriber KYC detail between DO and RO.
3. Reducing MNP time: Subscriber data validation status from DO can be published in real time to RO and to entire chain which will reduce overall MNP process.
4. Easy audit of MNP transactions: Since all TSPs and TRAI will be part of closely linked network in block chain, it will help in reducing data replication issues, incremental data update issues, thereby overall audit of number porting will be easier.
5. Eliminate third party entities: There is no scope of third party controller/ clearing houses or mediator in block chain technology, hence it will eliminate need of MNPSP/ MCH/ DCH kind of third party entities. It will reduce MNP costs to subscriber as well as overheads of TRAI for managing third party entities.
6. Bulk UPC generations: TRAI will be one of the party in block chain which can take control of UPC generation for exiting operator on his behalf, if operator's system is unable to process bulk requests. Since UPC generation and related information will be published over block chain to all TSPs, it will be easier for quick and secured data replication in bulk.

While the advantages are many in implementing block chain technology, there are few glaring weaknesses as well, which needs to be jointly agreed with all industry stakeholders before taking decision. Few of them are listed below:

1. There are no industry-wide standards available for implementation of block chain technology globally, hence TRAI will have to define standards and operating rules before deciding of implementation. Key decisions to be made on below data sharing aspects:
    a. Amount of subscriber information sharing on block chain with all TSPs. We don't recommend sharing and storing KYC or other demographic details of our subscribers with other operators. So it should be only mobile number and circle codes to be stored for limited visibility.
    b. Formulating rules to avoid data misuse by operator for approaching other operator's subscribers.

2. Since a Block chain retains all historical data, the size of an established Block chain at each node might become unsustainable. IT will be equivalent to storing entire MNPDB with all historical transactions are each operator.

3. Risk of poaching by operators once UPC is generated by subscriber. In the duration of UPC generation to UPC submission to RO, subscriber may get approached by every operator with offers, which will be burdensome to subscriber.

Q20. If there are any other issue(s) relevant to the subject, stakeholders are requested to offer comments along with explanation and justifications.

Idea Submission:

Our comments are on this question is marked in response 16.