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Vilnius

TO:**TELECOM REGULATORY AUTHORITY OF INDIA**

E-mail: fa@traf.gov.in.

COMMENTS ON CONSULTATION PAPER NO. 02/2019 OF TELECOM REGULATORY AUTHORITY OF INDIA "UPDATED CONSULTATION PAPER ON REVIEW OF PER PORT TRANSACTION CHARGE AND OTHER RELATED CHARGES FOR MOBILE NUMBER PORTABILITY" DATED 1ST OF APRIL, 2019

Mediafon Datapro, UAB is the company (www.datapro.lt) established and acting under the laws of Republic of Lithuania (European Union State), wholly owned subsidiary of Mediafon group (www.mediafon.eu), is engaged in the development, provision, implementation and maintenance of high performance databases and processes automation systems and solutions, especially NPCDB, CEIR and other centralized telecommunications resources management solutions for telecommunication market. Our Number Portability Central Reference Database solution NUMLEX has already been successfully implemented in 10 countries around the world: in Georgia (Y2011, Y2016), in Azerbaijan (Y2013), in Moldova (Y2013), in Russia (Y2013), in Senegal (Y2015), in El Salvador (2015), in Lithuania (2015), in Tunisia (Y2016), in Kazakhstan (2016), and in Ivory Coast (2018). The projects in Morocco and Mexico are under implementation and will be finished during Y2019. Currently our NUMLEX NPCDB systems serve auspiciously for a significant amount of subscribers, and for a solid quantity of telecommunication operators around the world.

Taking into account the above mentioned experience of Mediafon Datapro, UAB the prosperous possibilities of our company for its successful business development in the nearest future and also regarding the Telecommunication market of India as essentially important for eminent growth of Mediafon Datapro, UAB we would like kindly to represent our strongly considered, indestructible intentions to participate and submit our useful

share in expected processes (procedures) for issuance (sale) of the license for Mobile Number Portability Service Provision.

Mediafon Datapro, UAB is glad with opportunity to provide answers to the questions of “Updated Consultation Paper on Review of Per Port Transaction Charge and Other Related Charges for Mobile Number Portability” dated 1st of April, 2019 and we do also would take as an honor if our replies to the questions would be publicly posted.

By giving all below stated answers, comments and information we would like also kindly to notify that we would take as an honor to provide You any needed further remarks and observations for all listed details and figures in this document by visiting You (in Your indicated place) at any time convenient for Your (covering our costs of this visit ourselves).

After analysis of information provided in the consultation document, we are presenting our answers and comments to the requested consultation questions:

Q1. Whether the ‘Per Port Transaction Charges’ should continue to be calculated based on the methodology adopted by TRAI during the review done in the past? If not, please suggest methodology and supplement it with the detailed calculations indicating costs of hardware, software and other resources etc.

We suppose, that proposed ‘Per Port Transaction Charges’ calculation methodology and price level reduction from Rs. 19/- to Rs. 4/-, based on ours international Number Portability systems implementation and operation experience, is economically reasonable well balanced and fully covers the all MNPSP Number Portability costs with reasonable profit margin.

Moreover, it should be stated, that the reduction of the ‘Per Port Transaction Charges’ lowers the Number Portability costs for Mobile Operators and create possibilities to provide Number Portability services at lower costs and ensure possibilities to have more freedom for subscribers then changing mobile service provider.

Q2. While calculating ‘Per Port Transaction Charge’, whether the total number of MNP requests received by MNPSP or successfully ported numbers be considered? Please justify your response.

Based on ours international Number Portability systems implementation and operation practice, we consider that the ‘Per Port Transaction Charges’, mentioned in our answer to

Q1, presented above, are applicable only for fully completed number porting process, and covers only successfully completed porting process costs, then number subscriber number is successfully ported from one Mobile Operator to another.

Taking into account that all unsuccessful porting requests must also be processed by MNPSP, and processing of all unsuccessful porting requests requires system and human resources, the costs of them should also be covered. These costs of unsuccessful MNP requests should be covered by separate charge. We suppose that this charge should be less than 'Per Port Transaction Charge', because processing of unsuccessful porting requests requires less system and human resources, due to shorter unsuccessful porting process. We suggest that price for unsuccessful MNP requests received by MNPSP should be approximately on Rs. 0.5/- per one unsuccessful MNP request level.

Q3. Should the charges for 'Per Port Transaction' and 'ancillary services' be determined separately or consolidated charges. Please justify your response along with detailed calculations indicating cost of hardware, software, other resources and overhead etc. in addition to the rationale for adoption of the method suggested by you.

From our point of view, all 'ancillary services' can be divided in two parts:

- 'Ancillary services' which can be treated as separate full cycle processes, such as 'Number Return', 'Subscriber Reconnection', 'Non-payment disconnection'. These services should be charged separately for each 'Number Return', 'Subscriber Reconnection', 'Non-payment Disconnection' transaction by same charge as 'Per Port Transaction', because the processes are similar, they are substantial in quantum and additionally utilise the MNPSP system and at the same time consume substantial system and human resources.
- 'Ancillary services' which are integral part of major Number Portability process such as "Port cancellation", and their costs are included in 'Per Port Transaction' charge, so no additional charge for this service should be required;

It should be considered, that 'Database Download' service is mandatory service for proper Number Portability process functioning and periodical data reconciliation for Mobile Operators. From our point of view this service should be provided free of charge, for database download defined number of times for Mobile Operators connected to MNPSP, and on additional charge for other users and for Mobile Operators after exceeding the defined free database download limit. The ceiling level of the price for Mobile Operators connected to MNPSP should be evaluated on costs and reasonable profit margin basis and

should be defined by TRAI. We suggest that prices for other users should be not regulated and will be determined by commercial agreements between users and MNPSP.

Q4. Whether the Dipping charge, which is presently under forbearance, needs to be reviewed? If yes, suggest the methodology to determine the rate of dipping charge. Support your response with justification.

Generally, dipping service is very important service for successful Number Portability functioning and competition in the country. Despite the fact, that the most operators in India uses their own local copies of MNPSP, and usage of the dipping service is decreasing, the importance of dipping service remains high for competition between Mobile Operators and fast entry to the market of new and small operators. Moreover, it should be considered, that performance and quality requirements for online real-time system are higher than MNPSP system, and requires 24/7 support and high level of availability, at least 99.9 %. We suggest that 'Dipping charge' price level for Mobile Operators connected to MNPSP should be evaluated on costs directly related to dipping service and reasonable profit. The ceiling level of the price should be defined by TRAI. We suggest that prices for other users should be not regulated and will be determined by commercial agreements between users and MNPSP.

Q5. Whether the porting charge payable by the subscriber to the recipient operator should continue to be prescribed as a ceiling charge as per the current practice. If no, please suggest methodology and various consideration for calculating porting charge payable by subscribers.

From our international Number Portability implementation and operation practice, we can state that the there are many different subscribers charging models, but in all cases the maximal porting charge for subscribers are regulated and defined by National Telecommunication Regulation Authorities of the countries. We suggest, that porting charge, payable by the subscriber to the recipient operator, should continue to be prescribed as a ceiling charge as per the current practice. However, recipient operators are free to charge a lesser amount from the subscriber for Mobile Number Portability service.

Q6. Any other relevant issue that you would like to highlight on the MNP related charges?

In general, all MNP services prices for Mobile Operators and subscribers have an objectively based background to be regulated by TRAI and defined according to the principles based on services costs and reasonable profit margin. In any case, the price of MNSPS services according to the business practice of our company is sufficient and well qualified. For this reason, commercial activity in India market is anticipated and forecasted as preferable one.

Additionally, we would like to propose to create possibility for MNPSP to provide additional commercial Number Portability based services to other customers whose prices would not be regulated and determined by commercial agreements.

Finally, we want to highlight that proposed by TRAI price recalculation model reflects Today's market trends and create real opportunities for competition between suppliers during new MNPSP supplier selection process.

Yours faithfully,
General Manager




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