

**Reliance Communications Ltd. (RCOM) Response to Draft Telecommunication
Mobile Number Portability (Seventh Amendment) Regulations, 2017**

Reliance Communications Ltd (RCOM) welcomes the opportunity to comment on the draft amendment on Mobile Number Portability Regulations.

Our comments on the draft Regulations are as below:

I. Verification of Unique Porting Code (UPC) by the Mobile Number Portability Service Providers (MNPSPs):

1. The draft seventh amendment stipulates provision for the MNPSPs to verify the UPC received from the recipient operator with the content of the UPC generated and shared by the donor operator.
2. In this regard, it is submitted that the MNP Systems deployed by the operators have the automated process, as a donor, to verify the content of the UPC received from the recipient operator through the MNPSPs. This process doesn't have any human intervention and working fine since the implementation of the MNP.
3. The existing provisions of the TRAI Regulations mandates the Donor operator to not to share the UPC content with any other entity/person except the subscriber. The operators also inform the subscriber that the UPC sent to them should only be shared with the representative of his respective recipient operator in order to mitigate the fraudulent port out cases.
4. The proposal of TRAI to put one more check of UPC content at the MNPSP implies that the donor operator should share the UPC content with both the MNPSPs. This will increase the chances of the fraudulent port out cases from the MNPSPs end over which donor operator will not have any control. Further, this will add to the constraint of the time period which is already very strict and may lead to delay in the completion of the port out of the number.
5. It is pertinent to mention that the UPC mismatch cases are due to the wrong entry by the subscriber/representative of the recipient operators and not because of the donor operator. Hence, forcing the donor operator to build a mechanism to share the details of UPC with the MNPSPs is unwarranted.
6. The proposed amendment has also laid down the responsibility of intimating the UPC mismatch upon the MNPSPs through the recipient operator. As the subscriber still belongs to the Donor operator, it would be easy for the donor operator to intimate the subscriber about such mismatch. Thus, the existing process where the donor operator checks the UPC content forwarded by the MNPSP (recipient operator), it would be in the interest of the entire MNP value chain that the donor operator should take the responsibility of intimating any mismatch as the subscriber still belongs to the donor and it's his responsibility to serve the subscriber in all possible manner.
7. Therefore, in case of rejection due to UPC mismatch, the donor operator should inform the respective subscriber through SMS so that the subscriber can approach his recipient operator and get the same corrected and re-push the request again in the system. This will not only reduce the extra effort required in the whole system due to the proposed amendment but also ensure that the subscriber gets the information from his current operator (the Donor) and act thereupon.

8. The suggested solution requires at least one month time for the implementation and TRAI should allow the operators the said time period.

In view of the above, we suggest that instead of mandating a check of UPC content by the MNPSs, Donor operator should inform the subscriber directly in case of MNP request rejection due to UPC mismatch.

II. Communication of the details to RO via MCH regarding the Non Payment Dues (NPD) by the Donor operator:

1. We agree with the proposed amendment that the Donor Operator, while raising the NPD request, should inform the details e.g. outstanding amount, date of bills etc. to the recipient operator via MCH. This will make sure that when the recipient operator send notice to the said subscriber along with the requisite information so that the subscriber can make the payment as per the requirement.
2. Further, the proposed amendment requires changes in the gateways of the operators as well as the MNPSs for which a minimum of three months period should be given to the operators and MNPSs for the implementation and testing of the system.

In view of this, we are in line with the proposed amendment of TRAI. TRAI should give three months period to implement the required changes.
