

Comments and suggestions by Upbhokta sanrakshan and kalyan samiti, Kanpur (CAG MEMBER TRAI)
Consultation Paper on Review of Mobile Number Portability (MNP) process

Q.1 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?

ANS-, MNPSP may be entrusted to perform additional queries listed above from (a) to (i) from the database of DO before issuing the UPC to the subscriber. The information obtained corresponding to (a) to (d) above are required to ascertain the nature of connection viz. Postpaid/ prepaid, Corporate or contractual obligations and shall be retained by MNPSP for future reference when The porting request is actually received through RO.

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

ANS- With the UPC received from MNP SP, the subscriber shall submit his request for porting along with CAF and the requisite documents to the RO as per the defined norms of 'Know Your Customer (KYC)'. Upon receipt of porting request from the subscriber, RO shall submit the porting request along with UPC and his KYC identity document like Aadhaar number and forward the same to MNPSP the prescribed format. MNPSP upon receipt of the request shall perform the following tasks from within its own database: (a) Whether UPC matches with the UPC issued (b) Whether UPC is valid

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

ANS-In cases of UPC mismatch or UPC expiry, the MNPSP shall immediately, on real time basis inform RO and the subscriber, who can resubmit the MNP request with correct and valid UPC.

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

ANS-In case of a corporate mobile number, the porting request is not accompanied by authorisation letter from the authorized signatory of the subscriber.

Q.5 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-As per the MNP service licence, the MNP Service Provider is required to design, install and maintain the requisite network consisting of both MCH and NPDB in its designated zone. In the MNP process, the role of MNP Service Provider is that of a facilitator administrator and a referee

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-activities is as below:

(i)Activities of TSPs:

(a)To setup single real-time Query response database

(b)To perform activation/deactivation on 24x7 basis.

(ii)Activities of MNPSP:

(a)Receiving UPC request

(b)Query Response form DO

(c)Generating the UPC

(d)Sending the UPC by SMS

(e)Validating UPC content and validity upon porting request

(f)Processing the porting requests

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

ANS-• Providing the facility of dipping services for operators who do not own their own database and want to take the services of MNP Service Provider in the implementation of All Call Query method.(Presently, It is optional for the TSPS to avail the facility)

Q8.What could be the proposed obligations of MNSPs?

ANS-In the proposed MNP process, UPC will be generated and communicated by the MNPSP of the concerned zone to the subscriber, only after performing certain checks from within its own database and certain queries from the DO's Database.

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-For the following reasons:

(i)Expiry of license

(ii)Spectrum trading

(iii)Expiry of technology specific spectrum assigned in a particular band

(iv)Closure of services of a particular technology

(v)Closure of services partially or completely

(vi) Surrender of access spectrum or license

Q.10 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.

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

ANS-The subregulation(2)(d) of regulation 7 of the Telecommunication Mobile Number Portability Regulations, 2009 provides that:"in the case of a prepaid subscriber, an undertaking by the subscriber to the effect that he understands and agrees that, upon porting of the mobile number, the balance amount of talk time, if any, at the time of porting shall lapse"

Q11 What should be the regulatory requirements to monitor efficacy of the provision of transferring the unspent prepaid balance? Please elaborate.

ANS-The Authority is of the view that since no services are being provided by the service provider to the subscriber who has ported his number hence, the TSP should not have right to retain the unspent balance of prepaid mobile subscribers in its accounted

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 has been detailed in the earlier part of the chapter, in the proposed method of UPC generation by MNPSP, UPC will be generated only after evaluating the eligibility of a subscriber requesting for UPC, with the concerned DO on five grounds of rejection.

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

ANS-Unique Porting Code is a randomly generated alphanumeric 8 characters code which is allocated to the subscriber for the purpose of unique identification for porting process.

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-As per the information available, in India approximately 95% of the mobile subscribers are in prepaid segment

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-Complaints have been received on various occasions that in many cases, the RO does not take any action on such requests even if they are received within the permitted time

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

ANS-In the proposed MNP process, since it is envisaged that the entire MNP process shall be completed in a short time, hence provision of withdrawal of porting request would only add to the total porting time.

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-The both MNPSPs together have returned more than 65.13 million mobile numbers to the original Number range holder (all operator)

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.

ANS-The need for Bulk downloads arise for an existing operator to synchronize their local routing database with that of the MNP database for a specific LSA.

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-However, due to operational inefficiencies at operators'end, bulk files are used for reconciliation purpose on a regular basis to correct their database and maintain their local database up to date with the regular broadcast from the MCHL.

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

ANS-The following are the points-

(a)The number is prepaid or postpaid

(b)KYC is completed

(c)Contractual obligations

(d)Corporate mobile number

(e)Age on Network less than 90 days if no history of the number ported earlier is available with the MNPSP

