

UNITECH WIRELESS (TAMIL NADU) PRIVATE LIMITED

Regd. Office: Basement, 6, Community Centre, Saket, New Delhi –110017

August 4, 2009

The Secretary

Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg
New Delhi 110 002

Kind Attention – Advisor (MN)

**Sub: - M/s Unitech Wireless – Response on TRAI consultation paper on
“Determination of Port Transaction Charge, Dipping Charge and Porting Charge for
Mobile Number Portability”**

Sir,

This has reference to the consultation paper issued by the Authority on 22nd July, 2009 to determination of Port Transaction Charge, Dipping Charge and Porting Charge for Mobile Number Portability and requested all stack holder to furnish their comments

Kindly find attached the response of M/s Unitech Wireless* on above subject matter

This is your information and consideration please

Thanking You,

Yours Faithfully

For M/s Unitech Wireless (Tamil Nadu) Private Limited



(Vikram Chona)
Head – Regulatory

***-NOTE:** The term “Unitech Wireless” as used in this letter means and includes the 8 Unitech group companies which have been granted UAS license by the DoT, namely Unitech Wireless (South) Limited, Unitech Wireless (North) Private Limited, Unitech Wireless (East) Private Limited, Unitech Wireless (West) Private Limited, Unitech Wireless (Tamil Nadu) Private Limited, Unitech Wireless (Delhi) Limited, Unitech Wireless (Mumbai) Private Limited and Unitech Wireless (Kolkata)

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**M/s Unitech Wireless – Response on TRAI consultation paper on
“Determination of Port Transaction Charge, Dipping Charge and
Porting Charge for Mobile Number Portability”**

Q1:- Whether the network elements, cost details and the cost structure considered for estimating the port transaction charges are appropriate? If not, give reasons.

As an upcoming mobile service operator, we do not have any bench mark cost to judge the appropriateness of the rate applied. However Authority can align it with internationally available data on the subject. The bottom line is the consumer interests are base served if the transaction charge is kept to be minimum. Therefore lowest of the figures quoted by any of the two MNO should be accepted for first year of operation

Q2:- Do you agree with the factors affecting the number of porting as discussed above? Please indicate if any additional factors are required to be taken into account.

Yes, In addition, the number of operators in a licensing area will also be one of the factors

Q3:- Whether the projection of the subscriber base and annual rate of porting as explained in the paper for the next 5 years is reasonable? If not, give your estimation of annual porting rate along with the reasons.

The subscriber's projection base needs to be aligned with government projected figures which indicate 1093 million by March, 2014. However, the present churn rate could be a rough guide for number of portings

Q4:-Based on the cost details, what is your estimation of per port transaction charge. Justify your estimation and supplement it with the worksheets.

As mentioned in response to question 1, we do not have any access to the cost particulars, therefore to begin with minimum cost quoted by an MNPO can be fixed for first year of operations, to be reviewed for the second year of operation.

Q5:- What should be the time period for review of per port transaction charge?

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Annually, at least for the first three years

Q6:- What is your estimation about the number of voice/SMS/MMS dipping which may take place in the MNP service provider's Query Response System?

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Q7:- What should be the factors which may be considered for the estimation of the Dipping charge.

In every licensing area there will be similar data bases setup by most of the integrated operators, where dipping facility can be extended. Therefore the operators who do not wish to set-up own data base, may be permitted to dip into any of the databases (of MNPO or of other operator) on commercial terms i.e. let market forces decide. However a cap can be fixed based on internationally available tariff and in consultation with MNPO's, to be reviewed after a year.

Q8 (a) whether the recipient operator should be allowed to charge the porting charge from the porting subscriber?

(b) If yes, should porting charge be equal to or less than or more than the per port transaction charge? Give reasons to justify your view?

(c) If no, give reasons to justify your view.

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Q9 Whether the porting charge, if any, paid by the subscriber to the recipient operator, should be shared with the donor operator? Give reasons to justify your view.

Authority should prescribe only the per port transaction charge and amount of porting charges which RO may charge from customer should be left under forbearance, to be driven by competitive forces.

According to us, except for initial spurt if any, the number of porting-INS and porting-Outs will roughly balance out in the case of every operator; therefore to compensate the Donor Operator (DO) for work done in every porting may not be worth the efforts of calculating the amount of payment for every porting. Furthermore, any compensation to the DO would be reflected in enhanced charges to the customer and would not be customer friendly.

