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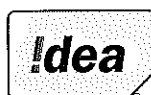
Sub: Idea Cellular's response to the Draft Telecommunication Mobile Number Portability (MNP) (Fourth Amendment) Regulations, 2012

This is with reference to the Authority's invitation for comments on the above-mentioned Draft Amendment to the MNP Regulations, 2012. In this regard, you may note that Idea Cellular endorses the views expressed by COAI on this issue. In addition, we have the following comments:

At the outset, we would like to submit that we are deeply concerned by the TRAI's proposal to implement financial disincentives for failure to comply with the various timelines specified in the MNP Regulation. We say this because it is our belief that in doing so the TRAI fails to appreciate the highly unique and complex environment in which the Indian operators offer services to more than a 900 Million customers, and which also arguably justifies a genuine possibility for any random "errors of omission" or delays emanating from "external dependencies".

Having said that, we have the following additional submissions in support of our belief:

- It is well known that implementing MNP Pan-India was an enormously complex technical and integration exercise, with implementation across 22 service areas, 2 MNPOs and 12-14 operators per LSA.
- Accordingly, the MNP implementation in India has been fraught with several teething issues over the last ~ 18 months most of which have already got resolved.
- Many operators like us who were also winners of 3G license had to simultaneously roll out 3G networks alongside MNP that required careful technical balancing so that the services of the existing customers were not impacted.
- It is also well known now that India which is currently the second largest and the fastest growing telecom market in the World has a network architecture that is unique across the World, because of the various layers involved and the linkages between various systems like the LIM, UCC, IN, etc. This sometimes results in situations where the same changes that need to be replicated across various systems to facilitate an action, like porting, do not get updated due to "acts of omission", resulting in inadvertent delays. However, such outcomes are very rare and as soon as any of them gets discovered by way of the checks and balances in place, corrective action is taken without delay.
- In addition, dependency on external agents like the Channel Partners or the MNPO may also at times interfere in compliance with the specified timelines.



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- We feel that in prescribing financial disincentives for failure to comply with the various timelines specified in the MNP Regulation, the TRAI has therefore failed to appreciate the highly unique and complex network and logistics environment in which the Indian operators offer services to more than a 900 Million customers, that also arguably justifies a genuine possibility for any random “errors of omission” and “bonafide business exigencies” as also delays emanating from “external dependencies”.


In view of the above, we submit that instead of imposing financial disincentives, the TRAI should look at the need to strengthen self-regulation and related compliances thereof. As a first step in that direction, it is recommended that the TRAI may consider the possibility of defining a threshold of 98% only for the prescribed act of an “RO forwarding the porting request to the MNPO within 24 hours of its receipt” and thereafter monitor that against actual performance operator-wise quarter after quarter.

We earnestly believe that the Authority will give due-consideration to our afore-mentioned comments before formalizing any guidelines on the issue.

Thanking You

Yours faithfully,

For IDEA Cellular Limited.



For Rajat Mukarji
Chief Corporate Affairs Officer