

# RELIANCE

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RCL/TRAI/RP/12-13/2781

Date: 14th March, 2013

Shri Sanjeev Banzal,  
Advisor (NSL),  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan,  
Jawaharlal Nehru Marg (Old Minto Road)  
New Delhi- 110002

**Subject:** - Comments on Pre-Consultation Paper on "Full Mobile Number Portability (Pan-India Number Portability)".

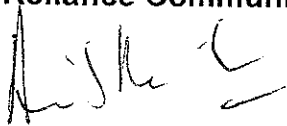
Dear Sir,

M/s Reliance Communications Ltd. (RCOM) welcomes the opportunity extended to comment on Pre-Consultation Paper on "Full Mobile Number Portability (Pan-India Number Portability)".

In this regards, please find enclosed our comments on above mentioned pre-consultation paper.

Thanking you,

With Regards,  
**For Reliance Communications Limited**



**(Authorised Signatory)**

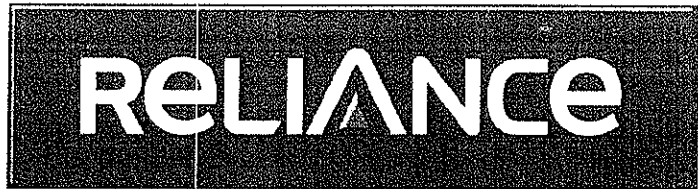
Please Reply to: Sh. Amit Mathur  
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**Copy To:**

1. Dr. Rahul Khullar, Chairman, TRAI
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**Comments on Pre-Consultation Paper**

**On**

**Full Mobile Number Portability  
(Pan-India Number Portability)**

## RELIANCE'S RESPONSE TO PRE-CONSULTATION PAPER ON FULL MOBILE NUMBER PORTABILITY

Reliance Communications Ltd (RCOM) welcomes the opportunity extended by the Authority to comment on issues raised in the pre-consultation paper on Full Mobile Number Portability (Pan-India Number Portability)". RCOM's comments on issues raised in this pre-consultation paper are given below:

1. **Inputs / comments of the stakeholders on the most optimum method for implementing Inter-Service area porting out of the three approaches discussed in this paper are requested.**

### RCOM Response:

- (i) We have analyzed all 3 approaches suggested in the pre-consultation paper. **In our opinion, Approach 1 wherein Recipient Operator forwards the porting request to the MNP service provider of his zone should be adopted and implemented for pan-India Mobile Number Portability.**
- (ii) **Option 1 has advantage over other two options as Access Providers would not have to additionally invest for connectivity with MNP operators.** This option is particularly beneficial for operators who at present are connected with only one MNP operator.
- (iii) The Option 1 has additional benefit over other two options as it does not require any amendment with regard to the scope of MNP license. In case the area of operations of MNP service providers is not extended to Pan India and no amendment is required in the license, the additional complex issues of license fee etc would not required to be addressed.
- (iv) The option 1 has benefit as only limited additional work on part of MNP operators with regard to synchronization of database would be needed.
- (v) In light of the above, we are of the view **option 1 should be implemented.**

2. Inputs may also be provided on amendments required in the existing licence conditions of the MNP service licence, relating to scope of work, entry fee, licence fee, exclusivity period etc.

**RCOM Response:**

- (i) We have suggested preference for Option 1 which does not require any change in the license conditions relating to entry fee, license fee etc.

3. Comments may be provided on issues related to generation of UPC by a roaming subscriber outside his service area, including generation of UPC for the subscriber desiring to/from porting in J&K service area.

**RCOM Response:**

- (i) It would be possible to generate UPC while roaming through SMS or by calling 1900.
- (ii) In line with the NTP'2012 objective of 'Free roaming- One Nation', tariff for calls/SMS to 1900 should not exceed home tariffs.

4. Comments may be provided on mechanism to be adopted for routing of calls if the number has undergone inter-service area porting.

**RCOM Response:**

- (i) MNP query would be required in the calling party switch to find the LRN of the called party mobile number i.e in whose network the subscriber is accessing. Accordingly, on the basis of LRN information, call would be routed to the concerned service provider's network.

**Pre-Call announcement for STD Calls**

- (ii) In case of inter-service area porting, telecom service provider's responsibility is to ensure proper routing of call to its destination in post porting scenarios. It is not technically possible to announce whether call is local or STD to the ported number.
- (iii) Even if some customized solution is developed the same would lead to even more customer complaints and very annoying experience as the calling party will have to bear the same announcement, for each call attempt, to the same

called/ported mobile number. In view of it we suggest that pre-call notification in case, the number is ported out of the circle should not be mandated.

5. **As the present regulations are formulated for porting of mobile numbers within service area, inputs may be provided regarding modifications required in the MNP regulations**

**RCOM Response:**

- (i) In the current MNP scheme the numbers disconnected on negative verification cannot be re-ported. Many incidences have come to our notice when MNP has been carried-out fraudulently. In the current MNP regime, it is not possible to re-port the number to original network. It is therefore suggested that a uniform process to return number to original number holder on the 16<sup>th</sup> day from disconnection date may be considered. MNPO should broadcast the number return on 16<sup>th</sup> day from the date of disconnection.
- (ii) Therefore, keeping a standard protocol we propose to return number on 16<sup>th</sup> day from the date of disconnection in the recipient operator's network.

6. **Minimum Possible testing scenarios covering the various possibilities of porting.**

**RCOM Response:**

- (i) Our efforts in this regard should be to ensure testing scenarios covering all possibilities of porting. For Inter circle porting should be tested at least for the following scenarios:
  - a. Inter circle porting – within same MNP service provider
  - b. Inter circle porting – to other MNP service provider
  - c. The above tests to be repeated for second porting to a third circle.

7. **Comment on any other relevant point related to full number portability may be provided**

**RCOM Response:**

- (i) It is not possible to identify the numbers based on the prefix as to whether they belong to the same circle or another circle.