Preamble

Since, the Government has already decided to implement full Mobile Number Portability and it is well enshrined in the NTP 2012, therefore we are restricting our response only to the business process framework and technical issues involved in implementation of full Mobile Number Portability, as an upgrade to the existing intra – LSA mobile number portability.

The issue wise response to the issues under consideration is as 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.

<u>UNINOR response</u>:

Since all service providers are already connected to both the MNP-SP and maintain the database of both the Zones, we propose that Approach # 3 should be followed.

Full Mobile number portability envisages any one of the following situations

- 1. Porting within the same service area
- 2. Porting to another service area within the same zone 'intra zonal'
- 3. Porting to another service area on the other zone 'inter zonal'

When subscriber desirous of porting his number approaches the Recipient operator, Recipient satisfies himself of the complete CAF formalities before asking the subscriber to obtain UPC from the donor operator and submit the MNP form. The subscriber in home network or roaming network dials 1900 and the SMS is automatically routed to the SMSC of the home network by the normal process in roaming.

Opon receipt of valid UPC, the recipient operator should forward this request to the MNP service provider of his Zone for **intra service area** and **intra zonal** porting requests. The MNP service provider forwards the request to the donor operator within his Zone of operation.

In case of **inter zonal** porting request Recipient Operator should forward the porting request to the MNP service provider of the zone to which number range holder of the number belongs. The MNP service provider forwards the request to the donor operator which lies within his Zone.

The donor operator verifies the porting request w.r.t. established conditions and grounds for rejection permitted under the MNP Regulation and clears / rejects the porting request within the time specified in the Regulation under intimation to the MNP service provider of his Zone. The usual process follows.

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.

UNINOR response:

The scope of license of MNP service provider should be amended to accept **inter service area** porting requests from Recipient Operators across both Zones. Any markup on the entry fee, license fee etc if at all may be left to the Licensor to decide; and in our opinion there should only be markup in the Porting fee separately for the inter service are within the same zone and for inter zonal porting requests.

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.

UNINOR response:

The subscriber in home network or roaming network sends SMS and it is automatically routed to the SMSC of the home network by the normal process in roaming.

Porting Out by out-roamer from J&K:.

Subscriber can generate the UPC at their home network through call for prepaid and SMS for postpaid. To facilitate pre-paid out-roamers of J&K a common mail ID can be created (preferably Nodal Officer of home network) where subscriber can request for UPC.

Porting In by in-roamer to J&K:

It is preferable that the pre-paid subscriber (no issue in post-paid) should send an SMS and generate UPC before travelling to the geographical boundaries of J&K. This simple procedure will eliminate all network / IT changes. In case he fails to generate the UPC and reaches J&K then the customer should send a mail to Nodal Officer of home network and request for UPC. Making any other systemic changes for miniscule customers may not be productive effort.

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

UNINOR response:

Since, the tariff differential between STD and Local is fast diminishing because of IP based networks, and also in view of the huge investment in additional switch capacity to maintain separate LRN/ B-number table. It is advisable that customers should be educated to store the numbers with prefix '+91'. '+91' padding by all operators for terminating calls should be ensured so that it will be a common practice across industry. This will also help in subscriber while storing the contact in correct format.

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.

UNINOR response:

Regulatory changes are required to enable the following:

- Each operator should declare a long code equivalent to the short code 1900.
- Markup in the Porting fee separately for the inter service are within the same zone and for inter zonal porting requests.

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

UNINOR response:

The types of call and SMS based testing should be an extention to TEC 'Instructions on Acceptance Testing of Mobile Number Portability' issue January 2011. The following combination of 3 calls followed by 3 SMS should be done from any 2 preferred partners per LSA. Testing required on PORT OUT/ IN between single circle of different Zone with any two operators. There is no need of performing testing intra circle testing as this has been under use for the last 2 years.

	Originating Network	Terminating Network
Call No 1	Inter service area Ported-IN subscriber	Inter service area Ported-IN subscriber
Call No 2	Inter service area Ported-IN subscriber	Non-Ported number
Call No 3	Non-Ported number	Inter service area Ported-IN subscriber

Safeguards should be taken that the adjoining services should not be chosen for inter service area exchange of SIMs and 2 preferred service providers should be with 2 distinct networks topologies.

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