

MITIS Comments on TRAI draft regulation on Mobile Number Portability (Sixth Amendment) Regulation, 2015

MITIS appreciates the endeavor of the Authority's to ensure Customer interest supreme. Please find enclosed our comments on draft regulation on Mobile Number Portability (Sixth Amendment) Regulation, 2015. Detailed Response is as follow:

Point No 4: Reduction in timelines for Number return process.

We believe that by reducing the timelines for Number return process from 90 day to 60 days, it would encourage the Operators to effectively utilize the Numbers & Number ranges, especially when these resources are limited.

Point No 5: Improving of existing process of handling non-payment disconnections

We believe the proposed solution would increase the dependency on the DONOR while responding to a Nonpayment disconnect (NPD) request. With addition of the proposed message, Subscriber has to chase the DONOR to send the Cancellation message to avoid disconnection.

We recommend that, sufficient time should be given to the subscriber to clear his dues and provide proof to Recipient Operator to avoid any disconnection. The existing time frame of 15 days may be increased to 30 days. This shall provide subscriber to clear all his outstanding dues or any other dispute with the DONOR. With an extended timeout period, we believe that the existing process can serve the purpose already.

Point No 6- Handling of Ownership related issues

We believe handling of Ownership related issues are to be considered in totality as a complete end to end process. We believe a undertaking can be given to the Recipient Operator by the subscriber and can be used in cases where the relevant information provided by the Subscriber is incorrect, and the number is liable to be disconnected.