

From: nchsebpl@gmail.com
To: "Akhilesh Kumar Trivedi" <advmn@traai.gov.in>
Sent: [Wednesday, October 25, 2023 4:02:51 PM](#)
Subject: Draft Telecommunication Mobile Number Portability (Ninth Amendment) Regulations, 2023

Shri Akhilesh Kumar Trivedi
Advisor, (Networks, Spectrum and Licensing)
TRAI, New Delhi

Dear Sir

Kindly find placed below the comments from NCHSE (Reg. No. TRAI/ CAG/11/2013/CA dated [17 April 2023](#) on the subject for consideration in finalising and giving it final shape on MNP Regulation, 2023.

Q1. Whether it would be appropriate to introduce an additional criterion for rejection of the request for allocation of Unique Porting Code (UPC) in respect of any mobile connection, which has undergone the process of SIM swap/ replacement/ upgradation? Kindly provide a detailed response with justification.

Ans. We don't think that any additional criterion except as provided in the letter dated 31/08/023 for rejection of the request for allocation of Unique Porting Code (UPC) is necessary. However, we feel that donor & recipient operators must be held more responsible in verifying and matching the details of mobile owner who seek UPC.

Q2. If your response to the Q1 is in the affirmative, kindly provide detailed inputs on the draft amendment regulations given above.

Ans. No required

Q3. Stakeholders are requested to provide detailed inputs with justification on the DoT's proposal that –

(a) after the generation of UPC code, at an appropriate stage, the demographic details of the subscriber such as Name, Gender, Date of Birth and Photograph, etc., or scanned copy of Customer Application Form (CAF)/ Digital CAF may be transferred from Donor Operator to Recipient Operator. To avoid time delays, such transfers may preferably be done through electronic means; and

(b) the recipient operator should match the demographic details of the subscriber with those details received from Donor Operator. If the subscriber's demographic details match, then only further steps in MNP process may be allowed otherwise, the porting process may be terminated.

Ans. DOT's proposal is quite exhaustive and no need to elaborate further.

A penalty system can be considered both in case of doner/recipient operators, if some wrong thing has happened while matching the demographic details of the subscribers or allotted UPC without proper verification/matching the details of the subscribers.

Q4. Are there any suggestions /comments on any other issues for improving the process of porting of mobile numbers? Please provide a detailed explanation and justification for any such concerns or suggestions.

Ans. The Minimum days of 120 days from the present 90 days can be considered. This may help to delay MNP to some extent. If donor and recipient operators has an update data of subscribers, the problems of fraudulent sim swaps/ replacement etc. may not arise.

Regards,
R.Chandra
Sr. Fellow & CAG member



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