

**Response from MITS Zone 2 on Draft Mobile Number Portability (seventh amendment) Regulations, 2017**

MITS was awarded MNP License in 2009 to build, operate and run MNP Services in Zone 2 covering South and East of India.

We would like to thank TRAI for an opportunity to respond with our inputs to the Draft Telecommunication Mobile Number Portability (Seventh Amendment) Regulations, 2017.

Please find below our response within the context of the draft document issued.

## **1 Regulation 8 and 9 – UPC Validation**

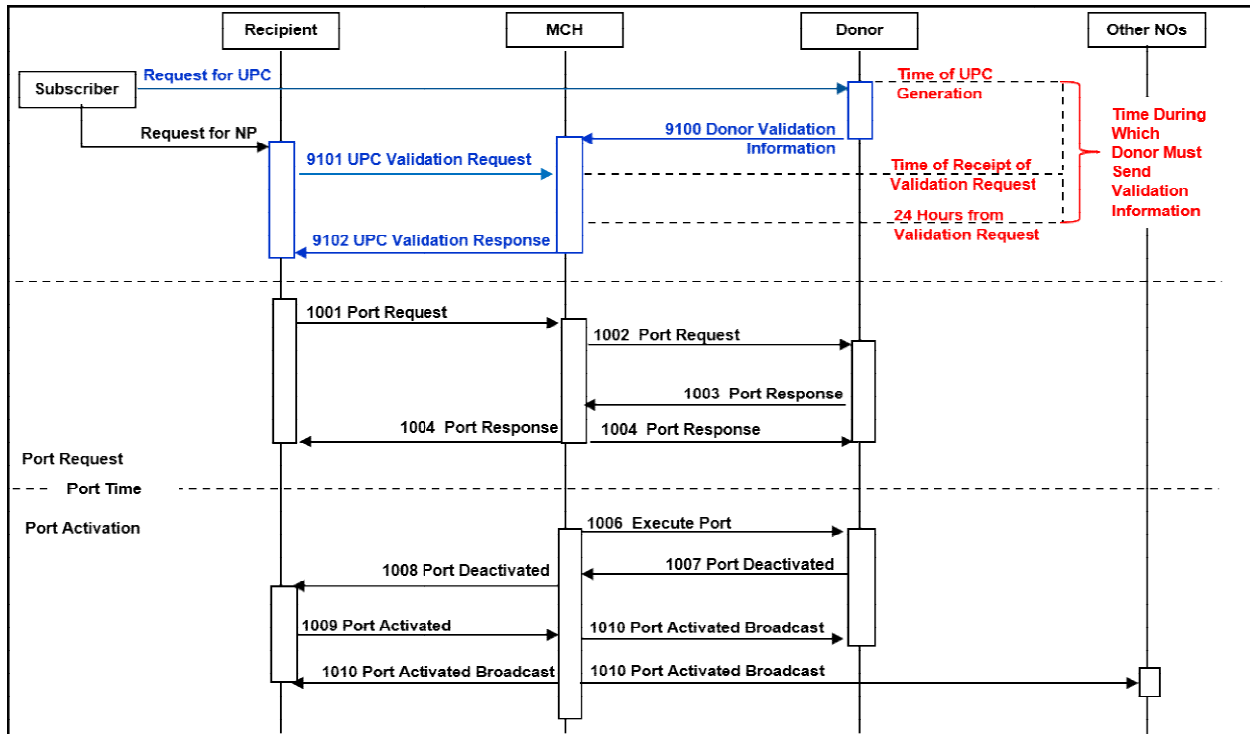
MITS understands the intention of regulation 8 and 9 amendments to reduce the incidence of port rejections caused by invalid or expired UPC by the Donor Operator.

According to the process proposed by the regulation draft, the UPC value and expiration date would be sent to MCH by the DO as soon as the UPC is generated, in a Donor Validation Information message. These UPC details would have to be received from the DO prior to receiving a Validation Request from the RO. MCH would store the UPC information for the mobile number. MCH would perform the validation of the UPC provided by the RO in a new UPC validation request, comparing the value to the UPC value that is sent to MCH by the DO in a Validation Information message.

MCH would compare the UPC values along with the expiration data for the UPC provided by the DO, and would return either acceptance or rejection of the validation to the RO. If the verification is successful, i.e., the UPC codes match and the expiration date of the UPC has not expired, the normal port request process could follow, beginning with a Port Request by the RO. If there is a port request sent by RO without first sending a UPC validation request then MCH will reject the port request.

Upon receipt of the RO Validation Request, MCH would compare the UPC values and consider the expiration data for the UPC provided by the DO, and would return either acceptance or rejection of the validation to the RO.

The proposed Port Request and Activation process is illustrated in the following diagram. The additional messages needed are shown in blue text.



**Figure 1. Proposed Port Request and Activation Process with MCH Validation of UPC**

**Request for clarification in the regulation with respect to UPC Validation:**

The following assumptions are made and MITS seek guidance from TRAI for clarification in the final regulation:

1. In the case where a Validation Request for a particular MSISDN is received prior to the Donor Validation Information message (with UPC information of the particular MSISDN), the UPC Verification Response message to the RO could be delayed up to maximum of 24 hours from the time of receipt of the UPC Verification Request. This would accommodate any delay in the DO's sending the UPC details to MCH. If MCH receives that Validation Information message within 24 hours by the DO, the previously received RO Validation Request would be processed with either an acceptance or rejection based on comparison with the UPC provided by the DO. If the DO Validation Information message is not received within 24 hours of the RO Validation Request, the Validation Request will be rejected after that point.
2. It is assumed that when the Port Request is received, MCH would need to validate that the UPC was already successfully validated for the MSISDN in the port request. If the MSISDN is not successfully validated, MCH would reject the MSISDN with an error. There could be a need for introducing a new error message in the process flow.
3. The MSISDN will be considered port in progress only when MCH receives the Port request and not during the UPC validation phase.
4. Validation Request or Validation Information messages received while a MSISDN has a port in progress will be processed by MCH but a subsequent port request for the same MSISDN that has a port in progress will be rejected per the existing process.

5. Verification messages will be allowed by multiple ROs before there is a Port in progress.
6. It is assumed that any attachments required by the DO for Corporate Ports would be received and forwarded by MCH as done today per existing process flow.
7. In the Port Request flow, MCH will introduce the reject code for a mismatched/expired UPC in the validation request phase and the DO will no longer have a role to play for the UPC rejection/mismatch error to MCH.
8. The issue of how the Validation Request and Validation Information messages flow for Corporate ports must be addressed in the Regulation. MITS suggests that the RO Validation Request should include one message with all of the numbers and the DO Validation Information message should include one message with all of the numbers. If this is not possible, there may be performance impacts to MCH because of the increase in the volume of messages.
9. It is recommended that one UPC is assigned to each number in a corporate port. As an alternative, MITS suggests that an improvement in the process would be to derive and use one UPC from a chosen primary number associated with the corporate port. This will help to reduce the possibility of failure due to incorrect UPCs being entered for one or more of the numbers. MITS has observed this process to be successful in other countries. Other valid reject reasons could still be applied at the number level in a corporate port.

## **2 Regulation 14 – Non Payment Disconnect**

### **2.1 Subscriber Details**

According to the proposed regulation, in order to provide clarity to MCH and RO regarding the amount outstanding in the bill, date of the bill and notice served, if any, by the DO to the subscriber, the DO should send this data to the RO via MCH. This will also ensuring the appropriate timely action on the part of RO.

The DO would send the following details to MCH as part of the NPD request message, and MCH would store these details for future reference and forward them to the RO: the outstanding bill amount, date of the bill and notice served, if any, by the DO to the subscriber.

### **2.2 Payment Due Date, Auto-Terminate, Re-Porting During NPD**

According to existing regulation, the DO can initiate the NPD request to the RO after completion of 30 days of payment due date. MCH is unable to verify this unless the DO sends the payment due date as required information to MCH.

Further, under existing regulation, the Non-Payment Disconnect Time, which is the interval following the sending of the Port Broadcast Activated message during which the DO may request a Non Payment Disconnect, should be based on the Subscriber's Payment Due date. However, since this date is not available to MCH, it is currently necessary for MCH to use the port activated broadcast date in this validation instead.

Clarification is needed in the final regulation to indicate how to handle a case where the allowed response time from the recipient operator overruns the 90 days re-porting limit – calculated from the port broadcast date. According to existing regulations, the DO is required to wait 30 days from payment due date before requesting an NPD. On acceptance of NPD message by MCH from the DO, the RO has 30 days to respond. MCH is also required to allow re-porting of a MSISDN 90 days after broadcast of the last porting, without regard to whether an NPD is in progress. In some scenarios, if an NPD request is raised close to the 90 day re-porting date, it is possible for a subscriber to re-port to another operator 90 days after last porting, but before the NPD is complete.

**With respect to NPD process, MITS requests for inclusions/clarity for the below mentioned points in the final regulation:**

1. **Inclusion of Payment Due Date in the NPD Request message:** The NPD process needs to be implemented using the Payment Due Date. The “Payment Due Date” needs to be a required field in the NPD request message from the DO. MCH will use this date and it is suggested that acceptance/rejection of the NPD request from DO will happen only after the below validation is done by the MCH  

If the difference between the creation date of NPD request and payment due date (in the NPD message) is more than 30 days: MCH will accept the NPD request and if the difference is less than 30 days, the NPD request will be rejected.
2. **Payment Due Date Validation in Relation to Broadcast Date:** Since much of the MCH processing of NPD requests is based on Broadcast Date, the Payment Due Date should be validated in relation to the Broadcast Date for continuity of processing. The regulation should specify whether the Payment Due Date can be before or after the Broadcast Date and by how many days.
3. **Auto-Termination of NPD request:** An inclusion in the current regulation is needed in order to mandate MCH as to when to automatically terminate a NPD Request. Currently the NPD response time for the RO is set to 30 days. Today, if the RO does not respond to the NPD request within 30 days from NPD creation date, MCH logs a violation and continues to keep the NPD request open indefinitely. MCH should be allowed to terminate such an NPD request on the 31<sup>st</sup> day (whether or not the request is completed). This specifically means that no NPD request should be kept open in MCH for more than 30 days
4. **Rejection of re-porting of an MSISDN for which NPD is in progress:** As part of proposed change in the regulation, it is needed to clarify whether a subscriber should be able to re-port in the middle of an open NPD request. In the case where an NPD request is ongoing and remains open beyond the 90 day re-porting period from the Broadcast date for a particular MSISDN, MCH should be allowed to reject a re-port request until the NPD is either completed or terminated. This may require a new reject message to be introduced in MCH and Operators gateway. If the re porting of MSISDN with an ongoing NPD request is rejected, the existing regulation to allow re-porting right after 90 days of port broadcast will not be met. MITS requests for a direction from TRAI on how to handle such cases.

**The following scenarios illustrate the reason that a regulation change is being requested.**

**Scenario 1: normal scenario**

- Port Request Date = 1 August
- Bill Date = 2 August
- Broadcast Date = 8 August
- Payment Due Date = 23 August

NPD request can be raised by DO (From 30<sup>th</sup> day of Payment Due Date)

- Start Date : 23 September
- End Date : 21 October

NPD response from RO (Allowed for 30 days from NPD request creation date)

- Earliest Date of closure for NPD: 22<sup>nd</sup> October (75 days from broadcast date, which is within the 90 day re-reporting period)
- Maximum Date of closure for NPD: 20<sup>th</sup> November (104 days from broadcast date, which is outside of the 90 day re-reporting period)

If the NPD is raised by DO on 21<sup>st</sup> Oct ( last permissible day), the 90 day re reporting period will expire and NPD request will continue till 104<sup>th</sup> day from the BR date. MCH in this case should not allow any re reporting until 104<sup>th</sup> day considering the extreme cases. In case no response is received from the RO until 104<sup>th</sup> day, the NPD request should be terminated and re reporting can be allowed as normal

**Scenario 2: Worst case scenario**

- Port Request Date = 1<sup>st</sup> August
- Bill Date = 31 August
- Broadcast Date = 8 August
- Payment Due Date = 22 September

An NPD request can be raised by the DO (From 30<sup>th</sup> day of Payment Due Date)

- Start Date : 22<sup>nd</sup> October
- End Date : 21<sup>st</sup> November

The NPD response from the RO (Allowed for 30 days from NPD request creation date)

- Earliest Date of closure for NPD : 21<sup>st</sup> November (105 days from broadcast date, which is outside of the 90 day report period)
- Maximum Date of closure for NPD : 20<sup>th</sup> December (134 days from broadcast date, which is again outside 90 re reporting day period)

If the NPD is raised by the DO on 21<sup>st</sup> Nov or 20<sup>th</sup> Dec (earliest and last permissible day), the 90 day re-reporting period will expire in either case and the NPD request will continue beyond the 90

day period from the Broadcast date. MCH in this case should not allow any re porting until 105<sup>th</sup> or 134<sup>th</sup> day from the Broadcast date considering the extreme cases.