LM/TRAI– 03
September 3, 2012

Mr. Sanjeev Banzal
Advisor (NSL-II)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi - 110 002

Sub: Response on Draft Telecommunication Mobile Number Portability
      (Fourth Amendment) Regulations, 2012.

Dear Sir,

At the outset, we would like to draw your attention to the fact that implementations of Mobile Number Portability (MNP) in India was a very herculean task/exercise and that too with implementation of the same across 22 service areas, 180 networks and with two Mobile Network Service Providers (MNPOs).

We would also like to highlight the fact that MNP itself was a new concept for india, keeping in view India's complex and large network architecture where Telecom subscribers has crossed more than **929.37 million**, it needs more time to get the things implemented on real grounds in efficient and effective manner. Since MNP was launched in January'11, we are continuously striving very hard day by day to make the process more reluctant and smooth.

TRAI vide its Draft Regulation has proposed to put the financial disincentive on the operators for not adhering to the timelines on various counts prescribed in the MNP Regulations.

In this connection, please find our submission as under:-
- We would like to highlight the fact that implementation of Mobile Number Portability is very complex exercise; several complex and technical issues are involved.
- The process of MNP is not a single operator dependent process and needs coordination between 2 operators and 1 MNPO for each single port-out. There is a dependence on the MNPO and other operator for various technical and process related issues.
- You would acknowledge the fact that porting systems are designed with certain limitations and at times due to various factors this porting process might get delayed. Also varies with the frequency of the porting request received, many times it exceeds system capacity.

- There is dependence on MNPOs for various technical & process related issues. It has been observed that while operator's porting systems have been designed to meet the one hour window, there are various external factors due to which there may be delay in the clearance of porting requests, as frequency of porting requests received varies from time to time. On many occasions the number of requests exceeds the system capacity thereby causing delays.

- Further, the MNPSPs tend to push most of the porting requests within the first few hours of the total daily transaction timeframe thereby choking the system capacities while for the rest of the period there are very few requests.

- Another reason is the complexity of MNP systems and its dependency on various internal network & IT systems such as HLR, IN, etc. Owing to the continuous updation in technical systems to improve performance or due to network latency issues, etc., occasionally downtime of such systems is taken, which results in delay in activation in that time period.

- Therefore, based on the practical experience; we recommend that the benchmark for both disconnection and activation should be minimum of 2 hours, for 95% of the Porting cases excluding network downtime/latency related issues". Since, the porting activity is scheduled during the night; customers will not face any difficulties despite the porting timelines increasing to 4 hours (2 hours for disconnection and another 2 hours for activation).

In view of the above, we strongly recommend as below:

- TRAI to adhere an approach similar to QoS, wherein the thresholds are defined and operator's performance are monitored against the same.

- Quarterly QoS trends for each operator in this respect should be analysed by TRAI.

- Justification & explanation should be sought from operators who are not meeting the Thresholds/Benchmark.

- In case the operator fails to meet the thresholds for two consecutive quarters and the justification/explanation provided by the operator for the same is inadequate, suitable action may be considered by the Authority against that operator.

- The above suggested approach would encourage operators to comply with the timelines prescribed by the TRAI but will also give them cushion against the un-avoidable external factors causing delay in the processes.

We request the Authority to review this sub-regulation and put in place an achievable benchmark & accordingly the chances of fulfilling the time commitment to the subscribers will increase.

This is for your information & kind consideration, please.

Thanking you,

Yours truly,

for **Loop Mobile (India) Limited**

Harish Kapoor
Authorized Signatory
M:9711466789