

Orange Mobile's comments on the draft "*instructions for Implementing Mobile Number Portability in Jordan*"

Orange Mobile would like to thank TRC and express its appreciation for providing the opportunity to share our feedback and comments on the draft "*Instructions for Implementing Mobile Number Portability in Jordan*" published by TRC on 26-Mar-2025 , and is kindly asking TRC to take the comments and suggestions below into consideration.

General Comments

1. These instructions lack many fundamental elements that should be clearly addressed, detailed, and agreed upon before any implementation begins. This observation is based on our experience with the 2005 instructions, which were accompanied by additional documents—such as Industry Forum Terms of Reference of 2005, and the Statement on MNP Implementation that was issued in 2009—that provided further clarification and were considered integral parts of the overall regulatory framework.

These supporting documents were read with the instructions and served as essential parts. In contrast, the recent instructions issued by TRC are missing these important documents, both within the text itself and in any accompanying documents. Previously, TRC planned to issue the RFP based on such comprehensive regulatory framework. In fact, these documents formed the basis for launching the RFP, which means that the RFP was dependent on these documents. Therefore, issuing an RFP or any other subsequent document without first agreeing on all such details—whether within the instructions or through supporting documents—will not sound from regulatory, legal, or technical point of view.

Moreover, the new instructions lack a dedicated section for the Industry Forum, which should clarify its role, responsibilities, scope of work and expected outcomes. This framework must be defined either within the instructions or in a supplemental document that is intended to be read as an integral part of the regulatory framework.

2. In regard to the cost, Orange Mobile has many concerns including:

- The financial and technical costs fall unfairly on operators. Operators shall agree on a cost-sharing mechanisms with the NPC provider for the operation considering the benefits for each operator as well as network differences. Orange Mobile recommends to clearly define the cost-sharing methodology, and detailed process for dispute resolution, considering potential benefits and network differences between operators and before starting the implementation of this project.
- The requirement for operators to jointly bear the cost of the MNPC setup and operations, in addition other internal implementation costs which value is uncertain yet, would cause a significant financial burden.
- According to the instructions, MNP should be free of charge for customers. This would hinder the operators' ability to upgrade systems and discourage innovation due to operators' inability to retrieve part of their incurred costs.
- Fixed Operators shall not bear any cost related to MNP, or any additional cost related to conveying calls to ported numbers. Recipient operator shall bear any cost of other licensees (Not mobile licensees).

3. The proposed timeline for project execution of 12-month deadline for full implementation and 2-months for submitting a detailed plan is unrealistic when compared with the international benchmark that was presented by TRC's consultant earlier, and when considering the technical, contractual, and operational changes required. On the other hand, TRC should also take into consideration the projects Orange is now executing (Core and Billing) that are

affecting MNP call flow and need two to three years to complete before implementing MNP to avoid duplicated investment.

4. The document does not outline safeguards to ensure customers' data confidentiality. TRC should - through the instructions, mandate strict requirements for data protection, especially for customer-sensitive information.
5. The draft instructions state that all final decisions are taken solely by TRC, this could lead to decisions that may not reflect operators' consent, circumstances, agreements, or operational realities. Orange ensures the need to follow and activate the voting mechanism of the MNPWG through the instructions, as sometimes there may be contradiction between MNPWG recommendations and TRC decision.
6. It is unclear if these instructions affect the previously issued MNP Business Rules by TRC. Those rules were expected to be developed and agreed upon after the issuance of these instructions, to align with the obligations and provisions of the new instructions.
7. There are no clear regulatory provisions that govern the role of fixed telecommunications operators or protect their interests. This concerns considering the fundamental role these operators play in the success of this project, and the significant differences in the nature of fixed network infrastructures.
8. The document assumes full technical readiness for automation but does not account for legacy systems or cases where manual intervention is required.
9. Orange believes that TRC should clarify the details of the authorization intended to be granted for the MNP clearinghouse, since the clearinghouse operation must be based on sound legal basis, Orange suggests that due to

the criticality of the clearinghouse function, it should be addressed under a proper license class newly created in the licensing regime. Otherwise, the clearing house should be maintained and managed by a committee issued by law and by representatives for all operators and the TRC, number of representatives for each operator should have a clear way to be decided.

10. Legacy networks (Fixed network as an example) that are unable to interrogate MNP database by the conventional protocols (MAP or INAP), accordingly a hybrid solution between Direct Routing (All Call Query) and Indirect Routing (onward routing) could be needed and this would be really needed. In Indirect Routing, the Donor Operator has the responsibility to determine whether the called party is a ported number and route the call to its subscription network.
11. The standard MNP process is built around individual consumers only, it is understood that bulk porting shall not be included due to the fact that services provided for such accounts do not constitute only of standard mobile (voice + data), but also include other services, like but not limited to; data lines, fiber, M2M, VAS, handset subsidy, free services...etc., which was taken into consideration to form the cost structure of the offer given to those account, and accordingly makes porting only the standard mobile part of the group services offered not possible technically and commercially. Adding on this that such services are provided over commitment period and possibly with infrastructure investment done by Orange Mobile specially to serve those accounts.

12. No dispute resolution framework, the Instructions do not mention how inter-operator disputes will be handled outside of TRC enforcement. Accordingly, Orange Mobile suggests adding new section “Article (xx) Disputes to be resolved by MNPWG mediation first, then TRC.”.
13. The draft instructions state in multiple clauses that TRC will approve MNPWG decisions. Orange believes that such references shall be removed provided that TRC is part of the MNPWG and that MNPWG decisions are made using a voting mechanism between the operators but excluding TRC.
14. Orange Mobile believes that to add an article to cover the need of integrating MNP system with the security authorities’ systems, due to the need of having these systems integrated within the porting process to ensure the continuity of their active role to be unaffected during or after porting process. Additionally, the implementation plan should cater for changes and updates may need to be done on security authorities’ systems to integrate with MNP systems.
15. Orange believes that the instructions shall be clear on the procurement process of the MNPC indicating that the operators shall run the RFP and decide on the winning bidder since they are the contracting party.

Specific Comments on Articles:

Article Number	Article/ Original text	Orange Mobile Comment
1 (a)	Mobile Number Portability (MNP): the ability of mobile customers to retain their mobile numbers when changing the mobile network operator.	In order to be able to apply the “Break Before Make” principle, the definition should consider the switching time, accordingly, Orange suggests rephrasing the definition “The ability of mobile customer to retain their mobile number when switching from one mobile network operator to another”
1 (c)	Mobile Number Portability Clearinghouse (MNPC) – the entity engaged by the Operators which is authorized by the TRC to operate and manage the mobile number portability administration service, and centralized database that manage the delivery of number portability services in Jordan.	<p>Orange believes that the type of engagement and legal setup between the operators and the MNPC should be clearly identified because it has implications on many aspects including but not limited to:</p> <ul style="list-style-type: none">1- Cost sharing.2- Cost allocation during the project (upfront/ post-launch/ etc)3- Obligations and liabilities. <p>Moreover, the wording is not accurate, it might mean that the operators have the flexibility to engage any entity, although we assume that there will be only one authorized entity.</p>

1 (e)	Additional Conveyance Costs - are the specific extra costs incurred by an operator to convey traffic to ported numbers compared to conveying traffic to non-ported numbers, including but not limited to transit (signaling) and the database look up costs.	Orange would like TRC to elaborate more on the look-up cost, as it's not defined.
1 (f)	Mobile Number Portability Administration Rules (MNP Business Rules) – the document that defines the rules and conditions that apply in terms of ranking and provision of the number portability process for mobile postpaid and prepaid subscribers in Jordan.	Orange would like TRC to elaborate more on what is meant by ranking of the number portability process. However, to improve the clarity and ongoing responsibilities, Orange suggests rephrasing the definition as follows: The document that sets out the operational procedural rules for implementation, management and governance of the MNP process for postpaid and prepaid subscribers in Jordan that is subject to update from time to time based on operators' agreement.
1 (g)	Mobile Number Portability Working Group/ Steering Group (MNPWG/SG)- means the groups of managements and experts in relevant fields that represent the operators, subject to mobile number portability, to collaborate to progress the timely development, implementation and launch of the Jordan Mobile Number Portability Service. This group is led and supervised by the TRC .	Please refer to our general comments point #5. Besides, Orange would like TRC to warrantee that the working groups should not be influenced by any party including TRC.

1 (h)	License means License Agreement and all Schedules attached thereto, as amended or modified in accordance with the terms thereof.	Orange suggests aligning it with the definitions as mentioned in the Telecom Law and the License agreement
1 (i)	Licensee means a person who has acquired a License in accordance with the provisions of the Law.	Orange suggests aligning it with the definitions as mentioned in the Telecom Law and the License agreement
1 (k))	Recipient Operator - is the operator who will be communications service to the subscriber after porting.	In order to reflect the complete process Orange suggests rephrasing this definition as follows: The operator that will provide communication services to the subscriber after the successful completion of the number portability process.
1 (l)	Customer - means any Person who has entered into a contract with the Licensee for the provision of mobile telecom services.	Orange suggests rephrasing this definition as follows: Means any Person who has entered into a contract with the Licensee for the provision of mobile voice telecom services.
2 (a)	Mobile Number Portability shall be Recipient Led requiring the recipient operator to manage the porting transaction on behalf of the mobile customer.	We suggest rephrasing it as follows to be in line with the definitions. Mobile Number Portability shall be recipient led requiring the recipient operator to manage the porting transaction on behalf of the mobile customer.

2 (b)	Customer porting request will be completed within 24 hours after the request is initiated by the recipient operator.	<p>Completing the porting process within 24 hours is challenging, especially if validation, technical, financial or any other issues arise, and there should be flexibility as was mentioned in our previous response on the business rule. Moreover, 24 working hours (to exclude weekends and national holidays) for single number porting.</p> <p>In addition, porting time is challenging when considering LEA needs to do updates on their own systems after the Break on Doner Operator and before the make on Recipient Operator . So, this to be assessed based on end-to-end communication between MNP and LNPs including LEA (asynchronous communication mode with LEA – LEA needs to acknowledge back before sending Porting Activation Request to the Recipient Operator).</p> <p>Limited time frame may result in errors, unauthorized ports, or service degradation.</p>
2 (c)	Customer requesting to use the Mobile Number Portability Service will be required to either visit the retail store or meet the designated sales agent of the recipient operator or any other available	We suggest rephrasing the clause to become as follows: Customer requesting to use the Mobile Number Portability Service will be required to be identified,

	channel approved by the TRC to initiate their porting request.	<p>verified, and documented by the recipient operator according to existing processes.</p> <p>On the other hand, this proposed model does not align with how Business-to-Business customers operate:</p> <ul style="list-style-type: none"> • Corporate decisions are not made at retail level — they go through procurement/legal/IT. • Field agents may not have the authority or documentation to act on behalf of a business account. • Security risks if porting is triggered by someone without real authorization. <p>Accordingly, Orange shall be able to follow any internal process that is admitted by an operator to facilitate the MNP process especially for corporate accounts. Also, Orange suggests to clearly state official digital channels as one of the options.</p>
2 (d)	The Mobile Number Portability Service in Jordan will require the customer to validate the ownership of the number (s) to be ported and confirmation to progress with the porting transaction by sending a free of charge SMS to the MNPC.	<p>High risk of unauthorized or fraudulent porting. Additional safeguards may be needed other than the free SMS confirmation to ensure customer identity verification such as OTP.</p> <p>On the other hand, the current proposed clause assumes the actual SIM user is the decision-maker.</p>

		<p>While this may not be the case, especially for Business-to-Business customer, for example:</p> <ul style="list-style-type: none">• SIMs are often assigned to employees, not decision-makers.• Many IoT/M2M SIMs have no user interface to receive or send SMS.• Risk of unauthorized ports or inability to complete validation. <p>A central validation process via authorized business contact (email, portal, digital signature) is required.</p> <p>Orange suggests rephrasing it as follows:</p> <p>The Mobile Number Portability Service in Jordan will require the customer to validate the ownership of the number (s) to be ported and confirmation to progress with the porting transaction by appropriate means as decided by the operator.</p>
--	--	---

3 (a)	The TRC will work with the related operators through working and steering groups (MNPWG/SG) to determine the appropriate technological and operational solutions to implement Mobile Number Portability.	Orange suggests rephrasing it as follows: The TRC will work with the related operators through working and steering groups (MNPWG/SG) to facilitate determining the appropriate technological and operational solutions to implement Mobile Number Portability.
3 (b)	The TRC will oversee the deployment of mobile portability by establishing reasonable deadlines for implementation.	We suggest rephrasing this article as follows: Operators should develop mobile portability by setting practical, achievable, and reasonable deadlines for implementation that align with the international practices, taking into consideration the circumstances of each operator.
3 (c)	The TRC will continue to maintain oversight over any procedural or technical issues and disputes that may arise.	We suggest rephrasing this clause as follows: The TRC will continue to oversee in good faith any procedural or technical issues and disputes as they are reported or filed.
3 (d)	Each mobile operator shall ensure its own network readiness for implementing Mobile Number Portability.	This clause should not be under the section “Rules and Involvement of the TRC”. However, and without prejudice to this position, and as each operator is familiar with its network and its own projects that may affect the MNP implementation and projects that must be completed before commencing the MNP Orange suggests rephrasing this clause as follows:

		Each mobile operator shall confirm its own network expected date of readiness and its readiness for implementing Mobile Number Portability.
4	Article (4) Mobile Number Portability Working Group/ Steering Group MNPWG/SG:	<p>The TRC's draft instructions suggest that the MNPWG replaces the Industry Forum. However, according to the 2005 instructions, the role of the Industry Forum was to define and recommend technological and operational solutions prior to the initiation of the MNP project. On the other hand, the MNPWG's role is to implement the technological and operational solutions already determined by the Industry Forum, with the involvement of the operators.</p> <p>Orange believes that the Industry Forum and the MNPWG serve two complementary functions within different phases of the MNP project. The Industry Forum is intended to agree and decide prior to implementation, to facilitate discussion and formulation of recommendations. Subsequently, the MNPWG is established to execute and oversee the implementation of the outcomes determined by the Industry Forum. Accordingly, Orange believes that TRC should extend the MNPWG work scope to take the role of the Industry Forum mentioned above.</p>

		<p>Also, TRC should take into consideration the need to consider different aspects and not only technical, If the group is too technically focused, then commercial impacts may be overlooked:</p> <ul style="list-style-type: none"> • Technical specs. • Testing scenarios. • Policy recommendations.
5 (a)	Mobile number portability service shall be free of charge to customers. Mobile operators will not be permitted to levy charges on customers requesting to port their mobile numbers.	<p>Fixed Operators shall not bear any cost related to MNP, or any additional cost related to conveying calls to ported numbers. Recipient operator shall bear any cost of other licensees (Not mobile licensees).</p> <p>On the other hand, Orange believes that the operator has the right to set porting fee, that its amount is not only limited to cover the cost, but also to make sure customers value the service and are genuine when they decide to go for porting.</p>
5 (b)	All mobile operators shall share in the costs of the MNPC set-up and operation and additional traffic conveyance.	<p>Orange believes that mobile users should share the cost of MNPC setup, operation, and additional traffic (by paying the porting fee) conveyance as stated in 2005 instructions previously.</p> <p>Also, please refer to our general comments point #2.</p>

5 (d)	New point to be added	Orange demands to add a new clause to this article as follows: 5 (d) Fixed operators shall not bear any cost for MNP implementation or traffic routing.
6	Article (6) Tariff Transparency	Orange believes that tariff confusion is a big risk post-porting, especially for Business-to-Business customers where companies manage hundreds of SIMs. Off-net vs. on-net pricing impacts pooled usage and expense forecasting.
7	Article (7) Mobile Number Portability Clearinghouse (MNPC)	please refer to our general comments point #9.
7	The Mobile Portability Service will be centrally managed by a third party that shall have authorization from the TRC. The MNPWG shall progress the establishment of the number portability clearinghouse in order to facilitate the implementation and operation of Mobile Number Portability and make it more administratively efficient. The Central Number Portability Clearinghouse shall be procured and equally paid for by the mobile operators.	Operators shall agree on a cost-sharing mechanisms with the NPC provider for the operation considering the benefits for each operator rather than being equally paid by the operators as stated in the instructions. Besides, Operators may request performance audits; TRC to act on poor MNPC performance.
8 (a)	All operators are required to implement and operate All Call Query Direct routing for all traffic originated and terminated in Jordan destined for ported and non-porting numbers. All operators shall	Legacy networks (Fixed network as an example) that are unable to interrogate MNP database by the conventional protocols (MAP or INAP), accordingly a hybrid solution between Direct Routing (All Call Query)

	reach an agreement on the technical and architectural solution for Mobile Number Portability implementation.	and Indirect Routing (onward routing) could be needed and this would be really needed. In Indirect Routing, the Donor Operator has the responsibility to determine whether the called party is a ported number and route the call to its subscription network.
8 (b)	Mobile operators are required to implement and operate automated porting processes interworking the operator's business systems with the MNPC to automatically process the defined validation, deactivation and activation activities once the initial porting request is submitted to the central number portability clearinghouse by the recipient operator	Please refer to our general comments point #8.
9 (a)	The MNPWG shall serve an active role in determining the technical solution to be implemented. The MNPWG shall make recommendations to the TRC regarding key functions and activities related to the mobile number portability service and the corresponding implementation and launch of the service. The TRC will consider and approve recommendations received from the MNPWG but only the TRC will be the final decision-making authority.	<p>Please refer to our comment on article 4. In addition, Orange suggests rephrasing this clause as follows to be in line with comment no. 5 of the general comments above:</p> <p>The MNPWG shall serve an active role in determining the technical solution to be implemented. The MNPWG shall make recommendations to the TRC regarding key functions and activities related to the mobile number portability service and the corresponding implementation and launch of the service. The TRC will oversee the recommendations received from the MNPWG after voting.</p>

9 (b)	Any mobile operator that commits a fraudulent port shall bear all the costs for reversing the port and shall be subject to penalties in accordance with the license agreement and TRC Regulations.	<p>Orange suggests rephrasing this article as follows to ensure fairness:</p> <p>Any mobile operator that intentionally commits a fraudulent port shall bear all the costs for reversing the port and shall be subject to penalties in accordance with the license agreement and TRC Regulations if such actions are proven to be intentionally fraudulent by the concerned authority.</p> <p>In addition, there should be a clear definition for “Fraud”.</p>
9 (c)	The mobile operators shall institute “barrier free” porting procedures and shall not refuse a valid porting request except under specified circumstances as agreed and established by the MNPWG and approved by the TRC.	<p>Please refer to our general comments point #13.</p> <p>In addition, conditions under which a porting request may be rejected are not detailed. This could result in confusion and disputes between concerned parties. “Valid Porting” definition should be clearly identified.</p> <p>Furthermore, Barrier free is risky for Business-to-Business if not carefully scoped. There must be valid rejection reasons, and published in the MNP Business Rules such as:</p> <ul style="list-style-type: none"> • Active managed service contract. • Ongoing payment dispute. • Number tied to critical infrastructure (e.g., ATMs, smart meters).

		<ul style="list-style-type: none"> • Non-matching identification, • Fraud risk, • Unresolved billing.
9 (d)	The Mobile Number Portability service will be governed by the provisions defined the Mobile Number Portability Business Rules framework document which will be developed by the MNPWG and approved by the TRC. The Mobile Number Portability Business Rules will define the mobile porting process, activities and functions, as well as the responsibilities for all related operators to ensure an efficient and consumer centric porting experience.	<p>Please refer to our general comments point #13.</p> <p>Also, in addition to our comment on the definition of “Business Rules”, Orange believes that the Business Rules must cover:</p> <ul style="list-style-type: none"> • Delegated authority. • Hierarchical account ownership. • Transition timelines for critical services.
10 (a)	The technical, operational approaches and the business rules for the implementation of Mobile Number Portability shall be addressed and studied by the MNPWG and shall be approved by the TRC.	Please refer to our general comments point #13.
10 (b)	The solution shall be fully implemented within (12) months from issuing these Instructions. At least within 2 months from the issuing of these Instructions, the MNPWG is required to file a realistic implementation plan to the TRC for approval, including clearly defined activity milestones which all mobile operators will be required to meet. Any mobile operator that fails to	<p>Please refer to our general comments point #3.</p> <p>In addition, 12 months won’t be sufficient for full Business-to-Business readiness, Enterprise migrations typically take months of planning, approvals, and testing — especially with complex integrations and bundled services.</p>

	comply with the implementation plan or meet one or more agreed activity milestone(s) shall be subject to penalties in accordance with the Telecommunications Law and TRC Regulation.	Furthermore, the penalty for not meeting milestones could be unfair if delays result for reasons that are out of the operator's control.
New Clause		As the Instructions do not include clear liability clauses for service interruption, data inconsistency, or failure to meet deadlines by the MNPC or other operators. Orange suggests adding the following clause: Each party shall be liable for failure to meet obligations and indemnify others from resulting damages.
New Clause		As there are no data protection safeguards, customer data will pass through multiple parties without specific provisions ensuring data security or compliance with data protection principles. Accordingly, Orange suggests adding the following clause: "All parties must comply with data protection laws and ensure data is confidential, secure, and purpose-limited."
New Clause		There is no protection against fraudulent ports; Operators bear the cost of fraudulent ports without safeguards. Orange suggests adding the following clause: Operators shall not be financially liable for ports executed fraudulently due to failure in MNPC or other

		parties' validation systems. A chargeback mechanism shall be introduced for such cases.
New Clause		<p>Donor operator loses control under recipient-led model: Recipient-led porting without donor approval increases risk of abuse. Accordingly, Orange suggests adding the following clause:</p> <p>Donor Operator may verify ownership to prevent fraud prior to deactivation.</p>
New Clause		<p>As there is no MNPC SLA penalties or reporting. Orange suggests adding the following clause:</p> <p>MNPC subject to SLA metrics and penalties; must publish quarterly performance reports.</p>