Umniah would like to thank TRC and express its appreciation for providing the opportunity to share our comments on other operators' comments regarding the draft "Instructions for Implementing Mobile Number Portability in Jordan", and is kindly asking TRC to take our comments and suggestions below into consideration.

Umniah Comments on Orange Mobile's comments

<u>**General Comments**</u>

We have reviewed Orange Mobile's general comments and believe that many of the points raised have already been addressed within our specific article-by-article responses below.

That said, we would like to take this opportunity to reaffirm Umniah's position on the key principles that should guide the implementation of Mobile Number Portability (MNP) in Jordan, and the critical role of the TRC in upholding them.

TRC's Central Role Is Essential

The TRC, as the independent regulatory authority, must maintain its leadership in:

- Approving and enforcing the MNP Business Rules,

- Ensuring fair and binding operational oversight over all stakeholders, including the MNPC and mobile/fixed operators,

- Resolving disputes efficiently, and

- Keeping the MNP process aligned with international best practices.

The MNP Implementation must remain anchored in the following principles:

- Simplicity and Automation: MNP must rely on a seamless, fully automated process to prevent disputes, reduce errors, and improve customer experience.

- Free and Fair Access: Porting must be free for consumers, in line with international standards, to promote adoption and stimulate competition.

- Efficient and Time-Bound Implementation: The 12-month implementation timeline is both realistic and necessary. Internal projects of individual operators should not delay a national regulatory initiative.

- Transparent and Competitive Market Environment: we expect the regulatory framework to reflect a competitive level playing field where all operators are subject to the same expectations, standards, and timelines.

On the other hand, we would like to highlight that there is no need to reintroduce the "Industry Forum" concept, which was relevant in earlier regulatory contexts when MNP was still an emerging topic. Today, the TRC-led MNPWG/SG provides a well-defined and sufficient structure to manage all technical, commercial, and operational coordination particularly within the specific circumstances of Jordan's telecom market and commercial processes.

Many concerns raised in Orange's general comments are already addressed by well-established international MNP practices and, as such, should not be subject to undue revisiting. Any remaining matters should be addressed within the framework of these Instructions and in alignment with the core principles outlined above namely: a customer-centric, seamless, cost-efficient, and fully automated porting process, under clear TRC authority and oversight to ensure fairness and competitive neutrality.

Article Number	Article/ Original text	Orange Mobile Comments	Umniah Comments
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"	As for Orange comment, we believe the definition of MNP, as set by the TRC is already clear, sufficient, and consistent with international best practices. It accurately captures the fundamental purpose of MNP without introducing unnecessary operational details. We emphasize that MNP is about ensuring the customer's right to retain their number upon changing operators, irrespective of the specific porting process (e.g., Break Before Make, Make Before Break). Operational aspects such as *switching time* and *technical procedures* should be addressed in the implementation plan and service-level agreements (SLAs), not in the core regulatory definition itself.
1 (c)	Mobile Number Portability Clearinghouse (MNPC) – the entity engaged by the Operators which is authorized by the TRC to operate and	Orange believes that the type of engagement and legal setup between the operators and the MNPC should be clearly identified because it has	We believe that the TRC's current definition is sufficient for the purpose of the regulatory framework at this stage. The TRC's definition clearly establishes that:

	manage the mobile number portability administration service, and centralized database that manage the delivery of number portability services in Jordan.	implications on many aspects, including but not limited to: 1- Cost sharing. 2- Cost allocation during the project (upfront/ postlaunch/ etc) 3- Obligations and liabilities. 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.	• The MNPC must be authorized by the TRC (i.e., no flexibility for multiple or unauthorized entities); and • It will operate a centralized service managing number portability for all operators in Jordan. Details related to cost sharing, cost allocation, obligations, and liabilities are critical, but they are operational matters that should be governed by the subsequent contractual agreement between operators and the authorized MNPC vendor, rather than embedded into the regulatory definition itself.
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.	Umniah agrees that clarification of the term "ranking" within the Mobile Number Portability Administration Rules (MNP Business Rules) is required to ensure a common understanding among all stakeholders. We therefore support Orange request for the TRC to briefly clarify this point. However, we are concerned about the suggestion that the MNP Business Rules would be *"subject to update from time to time based on operators' agreement."* Umniah believes that the MNP Business Rules must remain under TRC's authority and approval to ensure neutrality, regulatory oversight, and the protection of consumer interests. Allowing updates solely based on operators' mutual agreement could introduce risks, conflicting interests, or restrictive practices, all of

			which would undermine the objectives of a transparent, fair, and efficient MNP framework. Accordingly, Umniah supports maintaining the TRC's definition, with only a minor clarification of "ranking".
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.	The purpose of the MNPWG/SG, as defined in the draft instructions, is to facilitate collaboration and provide technical and operational input to support the TRC in its regulatory oversight. Introducing a voting mechanism among operators could result in deadlock situations. Umniah firmly believes that the TRC must retain the final decision-making authority, while ensuring that the MNPWG/SG remains a platform for constructive input. This approach is fully aligned with international regulatory best practices where the regulator supervises and steers the implementation of number portability to protect competition and consumer rights.
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	Umniah agrees with Orange's suggestion to align the definition of "License" with that used 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 communicating 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.	Umniah does not support Orange's proposed amendment to limit the definition of "Customer" to only mobile voice telecom services. Narrowing the definition exclusively to "mobile voice telecom services" would not reflect the full scope of services subscribed to by customers today and could unintentionally exclude important categories of customers who primarily use data services, messaging. Umniah reiterates its previous comments submitted to the TRC, emphasizing that" The draft does not explicitly define the types of mobile subscriptions covered (Standard Mobile voice/data services), which is essential for proper implementation and enforcement. We propose the following amendment: "These Instructions apply to all standard mobile (Voice/Data) subscriptions, subject to the scope defined in the TRC's MNP Business Rules."
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.	Umniah agrees that, for consistency and precision, defined terms should be referenced exactly as they are defined within the Instructions. Accordingly, we suggest amending the sentence to: *"Mobile Number Portability shall be recipient led, requiring the **Recipient Operator** to manage the porting transaction on behalf of the mobile Customer."* This ensures alignment with the defined term "Recipient Operator" & Customer" and maintains clarity throughout the instructions.

2 (b)	Customer porting request will be completed within 24 hours after the request is initiated by the recipient operator.	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. 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). Limited time frame may result in errors, unauthorized ports, or service degradation.	Umniah firmly supports the TRC's instruction that customer porting requests must be completed within 24 hours after initiation by the Recipient Operator. This time frame is reasonable, consistent with international best practices, and critical to delivering a positive customer experience. While we acknowledge that operational challenges such as validation and coordination with third parties (e.g., Law Enforcement Agencies, LEA) may exist, these are internal matters that operators must address through proper system integration, efficient communication protocols, and advance preparation during the MNP implementation phase. Furthermore, the TRC's reference to 24 hours not 24 *working* hours is important to ensure that mobile customers enjoy portability rights at a pace aligned with modern telecom expectations, even across weekends and holidays, similar to global regulatory models. Efficient, reliable, and real-time capable systems should be a basic operational requirement for licensed operators in today's environment. Accordingly, Umniah fully supports maintaining the 24-hour maximum completion time as currently drafted in the TRC's Instructions, without adding exceptions that would weaken the effectiveness of MNP.
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	We suggest rephrasing the clause to become as follows: Customer requesting to use the Mobile Number Portability Service will be required to be identified verified, and documented by the	

	available channel approved by the TRC to initiate their porting request.	recipient operator according to existing processes. On the other hand, this proposed model does not align with how Business-to-Business customers operate: • 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. 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.	
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.	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. On the other hand, the current proposed clause assumes the actual SIM user is the decision-maker. While this may not be the case, especially for Business-to-Business customer, for example: • SIMs are often assigned to employees, not decision-makers. • Many IoT/M2M SIMs have no user interface to receive or send SMS.	Umniah supports the TRC's proposed method of customer validation through a free SMS to the MNPC, as it offers a simple, secure, and standardized approach consistent with international best practices. We note that Orange concerns related to IoT/M2M subscriptions are not applicable to this process, as these types of services are outside the scope of Mobile Number Portability. Regarding Business contracts, we would like to highlight that this matter is already being addressed within the draft Mobile Number Portability Business Rules currently under discussion by the MNPWG, subject to TRC's final approval. While alternative validation mechanisms for B2B accounts could be

		Risk of unauthorized ports or inability to complete validation. A central validation process via authorized business contact (email, portal, digital signature) is required. Orange suggests rephrasing it as follows: 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.	considered, provided that it must be standardized and approved by the TRC to ensure fairness, consistency, and avoid introducing operator-specific exceptions that could complicate or delay the porting process. Importantly, the Donor Operator retains the responsibility to validate the authorization of porting requests in accordance with the Business Rules framework.
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.	Orange proposed to modify the wording of Article 3(a) to state that the TRC will *"facilitate determining"* the appropriate technological and operational solutions, instead of *"determine"* them directly. We do not support this proposed change and recommend retaining the original text, TRC, as the national regulatory authority, should play a central and decisive role in determining the solutions for MNP, not merely facilitating discussions among operators. This is consistent with international best practices, where regulators lead the process to ensure consumer protection, neutrality, and adherence to national policy goals.
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.	While we recognize that discussion among operators is a healthy and constructive part of the process allowing for the exchange of operational insights and the raising of reasonable justifications, the final responsibility for setting implementation deadlines must remain with the TRC.

			TRC's role as an independent regulator is essential to ensure consistency, fairness, and enforceability across all stakeholders. We therefore recommend maintaining the original text with some amendments as stated on our comments submitted to TRC on the draft instructions, which appropriately reflects the TRC's authority to establish nationally aligned, balanced, and binding deadlines for the successful rollout of Mobile Number Portability.
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.	Orange proposes rephrasing Article 3(c) to limit TRC's oversight to matters that are "reported or filed" and to act "in good faith." While we agree that TRC's engagement is and should continue to be fair and transparent, we believe this suggested change unnecessarily narrows the scope of the TRC's oversight function.
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.	• We agree with Orange's point that this clause should be relocated to a section on operator responsibilities, we suggest removing clause (d) from Article (3) and adding the following to Article (2) as a new first clause: *" a) Each mobile operator shall ensure that its network, systems, and internal procedures are fully prepared for the implementation and operation of Mobile Number Portability, in accordance with the TRC-approved implementation plan"*. • We do not support Orange proposed rewording of this clause. While we acknowledge that each operator is best positioned to assess its internal network readiness, we believe Orange's proposed rewording allowing operators to define their

			own "expected date of readiness" introduces ambiguity and undermines the principle of a unified implementation plan. Internal technical projects should be managed in parallel with regulatory obligations. Accordingly, we stressed on our position that each mobile operator shall ensure its network, systems, and processes are prepared to support the implementation of Mobile Number Portability in accordance with the TRC approved implementation plan and rollout timeline.
4	Article (4) Mobile Number Portability Working Group/ Steering Group MNPWG/SG:	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. 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.	Orange's comment proposing the revival of a separate "Industry Forum" lacks clarity and is not justified given the current stage of market maturity and the role already defined for the MNPWG/SG under TRC supervision.

In 2005, when Mobile Number Portability was still an emerging regulatory concept worldwide, the formation of an Industry Forum made sense; it was necessary to explore and investigate the most suitable approaches for implementation. However, the global telecom environment has evolved significantly over the past two decades. MNP is now a standardized and mature regulatory practice, adopted across nearly all developed and developing markets. We are not starting from a blank slate. All mobile operators operating in Jordan are part of multinational groups, many of which have successfully implemented MNP in other affiliates under similar or more complex market and technical conditions. There is no compelling need to diverge |

		Accordingly, Orange believes that TRC should extend the MNPWG work scope to take the role of the Industry Forum mentioned above. 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: • Technical specs. • Testing scenarios. • Policy recommendations.	from international best practices or to reinvent structures that were relevant only during earlier adoption phases. Moreover, the TRC's existing MNPWG/SG structure already includes executive-level and cross-functional representation from all stakeholders and is designed to address technical, operational, commercial, and policy-related aspects of MNP implementation. This model is fully aligned with global regulatory approaches, where the regulator-led working group oversees all key decisions without the need to separate "strategic" and "execution" bodies. Accordingly, we recommend maintaining the current structure of the MNPWG/SG under the oversight of the TRC with an amendment as outlined in our comments submitted to TRC on the draft instructions. It is sufficient, appropriate, and aligned with international standards.
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.	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). 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.	The TRC's clause explicitly states that the Mobile Number Portability (MNP) service shall be free of charge to customers, and that mobile operators shall not levy porting fees. This clause is clearly focused on protecting mobile subscribers not fixed-line subscribers, and falls fully in line with international best practices, where MNP is typically offered at no cost to the end user to maximize uptake and enhance competition. We believe that Orange's reference to Fixed operators bearing no cost is misplaced in this context. Article 5(a) applies strictly to mobile operators and mobile

			porting. Any obligations or routing costs for fixed operators, where applicable, are considered under separate clauses related to interconnection and routing and are not relevant to this customer-facing clause.
5 (b)	All mobile operators shall share in the costs of the MNPC set-up and operation and additional traffic conveyance.	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. Also, please refer to our general comments point #2.	Orange's suggestion to impose porting fees on mobile users directly contradicts the fundamental goal of MNP to empower users to switch easily and without financial disincentives. Allowing operators to recover costs from customers would hinder MNP adoption and weaken competitive pressure in the market. As for cost-sharing, it should be simple and fair, that the TRC's approach to having mobile operators equally share the MNPC setup and operating costs is straightforward, administratively efficient, and consistent with the principle that all operators benefit from a functioning MNP system. Orange's suggestion to base cost-sharing on "network differences" or "perceived benefit" is subjective, difficult to administer, and risks triggering ongoing disputes. As for Orange's suggestion that Recipient Operators should cover fixed operator costs, it is not justified in this context. Fixed operators that originate traffic to ported numbers must ensure their own routing systems are updated to correctly deliver traffic. This is a basic interoperability obligation and should not be subsidized by mobile Recipient Operators.
5 (d)	New point to be added	Orange demands to add a new clause to this article as follows:	Orange's suggestion that "Fixed operators shall not bear any cost for MNP implementation or traffic routing costs" is not justified. Fixed operators that

		5 (d) Fixed operators shall not bear any cost for MNP implementation or traffic routing.	originate traffic to ported numbers must ensure their own routing systems are updated to correctly deliver traffic. This is a basic interoperability obligation. Exempting Fixed operators from bearing any cost related to routing or MNP adaptation would create an unfair burden on mobile operators and introduce asymmetry into the ecosystem. Additionally, if Fixed operators do not adapt their systems and processes accordingly, they risk service inability to deliver calls to ported numbers, leading to poor customer experience and potential loss of subscribers. Furthermore, the TRC's current draft rightly limits mandatory cost-sharing for MNPC setup to mobile operators, while expecting all originating networks mobile and fixed to update their routing systems as part of their standard operational responsibilities. This ensures both fairness and technical reliability.
6	Article (6) Tariff Transparency	Orange believes that tariff confusion is a big risk 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.	Orange's comment regarding tariff transparency lacks clarity in the context of this clause. While Orange emphasizes concerns particularly for Business-to-Business customers, tariff transparency challenges are inherent to all mobile users, including individual & business subscribers. Clear communication of on-net versus off-net charges is essential across all customer segments, not solely for corporate customers. Therefore, we believe that any approach to improving tariff transparency should be universal, simple, and applicable to the entire market to ensure fairness, ease of use, and alignment with international best practices.

7	Article (7) Mobile Number Portability Clearinghouse (MNPC)	please refer to our general comments point #9.	Our understanding, based on the MNP RFP, is that the MNPC will operate as a centralized service provider, authorized and overseen by the TRC and contracted by the licensed mobile operators through a multi-party agreement. This model is already well-articulated in the RFP. That said, we believe it would be beneficial to explicitly establish a clear legal or contractual reference within the regulatory framework to affirm TRC authority over the MNPC vendor. This should include provisions that enable the TRC to ensure the vendor's compliance with its obligations, uphold the neutrality of the clearinghouse, monitor service quality and performance, resolve disputes, and enforce service level agreements (SLAs). Clarifying this authority within the Instructions will provide greater regulatory certainty and support effective oversight of the MNPC's role in the MNP ecosystem.
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.	The TRC's approach to equal cost-sharing among mobile operators is simple, transparent, and fair. This model is standard in international MNP implementations, where all licensed mobile operators share in the setup and operational costs of the portability clearinghouse. As for performance audit, we agree in principle with the idea of holding the MNPC accountable for its service levels. However, audit mechanisms and SLAs should be defined in the RFP framework and will be included in the multi-party agreement between operators and the MNPC provider. We believe that such audit performance should be implemented

		through contract enforcement and monitored under TRC oversight.
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-ported numbers. All operators shall reach an agreement on the technical and architectural solution for Mobile Number Portability implementation.	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.	We believe that Indirect routing, where the Donor Operator determines whether a number is ported and re-routes traffic, is widely considered obsolete and inefficient. It was phased out in most mature MNP implementations more than a decade ago due to: • Higher call setup times • Network congestion risks • Unnecessary load on Donor networks • Vulnerabilities in lawful interception and emergency call handling • Lack of transparency and routing control. In the event that any Fixed operator presents technically justified limitations in integrating All Call Query (ACQ) within their legacy systems, we believe this issue should not hinder the overall MNP implementation timeline. Accordingly, we suggest that this specific integration challenge be addressed in coordination with the MNPC vendor, whose technical experience across different markets positions them well to assess such cases and propose practical solutions. This vendor-led discussion should take place within the MNPWG, ensuring that the outcome is technically sound, fair to all stakeholders, and aligned with TRC's overall implementation framework.
8 (b)	Mobile operators are required to implement and operate automated porting processes interworking the operator's business systems with the	Please refer to our general comments point #8.	Modern MNP frameworks across the globe are based on fully automated porting processes to ensure speed, reliability, and consistency. Introducing or accommodating manual steps would increase error

	MNPC to automatically process the defined validation, deactivation and activation services once the initial porting request is submitted to the central number portability clearinghouse by the recipient operator		rates, prolong porting timelines, and degrade the customer experience contrary to the objectives of the MNP framework. We believe that operators' internal system readiness should not determine the regulatory standard. Instead, operators should align their systems with TRC's national framework and timeline, just as they do with other mandated upgrades. Accordingly, we believe that the MNPC RFP already allows flexible interfacing methods (e.g., API, SOAP, HTTP) that can support legacy environments. These technical pathways can be leveraged without compromising the overarching goal of automated, end-to-end porting.
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.	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: 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.	We strongly object to this proposal and recommend that the original wording be fully maintained. A voting mechanism among operators risks paralyzing the process. Taking into consideration that globally, the role of working groups such as the MNPWG is advisory in nature, facilitating technical input and operational coordination. However, the final decisions on policy, implementation timelines, and conflict resolution must always rest with the regulator, to ensure fair and consistent MNP implementation.
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	Orange suggests rephrasing this article as follows to ensure fairness: Any mobile operator that intentionally commits a fraudulent port shall bear all the costs for	Orange suggestion that penalties should only apply *"if proven by the concerned authority"* risks creating delays and disputes over jurisdiction. TRC, as the sector regulator, is the competent authority under

	the license agreement and TRC Regulations.	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. In addition, there should be a clear definition for "Fraud".	existing telecommunications law and licensing frameworks to investigate and penalize non-compliance, including fraudulent porting behavior. As for the requested definition for "Fraud", we believe that the definition and examples of fraudulent porting can be developed and agreed through the MNP Business Rules, with TRC maintaining enforcement authority.
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.	Please refer to our general comments point #13. 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. 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: • Active managed service contract. • Ongoing payment dispute. • Number tied to critical infrastructure (e.g., ATMs, smart meters). • Non-matching identification, • Fraud risk, • Unresolved billing.	We believe Orange's request is premature at the level of the regulatory Instructions. Detailed operational scenarios and case-specific conditions are more appropriately addressed within the MNP Business Rules, as referenced in clause (d) of this draft, which is currently under discussion within the MNPWG and subject to TRC's final approval.
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	Please refer to our general comments point #13. Also, in addition to our comment on the definition of "Business Rules", Orange believes that the Business Rules must cover: • Delegated authority. • Hierarchical account ownership. • Transition lines for critical services.	We support the TRC's approach in referencing the Mobile Number Portability Business Rules as the proper framework to define detailed processes, operator responsibilities, and customer safeguards. This structured approach ensures flexibility in operational implementation while maintaining TRC's regulatory oversight and approval authority.

	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.		
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.	We strongly believe that the TRC, as the independent national regulator, must retain final authority to approve all decisions related to MNP implementation, particularly those concerning business rules, operational processes, and timelines. Removing TRC's approval role and replacing it with an operator-only voting mechanism risks turning regulatory oversight into a consensus-driven negotiation process, could impact the progress of the MNP implementation. Voting within the MNPWG is useful for gathering consensus and input, but it must not override TRC's regulatory powers. In fact, Article 12 of the Telecommunications Law gives TRC full authority to issue and enforce instructions necessary for market regulation. TRC's inclusion in the MNPWG as a participant does not diminish its separate role as the final decision-making entity.
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	Please refer to our general comments point #3. 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. Furthermore, the penalty for not meeting milestones could be unfair if delays result for reasons that are out of the operator's control.	We do not support Orange's suggestion to relax the timeline and recommend maintaining the 12-month deadline as defined by TRC. We believe that 12 Months is reasonable and aligned with International Practice TRC's proposed timeline is fully consistent with global benchmarks. Many countries with more complex

	operators will be required to meet. Any mobile operator that fails to 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.		telecom environments have successfully implemented MNP within similar or shorter periods.

Concerning B2B complexity (e.g., bundled services or integration with IT systems) should be addressed within the MNP Business Rules, through tailored processes or validation steps. This does not require delaying the national MNP launch for all customer types.

The TRC's inclusion of penalties for non-compliance is standard regulatory practice and essential to ensure accountability. The penalties are not arbitrary, they are tied to failure to meet clearly defined and agreed-upon milestones. Moreover, we believe that any unforeseen delays can be communicated and managed through TRC oversight, without removing the enforcement mechanism altogether. |
| 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. | We believe that The TRC's Instructions are intended to define high-level regulatory obligations and governance structures not to serve as a substitute for commercial agreements. Indemnification clauses are typically addressed within the multi-party contract between operators and the MNPC provider, where roles, liabilities, and remedies are defined with legal precision and context.
We see that including such wording in a regulatory instrument without context or limitations introduces legal uncertainty and could trigger unnecessary disputes, especially in cases involving subjective claims of "damage". Instead, liability, service failure consequences, and indemnification should be addressed within the contractual and SLA framework |

			between TRC, operators, and the MNPC vendor, under TRC oversight.
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."	We agree with the importance of safeguarding customer data, and we support the principle that all parties involved in the MNP process must comply with applicable data protection laws. However, we believe that the proposed clause while well intentioned is already addressed implicitly through existing legal and regulatory frameworks and therefore does not need to be separately stated in the Instructions. All licensed telecom operators and service providers in Jordan are already subject to national laws and regulations concerning data privacy, cybersecurity, and confidentiality. These obligations apply regardless of whether they are restated in the MNP Instructions. If additional clarity is needed, we suggest the appropriate place to include technical and operational data handling procedures (e.g., retention periods, access roles, anonymization practices) in the MNP Business Rules and the MNPC service contract.
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.	We believe that financial risk allocation, cost recovery, or chargeback mechanisms are a matters that should be handled through the MNP Business Rules or inter-operator agreements, not the high-level regulatory Instructions. Including such provisions in the Instructions overcomplicates the document and may introduce unintended legal implications.
New Clause		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:	We do not support Orange proposal, stressing that the recipient-led model is the widely accepted standard in successful MNP implementations, precisely because it protects consumers from unnecessary delays and interference by the Donor

		Donor Operator may verify ownership to prevent fraud prior to deactivation.	Operator. Reintroducing donor-level approval would defeat the purpose of recipient-led porting, reintroduce friction, and risk customer churn suppression. Fraud is mitigated by robust subscriber validation mechanisms at the MNPC level such as SMS confirmation, digital KYC, and secure authorization steps. These mechanisms are designed to verify identity before porting is approved and do not require Donor Operator involvement at the decision stage.
New Clause		As there is no MNPC SLA penalties or reporting. Orange suggests adding the following clause: MNPC subject to SLA metrics and penalties; must publish quarterly performance reports.	While we support the principle of ensuring accountability and transparency from the MNPC, we believe that the SLA should be defined in the RFP and contractual framework that should include detailed provisions on Service Level Agreements (SLAs), performance metrics, reporting obligations, and penalties for non-compliance. These requirements are binding on the vendor and will be enforced through the multi-party agreement between operators and the MNPC provider, under TRC oversight.

Orange Fixed General Comments	Umniah Feedback
1. 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).	Umniah's detailed responses to those points have been addressed comprehensively in our reply to Orange Mobile's submission. Therefore, we refer to those responses as applicable to Orange Fixed's similar comments, rather than repeating them here individually.
2. Legacy networks (Fixed network as an example) 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.	Umniah's detailed responses to those points have been addressed comprehensively in our reply to Orange Mobile's submission. Therefore, we refer to those responses as applicable to Orange Fixed's similar comments, rather than repeating them here individually.

Specific Comments on Articles:

Article Number	Article/ Original text	Orange Fixed Comments	Umniah Comments
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.	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).	Orange Fixed's suggestion that "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." is not justified. Fixed operators that originate traffic to ported numbers must ensure their own routing systems are updated to correctly deliver traffic. This is a basic interoperability obligation. Exempting Fixed operators from bearing any cost related to routing or MNP adaptation would create an unfair burden on

			mobile operators and introduce asymmetry into the ecosystem. Additionally, if Fixed operators do not adapt their systems and processes accordingly, they risk service inability to deliver calls to ported numbers, leading to poor customer experience and potential loss of subscribers. Furthermore, the TRC's current draft rightly limits mandatory cost-sharing for MNPC setup to mobile operators, while expecting all originating networks mobile and fixed to update their routing systems as part of their standard operational responsibilities. This ensures both fairness and technical reliability.
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.	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).	We do not support this proposal, as it is inconsistent with technical principles of interconnection and the best international practices in number portability. This clause clearly addresses the prohibition of charging end users (mobile customers) for porting and is not intended to determine cost allocation between fixed and mobile operators. Orange Fixed's interpretation is misplaced in this context.
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.	We do not support the proposed clause, as it introduces an unfair and unjustified exemption that contradicts established regulatory norms and technical obligations in number portability frameworks. In mature MNP markets, all originating operators fixed and mobile are required to implement routing capabilities and bear the associated costs as part of their obligation to support the national portability system. There are no exemptions granted to fixed operators in this regard. Taking into consideration that Fixed operators also benefit from MNP functionality that the Fixed networks that originate calls to mobile numbers benefit from access to accurate routing and service continuity.

			Therefore, it is both fair and necessary that they contribute to technical readiness and interoperability.
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-ported numbers. All operators shall reach an agreement on the technical and architectural solution for Mobile Number Portability implementation.	Legacy networks (Fixed network as an example) 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.	We believe that Indirect routing, where the Donor Operator determines whether a number is ported and re-routes traffic, is widely considered obsolete and inefficient. It was phased out in most mature MNP implementations more than a decade ago due to: • Higher call setup times • Network congestion risks • Unnecessary load on Donor networks • Vulnerabilities in lawful interception and emergency call handling • Lack of transparency and routing control. In the event that any Fixed operator presents technically justified limitations in integrating All Call Query (ACQ) within their legacy systems, we believe this issue should not hinder the overall MNP implementation timeline. Accordingly, we suggest that this specific integration challenge be addressed in coordination with the MNPC vendor, whose technical experience across different markets positions them well to assess such cases and propose practical solutions. This vendor-led discussion should take place within the MNPWG, ensuring that the outcome is technically sound, fair to all stakeholders, and aligned with TRC's overall implementation framework.
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	The 12 months period is not a realistic plan given the changes that need to be done on the network for MNP and given existing Core network projects affecting MNP call flow.	Numerous countries with large and complex telecom markets have successfully implemented MNP within 12 months or less. If Orange Fixed faces genuine limitations, they should be addressed in coordination with the MNPC vendor, under TRC oversight, and within the existing implementation timeline. This

	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 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.	Indeed, legacy networks (Fixed network as an example) 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.	approach balances flexibility with accountability without weakening the regulatory standard or delaying the project.