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

Orange Fixed 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. 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).

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.

Specific Comments on Articles:

Article Number	Article/ Original text	Orange Fixed Comment
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).
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).
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.
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	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,

	architectural solution for Mobile Number Portability implementation.	the Donor Operator has the responsibility to determine whether the called party is a ported number and route the call to its subscription network.
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 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.	The 12 months period is not a realistic time plan given the changes that need to be done on the network for MNP and given existing Core network projects affecting MNP call flow. 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.