

Orange Fixed's comments on Umniah'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 Umniah's comments on the draft "Instructions for Implementing Mobile Number Portability in Jordan" published by TRC on 23/4/2025 and is kindly asking TRC to take the comments and suggestions below into consideration.

Orange would like to clarify that, in responding to Umniah's comments published by TRC, Orange is providing feedback without prejudice to its position as stated in its response sent in its letter no. 6/19/25/22/3134 dated 20/4/2025.

Orange would like first to emphasize that the scope of these instructions is limited to mobile services. Accordingly, we object and reject any comment made by Umniah that suggests including fixed operators and/or fixed networks and/ or fixed services within the scope of these instructions and/ or project.

TRC Instruction-Article	Umniah Comments	Orange Response on Umniah's Comments
Article (1) Definitions The expressions, phrases and acronyms used in these instructions shall have the following meanings. a) Mobile Number Portability (MNP): the ability of mobile customers to retain their mobile numbers when changing the mobile network operator. b) All Call Query (ACQ) - means direct traffic routing where the originating network, prior to establishing any call or SMS, determines the network to which the called number is currently located. All Call Query direct routing shall be used for all traffic originated and terminated in Jordan. 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 manages the delivery of number portability services in Jordan. d) Donor Operator - is the operator to whom the mobile number belongs at the time the subscriber makes a request for porting. 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-porting numbers, including but not limited to transit (signaling) and the database look up costs.	<p>The current definition of "Operator" is limited to mobile service providers, excluding other licensed entities such as fixed-line operators.</p> <p>However, these licensees also originate and terminate calls to mobile numbers and are therefore directly involved in the routing of traffic to ported numbers.</p> <p>To maintain the integrity and efficiency of the MNP system, all licensees involved in call origination must interface with the central MNPC database. This is especially critical in an All Call Query (ACQ) routing environment to ensure accurate call delivery. The exclusion of fixed operators from the definition of "Operator" may create uncertainty and weaken enforcement of routing obligations. We suggest including a clarifying clause that all licensees involved in call origination (mobile, fixed) must comply with routing and database update obligations related to MNP. Since Tariff Transparency is referenced in Article 6, we suggest that it should be clearly defined, "Tariff Transparency refers to the ability of subscribers to clearly and easily identify, before initiating a call or session, whether the destination number is on-net or off-net"</p>	<p>Orange does not agree with Umniah's comment the "Operator" definition, as the scope of these instructions is limited exclusively to mobile services,</p> <p>Orange would like kindly to confirm what was mentioned earlier in its response on the instructions that 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) would be really needed.</p> <p>Orange kindly confirms its position that addressed in its response to the drafted instructions that it should not bear any costs in MNP .</p> <p>Moreover, each originating network including fixed operators shall, when technically feasible</p>

<p>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.</p> <p>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.</p> <p>h) License means License Agreement and all Schedules attached thereto, as amended or modified in accordance with the terms thereof.</p> <p>i) Licensee means a person who has acquired a License in accordance with the provisions of the Law.</p> <p>j) Operator An operator is a licensee who runs a telecommunications system under a license granted in accordance with the Telecommunications Law No.13 for the year 1995 and its amendments and provides mobile services in Jordan.</p> <p>k) Recipient Operator is the operator who will provide communications service to the subscriber after porting.</p> <p>l) Customer means any Person who has entered into a contract with the Licensee for the provision of mobile telecom services.</p>		<p>and proven to the MNPWG if else, establish a connection to the centralized MNP for real time updates of porting transactions. However, re-emphasizing the concept we have for centralized MNP database, is that interrogating the MNP database shall be to the local copy in each operator that is real time updated from centralized MNP, while for ACQ, accessing the MNP per call shall be to the local MNP database copy and not to the centralized.</p>
<p>Article (3) Role and Involvement of the TRC</p> <p>a) The TRC will work with the related operators through working and steering groups (MNPWG\SG) to determine appropriate technological and operational solutions to implement Mobile Number Portability.</p> <p>b) The TRC will oversee the deployment of mobile portability by establishing reasonable deadlines for implementation.</p> <p>c) The TRC will continue to maintain oversight over any procedural or technical issues and disputes that may arise.</p> <p>d) Each mobile operator shall ensure its own network readiness for implementing Mobile Number Portability.</p>	<p>While Article (3) appropriately outlines the TRC’s central role in coordinating and overseeing the implementation of Mobile Number Portability, we believe it would be beneficial to further articulate the TRC’s enforcement powers in relation to ensuring timely compliance with implementation milestones.</p> <p>Given the complexity and multi-stakeholder nature of the MNP project, the success of implementation relies not only on collaboration but also on clearly defined accountability. Clarifying the TRC’s ability to take appropriate regulatory action in case of delay or non-compliance that would help reinforce its leadership role and ensure all parties remain aligned with the timeline plan and expectations. This enhancement would also serve as a proactive measure to minimize the risk of procedural delays or misinterpretation among stakeholders.</p> <p>We respectfully propose the addition of a clause under Article (3), as below: “The TRC may issue binding directions and take appropriate regulatory measures, including the imposition of penalties, in cases of non-compliance with agreed implementation milestones or any action that may hinder or delay the MNP rollout.”</p>	<p>Orange would like to point out that penalties and their conditions for enforcement are already clearly set out in the license agreements signed between the TRC and licensees.</p> <p>As such, any new penalties, or modifications to penalty clauses through these instructions would not override the license agreement provisions. Therefore, there is no need to introduce or refer to penalties again within the MNP instructions.</p> <p>Orange believes that the best way to manage Mobile Number Portability (MNP) is through a reasonable and step-by-step approach, not by using penalties. This is in line with global best practices, which focus on clear responsibilities, flexible timelines, and regular progress checks. Based on this, Orange believes that the best</p>

	<p>Clause (d) assigns responsibility to operators, not to the TRC. Therefore, we believe its placement under an article titled “Role and Involvement of the TRC” is not entirely appropriate. Accordingly, we suggest removing clause (d) from Article (3) and adding the following to Article (2) as a new first clause:</p> <p>“ 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”.</p>	<p>approach is to promote transparency, set clear and measurable obligations, and apply a fair and gradual regulatory framework.</p>
<p>Article (4) Mobile Number Portability Working Group/ Steering Group MNPWG/SG:</p> <p>The TRC will oversee the establishment of the MNPWG/SG. The MNPWG will define and recommend technological and operational solutions to the TRC and as well as being responsible for the timely and successful implementation and introduction of the Mobile Number Portability service. The MNPWG will oversee and provide executive stakeholder support for the Mobile Number Portability implementation programme as well as providing mediation support and executive sign-off of key programme milestones.</p>	<p>Article (4) outlines the formation and responsibilities of the MNP Working Group/Steering Group (MNPWG/SG), including its role in developing and recommending technical and operational solutions. However, the current wording does not specify a mechanism for decision-making in the event of a disagreement or deadlock within the group.</p> <p>It is important to ensure that the implementation process is not delayed by a lack of consensus within the working group. Clarifying that the TRC retains final decision-making authority in such cases will help to maintain momentum and ensure that key milestones are met without unnecessary delays. This approach is consistent with the TRC’s regulatory mandate and leadership role in overseeing national telecom initiatives.</p> <p>We kindly suggest adding the following clause:</p> <p>“In the event of a disagreement or failure to reach consensus within the MNPWG/SG, the TRC shall have the authority to issue final and binding decision to ensure timely progress of the Mobile Number Portability implementation.”</p>	<p>Orange strongly disagrees with Umniah comment on article 4. As MNPWG now remains the only channel through which operators can present their network’s needs and systems’ requirements, and as disagreement typically would be due to operator-specific and network-specific reasons, reflecting the circumstances of each operator. Therefore, it would not be appropriate for TRC to issue a final decision that would uniformly apply to all operators.</p> <p>However, Orange would like also to kindly emphasize that the role of the MNPWG is clearly defined in the Terms of Reference, and that MNPWG members use voting as a mechanism to make decisions, therefore enforcement of decisions by TRC will not be justified</p>
<p>Article (5) Cost:</p> <p>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> <p>b) All mobile operators shall share in the costs of the MNPC set-up and operation and additional traffic conveyance.</p> <p>c) Each mobile operator shall bear its own cost for internal network set-up.</p>	<p>While Article (5) sets the high-level cost principles, further clarification is needed to avoid ambiguity around cost-sharing responsibilities and inter-operator charges.</p> <p>1. Clause (b) refers to sharing “additional traffic conveyance” which we believe is not the case, each operator should bear its own internal and incremental conveyance costs.</p> <p>2. The said article does not specify if per-port transaction fees between operators (from Recipient Operator to Donor Operator) will be applied. Lack of clarity here could result in inconsistent practices or create financial barriers to porting. Additionally, it is important to clearly distinguish internal operator costs, shared MNPC costs, and per-port operational charges.</p> <p>We suggest the following clarifications and additions to ensure a fair and transparent cost framework:</p>	<p>Regarding fixed operators, Orange believes that although fixed operators are operationally important for routing, they will not derive any commercial benefit from MNP since the project scope is exclusively for mobile services.</p> <p>Therefore, Orange would like to kindly confirm that:</p> <ul style="list-style-type: none"> Fixed operators must not bear any share of costs associated with the implementation of MNP. Fixed operators must be compensated for any direct or

	<p>1. Each operator should bear its own internal and incremental conveyance costs, such as database queries and routing upgrades.</p> <p>2. The MNPC set-up and operational costs should be shared equally among all mobile operators, unless otherwise determined by the TRC.</p> <p>3. No per-port fee should be imposed on the Recipient Operator to Donor Operator, unless explicitly approved and capped by the TRC to avoid discouraging number portability.</p> <p>4. Clarify that no additional routing charges should be passed between operators or to subscribers.</p> <p>5. All licensed operators (mobile and fixed) must access and update the central routing database to ensure accurate delivery of calls to ported numbers.</p>	<p>indirect costs or damages it incurs as a result of participating in the MNP operations.</p> <p>However, Orange kindly stresses on its position regarding the cost mentioned in our response on the instructions.</p> <p>Orange also believes that details and mechanism related to costing shall be discussed and agreed between the MNPWG.</p>
<p>Article (7) Mobile Number Portability Clearinghouse (MNPC)</p> <p>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</p>	<p>While Article (7) establishes the centralized clearinghouse function, it does not clarify how ported number data will be accessed or updated by all relevant operators, including fixed-line operators who also originate/terminate calls to mobile numbers.</p> <p>To ensure the correct routing of calls and messages in the All Call Query (ACQ) environment, all licensees (not just mobile operators) must have timely and consistent access to accurate routing data from the MNPC.</p> <p>Although the technical details of integration can be handled by the MNPWG, the regulatory requirement for access and timely updates should be clearly stated in the Instructions to avoid gaps in implementation and enforcement.</p> <p>Suggested amendment to Article (7):</p> <p>“The central MNPC database of ported numbers shall be made accessible to all licensed operators (including mobile & fixed licensees) to support accurate All Call Query (ACQ) routing. All licensees shall be required to update their routing information in a timely manner with each number porting through real-time database access provided by the MNPC.”</p>	<p>Due to possible technical limitations at originating network, accessing the centralized MNP database may not be direct from the originating network, instead, it is left to the originating network to build the technical setup that shall allow accessing on real time for all calls to mobile ranges a real time updated local MNP database to decide on call routing (example; capitalizing on a local portability database copy that will assist to overcome these technical limitations.</p> <p>In all ways, for ACQ, call by call access to the MNP data shall be possible to a local copy always and not to the centralized MNP database.</p>
<p>Article (8) Technical/Architectural Solutions</p> <p>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</p>	<p>Article (8) appropriately mandates All Call Query (ACQ) direct routing for mobile operators; however, it does not explicitly extend this obligation</p>	<p>Due to possible technical limitations at originating network, accessing the centralized MNP database may not be direct from the originating network, instead, it is left to the</p>

<p>operators shall reach an agreement on the technical and architectural solution for Mobile Number Portability implementation.</p> <p>b) Mobile operators are required to implement and operate automated porting processes that interconnect 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</p>	<p>to all licensees, including fixed-line operators, who also originate traffic to mobile numbers.</p> <p>Accurate and efficient routing of calls and messages to ported numbers depends on all originating networks (whether mobile or fixed) having access to and implementing the ACQ solution. Limiting this obligation to mobile operators risks inconsistent routing practices and could compromise the integrity of the MNP system. To ensure complete interoperability and prevent routing errors, it is essential that the obligation applies uniformly to all telecom licensees who originate traffic in Jordan.</p> <p>We respectfully suggest revising the article to explicitly include all licensed operators, and to emphasize the prohibition of fallback routing methods such as onward forwarding, which can lead to inefficiencies and call failures.</p> <p>Proposed amendment to Article (8):</p> <p>"All Licensees including mobile and fixed-line operators, shall implement and operate All Call Query (ACQ) direct routing for all calls and messages originated and terminated in Jordan, to ensure accurate delivery to the current network of the dialed number. This obligation applies to any Licensee originating traffic to a ported number."</p>	<p>originating network to build the technical setup that shall allow accessing on real time for all calls to mobile ranges a real time updated local MNP database to decide on call routing (example; capitalizing on a local portability database copy that will assist to overcome these technical limitations.</p> <p>In all ways, for ACQ, call by call access to the MNP data shall be possible to a local copy always and not to the centralized MNP database.</p>
<p>Article (9) Procedural Matters</p> <p>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> <p>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> <p>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> <p>d) The Mobile Number Portability service will be governed by the</p>		<p>Orange would like to kindly emphasize that the role of the MNPWG is clearly defined in the Terms of Reference, and that MNPWG members use voting as a mechanism to make decisions, therefore enforcement of decisions by TRC will not be justified.</p>

<p>provisions defined in 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> <p>e) Mobile operators shall issue customer education guidelines that outline porting procedures in order to better inform customers and to ensure a smooth porting transition.</p>		
	<p>While the current draft provides a solid foundation for the initial implementation of Mobile Number Portability (MNP) and given the dynamic nature of telecommunications services and the likelihood of new operational, technical, or regulatory considerations may emerge over time. To maintain the relevance and effectiveness of the MNP framework, it is important that the TRC retains the ability to adapt the Instructions when needed.</p> <p>Flexibility is essential to ensure that the TRC can respond to evolving market needs, refining porting procedures, addressing unforeseen challenges, or adjusting cost-sharing and service level frameworks. Jordan's Telecommunications Law (Article 12(a)(2)) already empowers the TRC to issue necessary regulatory decisions, and it would be appropriate to reflect this capability explicitly in the MNP Instructions to avoid ambiguity, ensuring that such decisions are discussed with operators in advance would promote transparency, cooperation, and practical alignment with market realities.</p> <p>We suggest adding the following article to the draft instructions which we believe it would ensure that the regulatory framework remains responsive, resilient, and future proof, enabling the TRC to safeguard the success and sustainability of MNP in Jordan, and affirms the importance of consultation with licensed operators:</p> <p>Proposed Article (11):</p> <p>"The TRC may, as necessary, issue supplementary decisions, guidelines, or amendments to these Instructions to address any technical, operational, or regulatory issues that may arise during the implementation or continued operation of Mobile Number Portability.</p> <p>Prior to issuing such decisions, the TRC will consult with the concerned licensees through the MNP Working Group or other appropriate consultation channels. All licensees shall be required to comply with any such decisions or updates issued by the TRC in relation to MNP."</p>	<p>Orange believes that the issuance of any new or supplementary instructions, guidelines, or any similar legislations should be adequately justified and should be carried out in accordance with the Rules Making Instructions.</p>