

Zain Response on Orange Mobile on MNP Draft Instructions

#	Article	Orange Comments	Zain Response
	Article (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”	We support the definition suggested by orange, where Switching is used instead of changing to care for the “Break before Make” principle.
1	Article (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.	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: 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.	We agree with orange that the term “engage” is vague and open the room for different unidentified interpretations and might have unwanted implications on many aspects such as costing and contractual obligations. The term “engage” should be removed or replaced by a more acceptable term
2	Article (1) (e) Additional Conveyance Costs - are the specific extra costs incurred by an	Orange would like TRC to elaborate more on the look-up cost, as it’s not defined.	It should be clearly stated that the cost is borne by the Recipient Operator, not the Doner Operator.

	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.		We also agree with Orange that the Look-up cost is not defined
	Article (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.	The Ranking term is not clear nor i defined, we also see that Orange's suggested definition for the MNP Business Rules Document is more accurate and acceptable.
	Article (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.	We agree with orange call for a "neutral" WG that is not influenced by any party.

3	Article (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	Agree, the definition of the License must be in line with the definition in the Telecom Law
	Article (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	Agree, the definition of the License must be in line with the definition in the Telecom Law
4	Article (1) (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.		The term Operator is not consistently capitalized throughout the body of the instructions, it should be capitalized as it's already defined.
5	Article (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.	Agree with orange comment, we also refer to the missing word (providing)
	Article (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.	Agree with orange comment, the definition should clearly refer to Voice telecom service.
6	Article (2) (a) Mobile Number Portability shall be	We suggest rephrasing it as follows to be in line with the definition.	We request to have the option "Donor-led Porting" to be available until is decided upon by the MNPWG/MNPSC.

	Recipient Led requiring the recipient operator to manage the porting transaction on behalf of the mobile customer.	Mobile Number Portability shall be recipient led requiring the recipient operator to manage the porting transaction on behalf of the mobile customer.	
7	Article (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.	We agree with Orange that the stated timeline is very tight and is not adequate to handle all activities required before porting, including validation, verification and assuring all financial and contractual obligations are met by the porting customer, However, we stress on our view that all SLA's should be agreed on by MNPWG/MNPSC before implemented, and in all cases shouldn't be mentioned here in the instructions.
8	Article (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, verified, and documented by the recipient operator according to existing processes. On the other	We agree with orange comment that The Customer requiring Porting Service will be required to be identified, verified, and documented by the recipient operator according to existing processes We insist that the porting customer must visit the Recipient shop, any other channels could

	channel approved by the TRC to initiate their porting request.	<p>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 administered by an operator to facilitate the MNP process especially for corporate accounts. Also, Orange suggests clearly stating official digital channels as one of the options.</p>	lead to fake/wrongful porting and trigger further complications.
9	<p>Article (2) (d)</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 sending a free of charge SMS to the MNPC.</p>	<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. 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. 	<p>We agree with Orange comment that the validation shouldn't be solely through SMS, as there is a risk of unauthorized or fraudulent porting, especially that the SIM owner might not be the decision maker for the porting, or in the cases the line couldn't/didn't receive the validation SMS.</p> <p>We believe that Porting transaction data and KYC information should be forwarded to the Doner Operator as well.</p> <p>The Recipient operator's agent must check the customer documents and send the signed checkup form to the donor operator to confirm the authenticity of the customer line in order to initiate proper porting process.</p>

		<ul style="list-style-type: none"> • Risk of unauthorized ports or inability to complete validation. <p>A central validation process via authorized business contact (email, portal, digital signature) is required. 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>	
10	<p>Article (3) (a)</p> <p>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>Orange suggests rephrasing it as follows:</p> <p>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.</p>	<p>We agree with Orange call for TRC to “Facilitate” the selection process, where by the role of choosing a technological and operational solution should be solely done by the operators themselves who specifically know about the requirements, workflows, and performance expectations.</p> <p>MNPWG\SG can decide cost allocation and recovery, agree on SLA time frames, agree on final business rules, etc..</p>
11	<p>Article (3) (b)</p> <p>The TRC will oversee the deployment of mobile portability by establishing reasonable deadlines for implementation.</p>	<p>We suggest rephrasing this article as follows:</p> <p>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.</p>	<p>We support the suggested definition by Orange that all deadlines should be set and agreed on by the MNPWG members, taking all practical factors into consideration, however, the TRC can oversee and advise on this process.</p>
	<p>Article (3) (c)</p>	<p>We suggest rephrasing this clause as follows:</p>	<p>We agree, the TRC can oversee on any “reported” technical or procedural issue</p>

	The TRC will continue to maintain oversight over any procedural or technical issues and disputes that may arise.	The TRC will continue to oversee in good faith any procedural or technical issues and disputes as they are reported or filed.	
	Article (3) (d) Each mobile operator shall ensure its own network readiness for implementing Mobile Number Portability.	This clause should not be under the sec on “Rules and Involvement of the TRC”. However, 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 support these comments and agree that the readiness of any network is of crucial importance to the success of the MNP. The operators’ networks have in any given time many projects that are ongoing or are in the pipeline, waiting for technical/financial and/or contractual preparations and arrangements, these projects have their own different timelines and deadlines, therefore we agree that each operator needs to convey and confirm to TRC the expected network deadlines to align the MNP timeline with.
12	Article (4) 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 MNPSG 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.	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.	This contradicts with the MNPWG/SG Terms of Reference. the TRC role should not exceed overseeing the implementation of MNP, however, we agree that TRC should re-establish the industry forum, which has distinctive roles other than that of the MNPWG. In case the TRC consider the MNPCWG a replacement for the industry forum then the working group should tackle all issues outstanding since the last industry forum and decide/agree on them, including technical/commercial and financial ones.

		<p>The Industry Forum is intended to agree and decide prior to implementation, to facilitate discussion and formula on of recommendations. Subsequently, the MNPWG is established to execute and oversee the implementation of the outcomes determined by the Industry Forum.</p> <p>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:</p> <ul style="list-style-type: none"> • Technical specs. • Testing scenarios. • Policy recommendations. 	
	<p>Article (5) (a)</p> <p>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>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, 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>	<p>This is Not in line with international best practice, there must be fees imposed on the porting customer to allow the operators to recover the setup fees and the post launch costs.</p> <p>Therefore, we agree with Orange comment that a porting fee must be set and approved to allow operators to recover part of their operational cost.</p>
	<p>Article (5) (b)</p> <p>All mobile operators shall share in the costs</p>	<p>Orange believes that mobile users should share the cost of MNPC setup, operation, and</p>	<p>We agree that porting customers should bear their part of the cost by paying porting and routing fees.</p>

	of the MNPC set-up and operation and additional traffic conveyance.	additional traffic (by paying the porting fee) conveyance as stated in 2005 instructions previously. Also, please refer to our general comments point #2.	However, to ensure fairness and prevent excessive financial burdens on certain operators and since MNPC is a shared infrastructure which multiple operators use. There is a risk that some operators contribute to the cost of the MNPC while they get little or no benefit. Building-Administrative-Transfer ("BAT") approach mitigates this by allocating the cost based on usage of the system.
	Article (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.	-
	Article (6) The operators shall consider an approach to reduce the Tariff Transparency problem for mobile customers.	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.	We agree that Tariff Transparency is crucial, and we request to have this issue agreed on withing MNPWG/SG meetings and not mentioned in the instructions. Within this context, we believe that the use of audible tone before making an offnet call should be mandated. The termination rates in Jordan are not bill-and-keep, operators charge each other for offnet calls, and the rates are passed on to the customers.
	Article (7) Mobile Number Portability Clearinghouse (MNPC)	Please refer to our general comments point #9.	-
	Article (7) The Mobile Portability Service will be centrally managed by a third party that	Operators shall agree on a cost-sharing mechanism with the NPC provider for the operation considering the benefits for each	We kindly refer to our comment on article 5/b regarding the cost of the NPC, the cost of which is not defined or determined yet, since

	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.	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 didn't bring the principle of the "BAT" for the NPC tender process, then the high cost of this NPC and the subsequent allocation of the cost on the operators can be of a big issue to the MNP project implementation, the inability of allocating the required budget in general or in the required time due to certain constraints at the operators side should be taking at extreme importance by the TRC and discussed in advance of any setting of deadlines, we encourage TRC to give this issue the urgency it needs at the earliest.
	Article (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.	The cases where ACQ isn't applicable should be highlighted, such as the terminated calls from non-Jordanian numbers, international calls, terminating international numbers, non-telecom services that need routing lookup to send the request to the operator that has MSISDN ported in. Therefore, this article need to re-phrased to include such cases roaming services. The direct operator's billing and payments mechanism should be addressed as well, the current situation is that these requests are sent to MSISDN range holder
	Article (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	Please refer to our general comments point #8.	We agree, the Operators shouldn't be forced to automate the cycle. As there will be some non-automated activities such as ID verification of the ported number.

	defined validation, deactivation and activation activities once the initial porting request is submitted to the central number portability clearinghouse by the recipient operator.		
	<p>Article (9) (a)</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 consider and approve recommendations received from the MNPWG but only the TRC will be the final decision-making authority.</p>	<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: 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>	<p>MNPWG serves the role of determining the technical solution to be implemented, although the TRC can oversee and monitor MNPWG operation, the decisions of the MNPWG are taken by voting and should be final.</p>
	<p>Article (9) (b)</p> <p>The mobile operator that commits a fraudulent port Must also be liable to any and all damages/compensations arise from this fraudulent porting.</p>	<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. In addition, there should be a clear definition for "Fraud".</p>	<p>We agree that TRC should be more specific in terms of actions considered as fraud and the mechanism that TRC will follow to detect such actions and whether the action is committed by mistake or otherwise.</p> <p>Therefore, the mobile operator that intentionally commits a fraudulent port Must also be liable to any and all damages/compensations arise from this fraudulent porting.</p>

	<p>Article (9) (c)</p> <p>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>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.</p> <p>“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</p> <p>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). • Non-matching identification, • Fraud risk, • Unresolved billing. 	<p>We agree with Orange comment that the referral to just “Barrier Free Porting” as is is risky, as there are certain precautions that must be taken care of and clearly addressed, discussed and agreed on in advance to ensure smooth porting, and the rejection criteria is valid.</p> <p>These controls should be available for individual porting as well as for corporate (if agreed on) porting.</p> <p>We also support Orange’s argument of rejection reasons that include: 1) Active managed service contract, 2) Ongoing payment dispute, 3) Number tied to critical infrastructure (e.g., ATMs, smart meters), 4) Non-matching identification, 5) Fraud risk, 6) Unresolved billing, 7) unfulfilled Contractual obligations.</p>
	<p>Article (9) (d)</p> <p>The Mobile Number Portability service will be governed by the provisions defined by 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</p>	<p>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</p> <p>Rules must cover:</p> <ul style="list-style-type: none"> • Delegated authority. • Hierarchical account ownership. • Transition timelines for critical services. 	<p>The draft instructions have clearly stated that TRC will approve MNPWG decisions, therefore, we believe that – since MNPWG decisions are made using a voting mechanism between the operators but excluding TRC, the TRC can accordingly approve such decisions in the sense that they are taken collectively and should be in the favor of all stakeholders.</p>

	ensure efficient and consumer centric porting experience.		
	<p>Article (10) (a)</p> <p>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.</p>	<p>Please refer to our general comments point #13.</p>	<p>The role of approving technical and operational approaches should be for MNPWG, which was found for this purpose. Having it approved by the TRC defeats the purpose of creating the MNPWG</p> <p>The draft instructions state clearly that TRC will approve MNPWG decisions, however, given the TRC is part of the MNPWG, and MNPWG decisions are taken by voting; we believe this is an adequate process for approving such decisions, no need for further approvals.</p>
	<p>Article (10) (b)</p> <p>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</p>	<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. Furthermore, the penalty for not meeting milestones could be unfair if delays result for reasons that are out of the operator's control.</p>	<p>The MNP project –although discussed earlier– but its financials were not planned, nor allocated, and in all cases not defined yet, including NPC setup and running costs and the operators' networks changes and modifications to adopt for MNP.</p> <p>Given the above, the 12 months period isn't a realistic deadline, and is not in line with international benchmarks, especially that operators have other projects in the pipeline that have impact on MNP and its resources, Zain -in addition to many ongoing upgrade and swap projects in core and other network systems- is in the process of upgrading its Charging and billing system, with timeline which extends until 2028, the MNP provisions shall be adopted by the new system after that date.</p>

	Regulation.		In all cases, the timeline shouldn't be part of the instructions, it should be agreed on within MNPWG meetings.
	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 agree with Orange
	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 Orange, the MNP regulation should have specific conditions for compliance with Personal Data Protection Law.
	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.	Agree with orange, MNP regulation should include conditions that protect operators against fraudulent transactions by other parties, including compensation mechanism.

	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: Donor Operator may verify ownership to prevent fraud. prior to deactivation.	Agree with Orange, we request that donor operator Must have the right to verify line ownership prior to deactivation.
	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.	-

Zain Response on Umniah on MNP Draft Instructions

Umniah began its comments by describing the implementation of MNP as the removal of a key barrier to competition. This is misleading, given the already intense competition in the mobile market. This is supported by the TRC's latest Mobile Market Review in 2020, which concluded that wholesale MACO market is not susceptible to ex ante competition due to the existing competitive conditions.

	Article	Umniah Comment	Zain Comment
	Article (1) Definitions	<p>The current definition of "Operator" is limited to mobile service providers, excluding other licensed entities such as fixed-line operators. However, these licensees also originate and terminate calls to mobile numbers and are therefore directly involved in the routing of traffic to ported numbers. 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.</p> <p>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.</p>	<p>1/c) The term "engaged" does not clearly define the relationship between the operators and the MNPC</p> <p>1/e) It should be clearly stated that the cost is borne by the Recipient Operator, not the Doner Operator</p> <p>1/h) The definition of License must be inline with the definition in the Telecom Law</p> <p>1/K) Missing word (providing) communications services</p> <p>We agree that "Tariff Transparency" should be included in the Definitions</p>

		<p>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>Article (2)</p> <p>(a) Mobile Number Portability shall be Recipient Led requiring the recipient operator to manage the porting transaction on behalf of the mobile customer.</p> <p>(b) Customer porting request will be completed within 24 hours after the request is initiated by the recipient operator.</p> <p>(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 channel approved by the TRC to initiate their porting request.</p>	<p>Article (2) outlines the general porting process requirements but lacks clarity in two important areas:</p> <p>1. Clause (c): In line with Jordan's national digital transformation strategy and global best practices, enabling customers to submit porting requests digitally (e.g. via mobile apps, operator websites, or secure e-KYC platforms) is essential for improving customer experience, reducing porting time, and minimizing operational costs. Requiring physical store visits may create unnecessary barriers and limit consumer adoption of the MNP service.</p> <p>We recommend that Article (2)(c) be revised to explicitly include digital self-service channels as an acceptable method for initiating MNP requests, subject to TRC approval and security validation standards. Accordingly, we proposed revision to Article (2) (c) as below:</p> <p>"Customer requesting to use the Mobile Number Portability Service may initiate their porting request through a TRC- approved</p>	<p>We disagree with Umniah response to article 2 as follows</p> <p>1. The physical visit to the retail shop remains the main acceptable means of initiating a porting request. Allowing alternative channels such as online or remote requests may increase the risk of fake or wrongful porting, leading to serious complications.</p> <p>2. Zain believes that introducing online porting should not be considered at least at the early stage of MNP implementation, when the necessary safeguards, fraud prevention mechanisms, and security validation standards are fully in place. Any premature shift to online porting without addressing these risks could affect customer trust in the MNP process and create challenges for operators.</p> <p>3. Porting transaction data and KYC information should be forwarded to the Doner Operator as well.</p>

		channel, including but not limited to visiting a retail store or meeting a designated sales agent of the recipient operator, or using secure digital platforms to initiate porting request such as mobile apps or websites, in accordance with TRC guidelines".	<p>4. We therefore disagree with Umniah that the verification process is to be carried out by the porting customer</p> <p>5. The Recipient led option is still not agreed on by the MNPWG/MNPSC, we disagree with Umniah in that sense and request that Donor-led option be available for discussion as well.</p> <p>6. All SLA's should be agreed on by MNPWG/MNPSC. They shouldn't be states in the Instructions as they are not final yet.</p>
(d)	(e) 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>Clause (d): SMS-based validation: While the draft requires customers to send an SMS for validation (Article 2.d), this step is only applicable under Option 1a (Break Before Make - Remote Initiation) as per the draft MNPC RFP. It does not apply to Options 1b or 2, which are equally under evaluation by the TRC. This could lead to confusion or misalignment between the Instructions and the final porting model selected.</p> <p>We propose the following amendment: "Where applicable, the customer shall validate the ownership of the number(s) to be ported by sending an SMS to the MNPC or through other verification methods defined in the applicable porting model. The validation mechanism shall be aligned with the MNP process approved by the TRC, as detailed in the MNP Business Rules."</p>	<p>Zain does not agree with Umniah view on the SMS verification, we believe the SMS from the customer must not be the sole validation rule, and the Recipient operator's agent must check the customer documents and send the signed checkup form to donor operator to confirm the authenticity of the customer line to initiate proper porting process; In addition, all porting transaction data and KYC information must be forwarded to the Donor operator to confirm the authenticity of the line and support the proper initiation of the porting process,</p> <p>And without prejudice to our view above, the three options may require customers to validate by SMS whether it was PAC by SMS to NPC or inbound SMS to NPC.</p>
		3. Scope of subscriptions: The draft does not explicitly define the types of mobile	We disagree with Umniah comment, since as per the definition of Mobile Number Portability

		<p>subscriptions covered (Standard Mobile voice/data services), which is essential for proper implementation and enforcement.</p> <p>We propose the following amendment:</p> <p>"These Instructions apply to all standard mobile (Voice/Data) subscriptions, subject to the scope defined in the TRC's MNP Business Rules."</p>	<p>(MNP), the portability is specifically refers to the ability of mobile customers to retain their <u>mobile numbers</u> when switching service providers. MNP does not apply to data-only SIMs, and therefore including data lines under its scope is inconsistent with the MNP framework.</p>
	<p>Article (3)</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>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 are not in line with Umniah call for further enforcement rule to the TRC in the course of MNP implementation, given that the MNP core step relies on a contractual agreement between the operators and the MNP clearing house winning vendor, such a contract arrangement should have all the necessary provisions to ensure smooth and obstacle free course of action.</p> <p>Umniah mentioned that the role of the TRC is coordinating and overseeing the implementation of MNP. Accordingly, the role of choosing a technological and operational solution should be solely done by the operators themselves who specifically know about the requirements, workflows, and performance expectations of their own system.</p> <p>In addition, the role of MNPWG\SG also includes cost allocation and recovery, agree on SLA time frames, agree on final business rules, etc.</p>
	<p>Article (3) (b)</p> <p>The TRC will oversee the deployment of mobile portability</p>		<p>This should be carried out in collaboration with all stakeholders.</p>

	by establishing reasonable deadlines for implementation.		all deadlines should be set and agreed on by the MNPWG members, taking all practical factors into consideration, however, the TRC can oversee and advise on this process.
	(d) each mobile operator shall ensure its own network readiness for implementing Mobile Number Portability	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: "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 are not in line with how Umniah address issues of network readiness, and how they see the role of the TRC in the implementation phase, The readiness of any network is of crucial importance to the success of the MNP. The operators' networks have in any given time many projects that are ongoing or are in the pipeline, waiting for technical/financial and/or contractual preparations and arrangements, these projects have their own different timelines and deadlines, therefore we agree that each operator needs to convey and confirm to TRC the expected network deadlines to align the MNP timeline with
	Article (4) 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 MNPSG will oversee and provide executive	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. 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	We disagree with Umniah comment, we believe the TRC role should not exceed overseeing the implementation of MNP. However, the article contradicts with the MNPWG/SG Terms of Reference. The TRC role should not exceed overseeing the implementation of MNP, however, the TRC should re-establish the industry forum, which has distinctive roles other than that of the MNPWG. In case the TRC consider the MNPCWG a replacement for the industry forum then the working group should tackle all issues

	<p>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>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. We kindly suggest adding the following clause: "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>outstanding since the last industry forum and decide/agree on them, including technical/commercial and financial ones. We also refer to an important point when consensus of the MNPWG is not reached, the MNPSC should then intervene and decide accordingly. In all cases we believe the TRC a decisive role in MNPWG non-consensus cases is not required or at least early in the sense that the MNPSC is available and can perform its duties in this regard.</p>
	<p>Article (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>	<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> <ol style="list-style-type: none"> 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. 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 MNPSC costs, and per-port operational charges. 	<ol style="list-style-type: none"> 1. we don't agree with Umniah's comment that set-up and operational costs should be shared equally among all mobile operators. To ensure fairness and prevent excessive financial burdens on certain operators and since MNPSC is a shared infrastructure which multiple operators use. There is a risk that some operators contribute to the cost of the MNPSC while they get little or no benefit. Building-Administrative-Transfer ("BAT") approach mitigates this by allocating the cost based on usage of the system. 2. we also don't agree with Umniah's comment that no per-port fee should be imposed on the Recipient Operator to Donor Operator is not in line with the best international practices which recommend that the customer bear the cost of porting, to allow the operators to recover the

		<p>We suggest the following clarifications and additions to ensure a fair and transparent cost framework:</p> <ol style="list-style-type: none"> 1. Each operator should bear its own internal and incremental conveyance costs, such as database queries and routing upgrades. 2. The MNPC set-up and operational costs should be shared equally among all mobile operators, unless otherwise determined by the TRC. 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. 4. Clarify that no additional routing charges should be passed between operators or to subscribers. 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>setup fees and the post launch costs. The fees charged to customers should be adequate to ensure the system is self-sustaining and able to cover its operating and setup costs.</p> <p>3. We understand from Umniah's request that they're requesting access to the MNPC considering it as the central routing database. However, the MNPC doesn't handle calls during call initiation. Meaning calls do not pass through the MNPC.</p>
	<p>Article (6) The operators shall consider an approach to reduce the Tariff Transparency problem for mobile customers.</p>	<p>We believe that the approach to tariff transparency should be unified across all operators to ensure consistency in how information is presented to customers and to avoid confusion resulting from the use of different methods by each operator. We therefore suggest that the tariff transparency mechanism be defined collectively by all operators through the Mobile Number Portability Business Rules and be subject to TRC review and approval</p>	<p>Tariff Transparency is crucial, and we request to have this issue agreed on withing MNPWG/SG meetings and not mentioned in the instructions. However, we agree with Umniah that the tariff transparency approach should be unified across all operators. It is important to use an audible tone before initiating an off-net call, as a means of notifying the customer. Since termination rates in Jordan are not based on a bill-and-keep model, where operators charge each other for off-net calls and these costs are passed on to the</p>

			customers, it is important to protect the customer's right to be informed. The customer must be clearly alerted that the call will incur additional charges
	<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. 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>In reference to the establishing an NPC by a third party, we kindly refer to the issue of the cost of the NPC, the cost of which is not defined or determined yet, since the TRC didn't bring the principle of the "BAT" for the NPC tender process, then the high cost of this NPC and the subsequent allocation of the cost on the operators can be of a big issue to the MNP project implementation, the inability of allocating the required budget in general or in the required time due to certain constraints at the operators side should be taking at extreme importance by the TRC and discussed in advance of any setting of deadlines, we encourage TRC to give this issue the urgency it needs at the earliest.</p> <p>As for accessing the NPC database although it should be available to all MNP-concerned operators, but we believe the MNPWG should discuss such issues and decide accordingly.</p> <p>2- the MNPC doesn't handle calls during call initiation. The local DB for each operator is being updated every port in/ port out, so at time of the call, each network will check internally with the local DB in order route the call.</p>

	<p>Article (8)</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-ported numbers. All 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 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.</p>	<p>Article (8) appropriately mandates All Call Query (ACQ) direct routing for mobile operators; however, it does not explicitly extend this obligation 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. 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): "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>We don't agree with Umniah's suggestion regarding the ACQ, we recommend instead that it should be handled by the MNPWG at the earliest.</p> <p>The cases where ACQ isn't applicable should be highlighted, such as the terminated calls from non-Jordanian numbers, international calls, roaming calls, therefore this article need to re-phrased to include such cases roaming services. We also suggest that direct operator's billing and payments mechanism should be addressed as well, the current situation is that these requests are sent to MSISDN range holder</p> <p>In regard to the automation of activities, we believe that not all activities can be automated, such as ID verification process. Therefore, the article should be more flexible and not to mandate a fully automated process.</p>
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<p>Article (9) (a)</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 consider and approve recommendations received from the MNPWG but only the TRC will be the final decision-making authority</p> <p>b) The mobile operator that commits a fraudulent port Must also be liable to any and all damages/compensations arise from this fraudulent porting.</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 provisions defined by the Mobile</p>		<p>The MNPWG serves the role of determining the technical solution to be implemented</p> <p>The mechanism of detecting fraudulent porting should be clear.</p> <p>The TRC should be more specific in terms of actions considered as fraud and the mechanism that TRC will follow to detect such actions and whether the action is committed by mistake or otherwise.</p> <p>Therefore, the mobile operator that intentionally commits a fraudulent port Must also be liable to any and all damages/compensations arise from this fraudulent porting.</p> <p>Additionally, the referral to just “Barrier Free Porting” as is risky, as there are certain precautions that must be taken care of and clearly addressed, discussed and agreed on in advance to ensure smooth porting, and the rejection criteria is valid. These controls should be available for individual porting as well as for corporate (if agreed on) porting.</p> <p>The rejection reasons include: 1) Active managed service contract, 2) Ongoing payment dispute, 3) Number tied to critical infrastructure (e.g., ATMs, smart meters), 4) Non-matching identification, 5) Fraud risk, 6) Unresolved billing, 7) un fulfilled Contractual obligations.</p> <p>Finally, as the draft instructions has clearly stated that TRC will approve MNPWG decisions, therefore, we believe that – since MNPWG decisions are made using a voting mechanism</p>
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	<p>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 efficient and consumer centric porting experience.</p>		<p>between the operators but excluding TRC, the TRC can accordingly approve such decisions in the sense that they are taken collectively and should be in the favor of all stakeholders.</p>
	<p>Article (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.</p> <p>(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</p>	<p>While Article (10) sets a clear implementation timeline and enforcement mechanism, further clarification is recommended in two key areas: the role of the MNPWG/SG and the process for resolving disputes that may arise during implementation.</p> <p>We fully support the collaborative role of the MNP Working Group/Steering Group (MNPWG/SG) in coordinating the technical and operational aspects of MNP. However, it is important to reaffirm that this group functions in an advisory and facilitative capacity, and that the TRC retains the ultimate regulatory authority and decision-making power. Additionally, the draft does not currently outline a structured dispute resolution mechanism to address potential disagreements between stakeholders (e.g., between operators or between an operator and the MNPC provider).</p>	<p>We do not agree with Umniah's comment regarding the role the technical, operational approaches and the business rules, as they should be studied by the MNPWG and cannot be approved by the TRC. Having it approved by the TRC defeats the purpose of creating the MNPWG.</p> <p>And it is very important here to focus on the implementation plan, this project was not pre-planned and was only introduced in December 2024, after the budget for the upcoming year had already been finalized with no amounts allocated for this project. Planning to implement the project after 12 months implies that the network setup should take place in 2025, and as previously mentioned, no amounts have been allocated in the budget.</p>

	<p>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.</p>	<p>Without a formal process, such disputes could cause delays and uncertainty.</p> <p>1. Clarify the advisory role of the MNPWG/SG and reinforce that any outputs from the group are subject to TRC approval.</p> <p>Suggested clause:</p> <p>"The MNPWG/SG shall make every effort to reach consensus on technical and procedural matters and submit its recommendations to the TRC. However, all final decisions shall rest with the TRC. In cases where consensus cannot be reached</p>	<p>In addition, the operators have other projects in the pipeline, including the swap of billing and charging systems which are planned to be completed after 2 to 3 years from now. and the introduction of MNP project within the preset time plan of 2025 is not possible.</p> <p>Therefore, the 12 months implementation plan is not realistic.</p> <p>In all cases the timeline shouldn't be part of the instructions, it should be agreed on within MNPWG meetings</p> <p>The role of approving technical and operational approaches should be for MNPWG, which was found for this purpose. Having it approved by the TRC defeats the purpose of creating the MNPWG</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</p>	<p>We don't agree with Umniah call for a TRC role in decision making post to MNP implementation.</p> <p>Taking into consideration that processes to generate and finalize all MNP documents including the Instructions, RFB and Business Rules are going through consultation process that include working groups responsible for determining all technical and commercial aspects of the MNP, all operators are involved in these processes and the TRC's role is to oversee and ensure smooth course of actions,</p> <p>Given the above, Umniah calls to override all the above arrangements that led (or in the</p>

	<p>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. 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</p>	<p>process of leading) to a successful MNP project is not understood nor is acceptable.</p> <p>To ensure the MNP post implementation is going ok, we recommend that the MNPWG is made available and all stakeholders be consulted for any action to be taken then.</p>
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