

Orange Mobile's comments on Umniah's comments on the draft "Instructions for Implementing Mobile Number Portability in Jordan"

Orange Mobile would like to thank TRC and express its appreciation for providing the opportunity to share our feedback and comments on 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. 6/19/25/22/3133 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
<p>Article (1) Definitions The expressions, phrases and acronyms used in these instructions shall have the following meanings.</p> <p>a) Mobile Number Portability (MNP): the ability of mobile customers to retain their mobile numbers when changing the mobile network operator.</p> <p>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.</p> <p>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.</p> <p>d) Donor Operator - is the operator to whom the mobile number belongs at the time the subscriber makes a request for porting.</p> <p>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> <p>f) Mobile Number Portability Administration Rules (MNP Business Rules) - the document that defines the rules and conditions that apply</p>	<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.</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. 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 fixed operators should not bear any costs in MNP.</p> <p>Moreover, each originating network including fixed operators shall, when technically feasible 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</p>

<p>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>MNP, while for ACQ, accessing the MNP per call shall be to the local MNP database copy and not to the centralized.</p> <p>In regards to Umniah's comment on "tariff Transparency", Orange would like to kindly emphasize what was mentioned in its response on the instructions 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.</p> <p>Based on common deployment practices in industry, real time notification to calling party during a mobile originated call is not adopted in several international and regional deployments. However, if decided by TRC and MNPWG to apply notification to calling party of an offnet destination, it should be subject to technical feasibility at each originator operator and shall not be mandated. This would not eliminate the need (subject to TRC approval) to have a public internet access to centralized MNP for inquiring on porting status of any MSISDN line.</p>
<p>Article (2) Requirements of the Mobile Number Portability service</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>d) The Mobile Number Portability Service in Jordan will require the customer to validate the ownership of the number(s) to be ported and confirmation to progress with the porting transaction by sending a free of charge SMS to the MNPC.</p>	<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. 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.</p> <p>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 channel, including but not limited to visiting a</p>	<p>Orange believes that the determination of the appropriate processes should be left to the operator, in line with their internal operations and systems. Accordingly, Orange stresses on its position to rephrase the clause as follows:</p> <p>"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."</p> <p>However, and due to the reasons mentioned in Orange response on the instructions, operators shall be able to follow any internal process that is admitted to facilitate the MNP process especially for corporate accounts. Also, Orange suggests to clearly state official digital channels as one of the options.</p>

	<p>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> <p>2. 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 MNP 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 MNP 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>3. Scope of subscriptions: The draft does not explicitly define the types of mobile subscriptions covered (Standard Mobile voice/data services), which is essential for proper implementation and enforcement.</p> <p>We propose the following amendment: “These Instructions apply to all standard mobile (Voice/Data) subscriptions, subject to the scope defined in the TRC’s MNP Business Rules.”</p>	<p>in addition, while digital means may be a possible means, they should not be mandatory for the reasons we outlined in our previous comments. This is due to the legal infrastructure, which imposes a legal reality that does not support electronic transactions and agreements in a way that allows this procedure to be carried out safely. This is particularly true in matters related to post-payment services, which involve legal sensitivity and financial consequences and require the provision of reliable and legally approved electronic documents.</p> <p>In regard to Umniah comment on article 2 (d), Orange kindly stresses on its position mentioned in our response on the instructions and does not agree with Umniah that the options are being equally evaluated. For both deployment scenarios in the RFP Break before Make and Make before Break (knowing that Orange is stressing to apply the Break before Make and should have the focus so to align with regulatory requirements clearly stated in several occasions), verification SMS shall be possible to be sent by subscriber requesting porting since it is in the very early phase of porting request qualification</p> <p>However, and in regard to the verification, Orange would like kindly to emphasize its response on this article and accordingly suggests rephrasing the article to become as follows:</p> <p>“The Mobile Number Portability Service in Jordan will require the customer to validate the ownership of the number to be ported and confirmed to progress with the porting transaction by appropriate means as decided by the operator, and in compliance with the relevant laws.”</p> <p>In regard to Umniah comment on the scope of subscription, Orange does not agree with Umniah as the proposed amendment would increase complexity to the instructions.</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</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</p>	<p>In regard to Umniah’s comment on article 3, and while Orange appreciates the importance of providing</p>

<p>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>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>Clause (d) assigns responsibility to operators, not to the TRC.</p> <p>Therefore, we believe its placement under an article titled “Role and Involvement of the TRC” is not entirely appropriate.</p> <p>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”.</p>	<p>guidance to ensure timely progress of the project. It is important to recognize that the technical and operational environments differ significantly across operators. As such, issuing binding directions without a case-specific justification may not be practical or appropriate. We believe that any necessary measures should be tailored to the circumstances of each network to ensure feasibility and effectiveness. Accordingly, Orange stresses on its suggestions on article 3 that were communicated in its response on the instructions.</p> <p>in addition, 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>In regard to Umniah’s comment on article 3 (d), Orange agrees with Umniah that this clause should not be under the section “Rules and Involvement of the TRC” but does not agree with Umniah’s suggested modification, 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. Accordingly, Orange suggests rephrasing this clause as follows:</p> <p>“Each mobile operator shall confirm its own network expected date of readiness and its readiness for implementing Mobile Number Portability.”</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 approach is to promote transparency, set clear and measurable obligations, and apply a fair and gradual regulatory framework.</p>
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<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 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.</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.</p> <p>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: "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 and kindly stresses on its comment on the same article that was raised in our response on the instructions. 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>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>Orange strongly disagrees with Umniah's comment on article 5. Cost-sharing must be proportionate to the benefit derived by each operator. Orange kindly emphasizes its opinion communicated in our response on the instructions regarding the cost. Also, Orange stresses that the operator who would not benefit from the porting process should be compensated for any cost incurred for operation, routing, etc.</p> <p>On the other hand, and 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>Orange would like also to stress that updating centralized MNP shall be exclusively from MNP donor and recipient operators and not to the MNP database directly but over the workflow with centralized MNP database which has to update its backend MNP database after.</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>Therefore, Orange would like kindly to 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 indirect costs or damages it incurs as a result of participating in the MNP operations. <p>Regarding the cost that is incurred by the operator to compensate operational and routing costs, Orange believes that the operator has the right to set porting fee, that its amount is not only limited to cover the cost, but also to make sure customers value the service and are genuine when they decide to go for porting. Moreover, Recipient Operator to pay a fee to the Donor operator for each successful port, this cost is usually passed on to the subscriber.</p> <p>However, Orange kindly stresses on its position regarding the cost mentioned in our response on the instructions, and on the fact that cost would cause a significant financial burden.</p> <p>Orange also believes that details and mechanism related to costing shall be discussed and agreed between the MNPWG.</p>
<p>Article (6) Tariff Transparency 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.</p> <p>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>Orange would like kindly to emphasize 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.</p> <p>Based on common deployment practices in industry, real time notification to calling party during a mobile originated call is not adopted in several international and regional deployments. However, if decided by TRC and MNPWG to apply notification to calling party of an offnet destination, it should be subject to technical feasibility at each originator operator and shall not be mandated. This would not eliminate the need (subject to</p>

		TRC approval) to have a public internet access to centralized MNP for inquiring on porting status of any MSISDN line
<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 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>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.</p> <p>We respectfully suggest revising the article to explicitly include all</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>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>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 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>In regard to the role of the MNPWG, Orange kindly stresses on its position mentioned in its response on the instructions. Also, Orange stresses on its position mentioned in this response.</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 (10) Implementation Plan</p> <p>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</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</p>	<p>Orange kindly disagrees with Umnaih that the Role of MNPWG/SG is an advisory and facilitative capacity only, since as per MNPWG/SG Terms of Reference (ToR) the</p>

<p>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.</p>	<p>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.</p> <p>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). 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: “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 within the group, the TRC shall determine the appropriate course of action to maintain the implementation timeline.”</p> <p>2. Introduce a formal dispute resolution clause within the Instructions to ensure timely resolution of issues.</p> <p>Suggested clause: “Should the operators, through the MNPWG/SG, be unable to reach agreement on any matter related to the implementation of MNP, or should a dispute arise between any two or more stakeholders including between an operator and the MNPC provider, the matter shall be referred to the TRC for resolution.</p> <p>The TRC shall have the authority to issue binding directions or decisions, which shall be final and enforceable by all parties.”</p>	<p>role of these groups is to decide on MNP related matters according to the voting mechanism.</p> <p>Regarding the dispute resolution, Orange suggests adding a new Article (xx) as below suggested text:</p> <p>In the event of any dispute, disagreement, or claim arising between the Licensed Operators themselves, or between any Licensed Operator(s) and the Clearing House Operator and/or any other entity that might be involved in relation with MNP, relating to the interpretation, implementation, performance, or any other matter associated with the Mobile Number Portability (MNP), including but not limited to technical, procedural, operational, or commercial aspects, the following dispute resolution mechanism shall apply:</p> <ol style="list-style-type: none"> 1. Good Faith Negotiation: The parties to the dispute shall first engage in good faith negotiations for a period not exceeding five (5) working days from the date the dispute is formally raised in writing. 2. Fast-Track Mediation by TRC: If the dispute remains unresolved, it shall be referred immediately to the Telecommunications Regulatory Commission (TRC), which shall act as a neutral mediator under a fast-track mediation process. 3. Mediation Procedure: <ul style="list-style-type: none"> ○ TRC shall facilitate and oversee the mediation within ten (10) working days from the date of referral. ○ The parties shall submit all relevant documents and
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		<p>information required for TRC to assess the matter.</p> <ul style="list-style-type: none"> ○ TRC may request meetings, written responses, or technical clarifications as deemed necessary. ○ The mediation outcome shall be recorded in writing and shared with all parties. <p>4. Binding Recommendation: If no amicable resolution is reached within the mediation period, TRC shall issue a non-binding recommendation. Should the parties reject the recommendation, they may proceed to other legal remedies in accordance with the applicable laws and license conditions.</p> <p>5. Continued Performance: Pending final resolution of the dispute, all parties shall continue to perform their obligations under the MNP Instructions in good faith and without disruption.</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. Flexibility is essential to ensure that the TRC can respond to evolving market needs, refining porting procedures,</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>

	<p>addressing unforeseen challenges, or adjusting cost-sharing and service level frameworks.</p> <p>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>	
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