

Your response

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Question 3.1: Do you have futher views about the implementation of STIR?	[Name Withheld] is not confident that STIR or any other common database will reduce CLI spoofing or scam calls as a trusted CLI could still be usurped. It may also bring complexity between transit operators as not all telco are interconnected with each-others
Question 3.2: Are there any other approaches we should consider for addressing CLI authentication?	[Name Withheld] is still investigating this with its vendor providing telco equipment's.
Question 3.3: Do you agree a common database would be required to support the implementation of STIR?	[Name Withheld] has not enough elements in hands to answer to this question at this stage.
Question 3.4: What are your views on using blockchain technology as the basis for a common numbering database to support CLI authentication? What other solutions do you think should be considered and why?	[Name Withheld] has not enough elements in hands to answer to this question at this stage
Question 3.5: What are your views on timeframes?	[Name Withheld] think that a server dedicated to Portability could be installed & set in service much more in advance compared to the announced timeframe.
Question 4.1: What are your views on the current implementation of number portability in the fixed and mobile sectors?	 [Name Withheld] confirms today's UK situation with below elements: Each company which is willing to perform portability must negotiate & sign an individual portability agreement for both Geo & Non-Geo to be done per registered electronic communications provider. This process is painful & impeaches portability transactions. Even today, while UK was one of the first countries to introduce Number Portability, a Service Establishment procedure remains regional for legacy telco. We still have today a clear difficulty to identify the right telco owner to whom

we need to raise portability request due to possible Service Providers having authorization but delegating operations of their numbers to another electronic communications provider. Most of the time, losing telco does not respect "normal" delay to accept & process portability request in due time. In the current process, there is also a strong lack of transparency for rejection, post-pone, Most of our porting remains complex & requires a conference call with the losing or gaining carrier based on portability request. Question 4.2: What are your views on sharing [Name Withheld] and [Name Withheld] acting the functionality of a common numbering as local operator or registered electronic database for CLI authentication to also communication provider in several countries support improvements in UK porting around the world think that CLI authentication processes? has to be handled separately for the moment. We do not think that the CLI authentication must be connected on the same platform as the one for Number Portability. Question 4.3: We are currently supporting a Today, we are interested to analyse possible blockchain pilot. Do you have any views on solution but we do not have yet deployed such using this technology for port transactions and type of technology for that purpose. a routing database? Are there other In regard of Number Portability, we think that alternatives that should be considered? OFCOM should enforce the deployment of a central solution with related server where all concerned carriers will be connected to. It will at least solve all pains we are having for number portability. Deployment of such block chain technology is Question 4.4: What are your views on implementation timeframes and the not linked to IP transformation. [Name importance of a common database solution Withheld] & [Name Withheld] has started their being available to support the migration of IP transformation several years ago & it will be telephony services to IP? closed in the coming months. We consider that there is no direct link between number portability, CLI authentication & IP transformation. Question 5.1: What are your views on the Since the introduction of the number potential for a common database solution to management online service, we have seen a also provide shared functionality to support real progress to reserve & allocate number

number management?	block. Today, [Name Withheld] is satisfied with the current process & delay which has been drastically reduced.
Question 5.2: What do you see as the benefits or disbenefits of changes to number management post PSTN retirement?	As stated before, [Name Withheld] do not see dependencies between the deployment of a new numbering management platform and the PSTN retirement / migration to full IP.
Question 6.1: Do you agree, in principle, with the need to develop and adopt a common numbering database? If not, why not?	Before validating such type of initiative, and the deployment of a single common numbering database, [Name Withheld] would like to get further insights in terms of the proposed technology, and have some visibility from countries who introduced the block chain technology. [Name Withheld] being a small telecom operator vs. other domestic ones would like to get some insurance on the way the required investments will be shared between each contributor. We expect these investments to be proportional to the size of each telecom operator
Question 6.2: If you do not agree with the need to develop and adopt a common numbering database, do you have any suggestions on how the issues we have set out in this consultation could be addressed?	[Name Withheld] would like to have a taskforce managed by OFCOM where all telco could participate actively & exchange their points of view. We would like also to analyze more deeply, the possible technical & financial impact of deploying a new common numbering management tool.
Question 6.3: Do you agree that in the first instance industry should lead the implementation of a common numbering database, with Ofcom providing support to convene and coordinate key activities? If not, what are your views on how implementation should be taken forward?	[Name Withheld] agrees having the industry to lead the implementation of a common numbering database that would be first dedicated the number portability. We could analyse afterwards & without commitment the ability to extend the common database with additional facilities, such as CLI authentication.