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Online Submission

10 March 2017

Dear Ms Rosso

Review of the General Conditions of Entitlement 2017

We welcome the opportunity to comment on this review and have focussed our attention on question 19, relating to General Condition 18. We are disappointed to note in 11.48 that Ofcom continues to be reluctant to modify GC18 and that you believe the onus should continue to remain on industry to reach consensus.

Over the last ten years or so, key organisations within the industry have met on a regular basis through OTA forums and other industry initiatives however the fundamental areas that cause problems for number portability remain unchanged. This undoubtedly demonstrates that industry cannot resolve the issues in isolation.

It is our belief that the majority of organisations are in general agreement with steps needed to bring about improvement but without some regulatory back up it is impossible to ensure industry wide commitment. In this consultation you say that you welcome detailed proposals on particular improvements and I can confirm that we are currently working with the OTA Porting Steering Group to finalise a proposal for this purpose, however Magrathea's key issues – that could be addressed during this review of GC18 – are as follows:

- 1) Service Establishment – Clarify in GC18 the requirement to complete service establishment within a defined period on request as well as which party is responsible (Range holder or Host network), with appropriate follow up for non-compliance complaints. *This would ensure that most numbers are portable within a reasonable timescale.*
- 2) Order handling – Clarify in GC18 the requirement to adhere to industry agreed process (or potentially a new code of practice document) with penalties for non-compliance. *This would result in a better consumer experience and a reduced burden on CPs handling the process.*

- 3) Call Routing – Clarify in an industry agreed process or GC18 the requirement to provide 24/7 fault handling for ported number faults (even if just for the incumbent to start with). *This would result in a better consumer experience and reduce brand damage for gaining CPs impacted by faults they cannot control.*

It is our opinion that a proper review of GC18 at this stage would make considerable inroads into the problem area that is number portability and whilst Ofcom may view this as additional regulatory burden we consider it entirely proportionate when you take into consideration the level of consumer harm experienced on a daily basis.

Yours sincerely



Tracey Wright
Magrathea