Title:

Mr

Forename:

Patrick

Surname:

Van Der Zwan

Representing:

Organisation

Organisation (if applicable):

Porting Acces B.V

Email:

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1: Do you agree that current mobile switching processes impair the consumer switching experience through increased switching costs, coordination difficulties, loss of service, uncertainty of porting status or risks of unwanted save activity? What benefits do current processes deliver which would be difficult to achieve through alternative processes?:

Agree. Losing Provider Led Process has multiple disadvantages viewed from a consumer point-of-view. World-wide best practice and blueprint NP proces is Recipient-led, with one-stop-shopping to facilitate the consumer.

Consumer friendly trasaction process, short and simple. No Donor frustration in the porting process. Smooth and fast transaction, without loss of service.

PortingXS does not think that are benefits of the current system that could be difficult to achieve through the alternative processes.

Question 2: What advantages and disadvantages could GPL switching processes offer, compared to current mobile switching processes? In particular, how important is it to make it easier for consumers to switch without being required to speak to their current provider?:

GPL switching processes will result in a more effective, consumer friendly porting experience. To enhance competition maximally, the consumer should feel absolutely free to make a choice concerning telco provider. If the consumer decides to switch, the porting process should not allow the Leaving operator to persuade the consumer to stay. In doing so, the current system promotes Winback. Which in the end hsa a negative impact on porting volumes.

Next to a GPL process, we also stress the importance of Make-Before-Break. If the recipient is only allowed to be activated once the donor has sent the deactivate message, in a way the Donor can influence negatively the customer journey.

The disadvantage of introducing the GPL proces are the switching costs. Not every telco operator will have a business case in NP. Changing current processes will have costs and will thus lead to resistance.

Question 3: To what extent do you think the two options we have identified address the drawbacks with current processes we initially identified? Are there other options we should consider?:

Option 1: Simplifying the process for obtaining PAC
We feel that simplifying the process for obtaining PAC will mostly adres "Consumer difficulty and unnecesarry switching costs". Other dwarbacks will possibly still remain.

Option 2: Gaining provider led process
We feel that the GPL process will adress most of the drawbacks identified. GPL is worldwide best practise and proven process.

Another option that OFCOM should consider is the introduction of "Make-Before-Break". The customer will first be activated on the GP, and then be deactivated from the LP network. In doing so, the customer does'nt experience loss-of-service.

Question 4: What mechanisms could these processes use to ensure that consumers are adequately verified, and protected from being switched without their consent or knowledge? What mechanisms could be employed for ensuring that consumers are adequately informed about the implications of their decision to switch? :

Building upon worldwide best-practice, there a number of mechanisms that should be taken into account:

1. Customer intake procedures at GP
-Customer validation in the shop.
-Information on the implications of their decision to switch.
-Signed porting form

2. Simplified validation method:

Customer authentication plays an important role in the Number Portability process. Both the Recipient and the Donor operator have an interest in an effective process around customer authentication and validation. We developed a solution for this, which is the SMS validation for Mobile Number Portability and Interactive Voice Response validation for Fixed Number Portability.
The main reasons to implement the SMS validation/IVR validation are shown below:
- Customer authentication: Action required from subscriber. It is really the customer that wants to port.
- Input validation: No typos or non-existing numbers in the database. If the wrong number is submitted to the system, no match is made and the Donor will not receive the order.
- Number is active: Action required form the subscriber with the 'to be ported' number. For sending the text message (or making the IVR call), the number should be active with Donor.
- Lower blocking percentage: Reduces the demand on operator customer care services and retail facilities.
- Proven solution: Currently used in all other PortingXS implementations with excellent reviews.

3. Central System sending notification messages to porting customers

For Mobile Number Portability, the customer is instructed by the shop staff to submit an SMS message with the text 'PORT' in the body to a specific free phone short code (e.g. 7678 (PORT)). By sending the SMS, the customer authorizes the order. Along with the SMS, the shop staff submits the porting request in the database. The database combines the number in the Porting Request (Ported Number) with the CLI of the SMS, and if these numbers match, the porting request is forwarded to the Donor Operator.

Question 5: Do you have any comments on the indicative costs of the options we have considered in this document?:

N/A to PortingXS

Question 6: Do you have any other comments in relation to the matters set out in this consultation?:

PortingXS believes that the future of Number Portability will become more and more Consumer lead. Meaning that a consumer will decide at anytime at any device with several supported processes in what way their number can be accessed for communication wether that is voice, messaging or data related. The tools to manage such a system will be different by different players and will allow different methods to validate against. This could be supported by electronic ID processing, biometric validation and or other new developments

in this area. To think in restraints goes against the current developments we see in the different European arena's. If the aim of the industry is to support a customer with easy access switching methods for all kind of services, the current level of technology supports switching against lower cost. Regulation should look after the KPI's, industry should take care of introduction of easy access customer tools.For this reason PortingXS has introduced a mobile application as a capability statement for industry. We welcome any chance to demonstrate this application for those that are interested.