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**By Email:** [Elizabeth.gannon@ofcom.org.uk](mailto:Elizabeth.gannon@ofcom.org.uk)

*28th October 2009*

Dear Ms Gannon

### **Ofcom's consultation on mobile number portability**

The UK Enum Consortium (UKEC) welcomes Ofcom's intention to improve the system of mobile number portability. However, whilst we are aware of the regulatory backdrop, we consider that it is misguided to only consider mobile number portability in isolation and we believe that a unified approach to developing number portability and enabling switching processes between all communication services, including mobile and fixed line telephony, would deliver a superior consumer experience.

To that end, a single central number database for fixed and mobile would allow both consumers and businesses to benefit from much easier switching processes.

ENUM is a technology that is standards based, is in live use in carrier networks and for which an infrastructure already exists in the United Kingdom.. Mass import of numbers into a central database using CRUE (Carrier Registrations in User ENUM) would ensure the process is cost effective and efficient. Once the numbers are in a central ENUM based database, number portability would be simpler to handle, faster to achieve and this would benefit both the Number Operators and end users – both consumers and business.

However, if Ofcom wish to continue looking at MNP separately, rather than with a converged communications process in mind, we include our responses to the current consultation within the attached Appendix A.

We would very much welcome the opportunity to discuss number portability with you and how ENUM might provide an effective solution, and therefore we will be in touch to seek a mutually convenient time to meet. However, in the meantime should you have any queries regarding our response please do not hesitate to contact us on the number above.

Yours sincerely

**Nicholas Lansman**  
**Company Secretary**  
**On behalf of the Board of Directors**  
**UK ENUM Consortium (UKEC)**

## UKEC Responses to the Consultation Questions

***Question 3.1: Do you agree that the bulk porting process should not be included in this review and should be left to industry agreement?***

No. Industry has failed to deliver satisfactory solutions for number portability in both the fixed and mobile space and there is no evidence to suggest that industry would be successful in delivering a bulk porting process. The problem is that naturally, industry partners are disincentivised to facilitate easier switching between service providers, and number portability requires an enthusiastic, consistent and joined up response from the Regulator.

***Question 4.1: Do you agree with Ofcom's view that the evidence suggests consumers would prefer a faster porting process?***

Yes. OFCOM's research showed that the key problems with the industry is that it is difficult for customers to move between service providers. This causes a worsened customer experience and reduces greater competitiveness in the market.

***Question 4.2: Do you agree with Ofcom's view that the current process does not work well for all mobile consumers?***

Yes, as above, we concur with OFCOM's research and market findings.

***Question 4.4: Do you agree that Ofcom should intervene to introduce changes to the current MNP process to address the harm identified?***

Yes, As above, industry has failed to address this issue to date as understandably it is not in individual industry players' interests to deliver further process improvement.

***Question 5.1: Do you agree with Ofcom's view that the 'do nothing' option is unlikely to be appropriate in light of (i) evidence of consumer harm and (ii) noting the proposed one working day porting requirement under the New Telecoms Package? If not, please give reasons for your views.***

Yes

***Question 5.2: Do you agree with the range of potential options Ofcom has set out?***

Yes, but only as far as mobile number portability is concerned, and not bringing into the equation our view of having a unified switching process for all communications services.

***Question 5.4: Do you agree that a two hour timeframe in which to issue the PACs for Options B and D is appropriate? If not, please give reasons for your views.***

Yes.



**Question 5.5: Do you agree there should be a difference between how the recipient-led processes in Option A and C should work for single account versus multi-account porting requests? Do you consider that the proposed authentication process (described in paragraph 5.41) for multi-line accounts is sufficient? Please explain any other differences you would expect to see whilst ensuring that any differences are still consistent with the overall objectives the options are trying to achieve**

Yes

**Question 5.6: For each of the options set out, do you consider that Ofcom has captured all the appropriate categories of cost likely to be incurred? If not, explain what categories you disagree with / believe are missing.**

UKEC finds this question difficult to answer due to the amount of information that was redacted from the consultation document.

**Question 5.7: Do you agree with Ofcom's analysis of costs for each cost category? If not, please explain why. Please also state whether you are able to provide Ofcom with a more accurate view of costs and if so, please submit your assessment, together with supporting evidence with your response to this consultation.**

As with Q5.6, it is difficult to answer this question in the absence of data.

**Question 5.8: In the case of new entrant MNOs, what additional costs are likely to be incurred internally within each of the networks for each of the options? Please submit your estimates in your response to Ofcom.**

There are no additional costs, as a new entrant MNO under the new procedures will simply have normal startup costs.

**Question 5.9: Do you agree with Ofcom's analysis of benefits for each option? If not, please explain why**

Yes

***Question 5.12: Please state which option(s) you favour and why?***

UKEC favours a recipient-led option with a 2 hour window, This ensures that the switching process is rapid. Ofcom should look further into the French system as they seem to have this working in a way that safeguards against slamming, whilst at the same time ensuring the consumer is in control of their number.

***Question 5.13: What do you consider a reasonable implementation period for each of the options and why?***

6 months to a year would provide ample time to implement and test.

***Question 6.1: Do you agree that it is appropriate for Ofcom to appoint a qualified independent consultant(s) to work with industry to develop cost estimates for different implementation options? If not, please state why.***

Yes

***Question 6.2: Do you agree with the remit set out above for the consultant/expert? If not, please state why.***

Yes

***Question 6.4: Do you agree that three months is an appropriate period of time for this feasibility assessment to be undertaken? If not, please explain why and what you consider to be an appropriate timescale.***

Yes

***Question 6.5: Do you agree that the criteria for making this process effective as outlined under paragraphs 6.14 to 6.16 is appropriate?***

Yes

***Question 6.6: Do you agree with Ofcom's proposed next steps following responses to this consultation?***

Yes, however, we urge the regulator to widen the brief to fixed networks and to mandate the implementation of speedy industry wide number portability.