

Response to consultation paper

Mobile Number Porting – Review of Porting Process

We would like to thank you for the opportunity to present the response. During our Post Graduate course at *Symbiosis Institute of Telecom Management* India, We have been involved in academic study of Customer Experience during various telecommunication processes; one of them being MNP in Europe. The response is outcome of this study. We believe the change discussed in the consultation paper would help improve customer experience during MNP and enhance competition in the UK market.

Thanks and Regards

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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?

We believe that Ofcom should baseline the maximum time duration for bulk porting. Other than that, Industry is the best to decide on the process to be followed for bulk porting.

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

Yes, The research conducted (Synovate – PAC mystery Shopping April 2009, Jigsaw Research 2009), suggests that the current process is not working with all customers. Following are the pain areas we could identify from the consultation paper:

- 1) Average length of phone call to request PAT was **ten and a half minute**. This is a significantly long time for verification of customer and issuing PAT.
- 2) A Quarter of all mystery shoppers received their PAC later than a day. We believe that this delay, particularly delay due to the PAC issuance by Post is unacceptable. Telecommunication, which is the fastest medium of communication, should not be using any other medium, particularly when that medium is taking 4 times the email and 8 times the SMS.

PAC Issue method	Average time taken for consumer to receive PAC (days) ⁵⁹	% of PACs issued via this method
Over phone	0	47%
SMS	0.5	28%
Post	4	22%
Email	1	2%

Source: Synovate PAC mystery shopping, April 2009

- 3) The current time period for number porting is quite big for UK. Some of the countries which adopted the MNP later are having duration of number porting lesser than that of UK. Other than Consumer’s need, we believe that to maintain technological edge and to align itself with EU, steps should be taken to reduce the time period of number porting to 1 day.

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

Yes, We believe that current Process does not work well with the customers.

Significant number of customers in the mystery shopping experiment faced severe retention activity. Although this might end as a better deal for some customers but it might have its own effect.

- a. We feel because of this retention activity, a distinction is being made between customers who can bargain and who can not.

- b. We feel that in order to protect customers from the unwarranted negotiations, they should be provided additional option with a free phone on the Donor's network by calling which they can obtain PAT instantly. The present process should continue for customers who would like to negotiate to get a better deal from their current operator.
- c. As per Mystery Shopping results (4.25 to 4.27) suggest that customers were refused PAC even when they were entitled to have it. The effort should be made to create awareness among customers that they can't be refused PAC because of their contractual or any other financial obligation to the Donor Operator.
- d. A Customer during porting should be protected from any unwarranted communication by Service Providers, both Donor as well as Recipient. Both the touch points should be available in an automated manner along with the present modes. For e.g.

Touch Point	Purpose	Present Mode	Additional Modes
Donor Operator	Obtain PAC	PAC request can be made using Telephone, SMS, Fax, Email, Post	Automated SMS, IVR Telephone, Web Based request on the website of Donor Operator
Recipient Operator	Port In	Retail Shops or Agents of Recipient Operator	Use Website for Port in – Fill form on the website of Recipient Operator to port in.

We believe that Both Donor and Recipient should provide MNP using web interface. Donor Operator can provide PAC from its website instantly on its website. Additional modes like Automated SMS service where customers can obtain their PAC by texting on a designated number and IVR phone service can be used to reduce difficulty faced by customers. Similarly Recipient operator can use web to accept customer information and PAC. This would substantially reduce Customer's interaction with the operators.

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

Yes, We believe in the wake of information provided in the consultation document that Ofcom should intervene to improve customer experience during MNP process. Along with that, we feel that standardization direction given by EU body is a good enough reason to improve the MNP process both in reducing the time and effort by the customers in getting their number Ported.

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, we believe it is inappropriate. Please see answer to above question.

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

Yes, the numbers of options provided by the Ofcom are suitably sufficient.

Question 5.3: Do you consider that there are additional options that Ofcom should have considered? If yes, please explain what option(s) should have been considered and why.

We feel option of 1 day porting time in the short term (2-3 years e.g. till 2013) and instant porting (after 3 years e.g. after 2013) should have been considered. In the short term, even if porting in 1 day time frame is considered, long term view of the Regulator (Ofcom) should be clarified. This would help Service Providers work and make provisions to achieve it. Also, it saves them from un - forecasted spent by sudden change in the Ofcom Policy and gives them additional time to upgrade their systems.

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, we feel it is appropriate though it can also be reduced by automating their systems.

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:

We think that similarity in the porting process for single and multi-account would lead to less cost to the service providers.

Question 5.11: Please explain whether you agree with Ofcom's assessment of the pros and cons of each option and if not, why not.

Yes, The assessment is comprehensive

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

We favour **Option D** in the short term and would like to see industry move to **Option B** in the long term. They can start moving towards Option B, whenever they are ready. We feel eventually moving to near instant porting is unavoidable.

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

After formation of guidelines, 6 months to 1 year depending on the option finally selected for the industry.

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, An accurate cost estimates are desired in this case.

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, 3 months is an appropriate time.

Question 6.6: Do you agree with Ofcom's proposed next steps following responses to this consultation? If not, how do you consider Ofcom should complete its cost-benefit analysis and proceed to an implementation of one of the four options?

Yes, We agree with Ofcom's proposed next step.

Question 6.7: Do you have any comments on the proposed timings for reaching a conclusion for this review?

For the benefit of the customers, new process of MNP should be introduced as early as possible. But any haste in the move can bring additional risks. We think 12-24 months is a sufficient time to introduce new MNP Process.

Further Action	Time Required
Feasibility study by a independent consultant	3 months
Final Consultation and Response Evaluation	6-8 months
Issuing Guidelines and Introduction of the new process of MNP	6 months – 1 year

