

Gideon Senensieb

From: Guy, James [jguy@arbinet.com]
Sent: 16 January 2007 8:31 PM
To: Gideon Senensieb
Subject: Response to "Review of General Condition 18 - Number Portability"

Gideon,

First let me introduce myself, I am an ex BT Brit of 27 years now working and living in the US. I work for a company called Arbinet that provides an 'Exchange' type environment for carriers and operators around the globe. I am currently investigating the international impact and solutions to support number portability. This issue is not only applicable for the traditional E.164 fixed and mobile but also for enum and Virtual numbers. For the purposes of my comments though I will restrict to Mobile as that generates the biggest issues.

- 1) Your proposal in my view represents the right way forward and the arguments look compelling for both the NGN environment as well as the speed to port issue. However (and not a criticism) is that it is very UK focused and does not address the international community. Clearly as the UK regulator that should be the focus but would suggest that the UK can take a leading role with this initiative to show the way for the international community. I think the early push in the UK for portability created the environment we see today in Europe.
- 2) As all the international traffic is based on the number block allocation there is no choice but to send the call to the donor network. In many cases there are hefty charges and penalties levied as it often falls outside the close scrutiny of the in-country regulators. This also has the negative impact of creating 'bilateral' arguments between the carriers as these charges are hard to track / validate.
- 3) In support of our customer base we have been attempting to gain access to the in country portability databases so that we can assist the Originating Carrier /PTT to correctly identify the Recipient Network. We have been given read access in some countries to achieve this. Clearly this is a much more efficient and lower customer cost solution than the alternative especially when the % of ported traffic increases.

I raise this point as there is an opportunity with your review to address this growing problem by allowing limited access into the ACQ/DB in support of international inbound traffic. If other nations followed suit say via the IRG then this would be equally beneficial for the UK consumer base. It is not a stretch to see how this type of approach could also apply to international roaming.

Thank you for the opportunity to respond.

Many regards
Jim

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