Question 1: Do you agree that an ACQ/CDB solution is required to achieve independence of Donor Networks?:

Yes

Question 2: Do you agree that an ACQ/CDB solution common to both fixed and mobile networks is the preferred option?:

Yes

Question 3: Do you agree that any transition to ACQ/CDB should occur in the course of migration of fixed networks to NGN architectures?:

Yes, but there needs to be a maximum timescale for the fixed line operators to update their systems to ensure ACQ/CDB can be fully implemented

Question 4: Do you agree that it would be beneficial to require the mobile industry to complete its transition to an ACQ/CDB solution by September 2009?:

Yes

Question 5: Ofcom would welcome respondents' analyses of the costs and benefits of a comprehensive transition of the mobile industry to direct routing using NICC Service Description 8 or other suitable standard within one year, ahead of a further transition to ACQ/CDB.:

No Comment

Question 6: Ofcom welcomes views from stakeholders as to the appropriate approach to be adopted in achieving the implementation of ACQ/CDB whilst ensuring that such co-operation is limited to technical matters directly related to the ACQ/CDB solution.:

Ofcom needs to drive the process and be responsible for getting the technical and software architecture agreed on the basis of the new NGN based networks. The requirement of all service providers need to be taken into account as the incumbents do not have the same incentive to implement ACQ/CDB NP as the new VOIP and mobile operators

Question 7: Do you have any comments on the transition milestones and their corresponding dates? Could the dates be achieved earlier? Alternatively, could any of the dates be at known significant risk of being missed?:

As it mentions in the report agreed standards need to be set quickly then the timescales can be looked at on the basis of a know agenda.

Question 8: Do you agree that Ofcom should require port lead times to be reduced to less than one working day? If you do not agree, please provide evidence that shows otherwise.:

Assume this questions is in relation to Mobile NP but not sure why you have not included reference to fixed line porting. My following comments below relate to both fixed and mobile.

There is no reason why port time cannot be reduced to less than 24 hours but only if all operators are forced to implement a common fully automatic NP backend system.

Also the industry needs an automatic unilateral porting agreement between all operators (Fixed and mobile) to be implemented by Ofcom. This would eliminate the current ridiculous situation were most fixed operators today?s are only able to port numbers from 1 or 2 providers. This causes confusion to the customers and also creates a barrier for customers to move business. Again it seems to us the incumbents have no incentive to change this situation unless Ofcom forces it upon them.

Question 9:Alternatively, do you agree that Ofcom should require port lead times to be reduced to three working days?:

See 8

Question 10: What is a reasonable timeframe for the implementation of a one working day process?:

1 year for mobiles, 3 years for fixed line

Question 11: Do you consider that a three working days port lead time process could be implemented within 6 months?:

Yes but only if Ofcom force it

Additional comments:

Ofcom needs to address the issue of Geographic numbers being "Hoarded" by existing Service Providers. This could prove a disadvantage to new entrants as for example there are no new 0207 numbers available. This will be much easier to manage with NGN's as numbers could be issued/recalled in much smaller blocks even down to individual numbers.