

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

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

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

**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?:**

**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.:**

**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.:**

**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?:**

**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.:**

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

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

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

**Additional comments:**

Hay Systems Ltd (HSL) welcomes the adoption of an ACQ/CDB solution as a means to remove the dependence on a Donor Network and the current exposure faced by consumers to network failures occurring with a Donor Network. The existing reliance on a Donor Network results in a lesser degree of benefit being delivered to the consumer through the ability to port than would be the case if there was no reliance on a Donor Network. Poor network reliability may give rise to a consumer porting to another network in order to try and achieve a better service. However, the existing reliance on a Donor Network can result in a consumer continuing to experience service problems due to this reliance and can also reflect badly on the network to which they have ported. It is important for the mobile industry to ensure the adoption of stable standards to address issues relating to the interconnection of networks, of

which Number Portability (NP) is one such issue.

Further to the above HSL would like to make the following observations:

- the adopted solution should not discriminate against small PECNs, act as a barrier to entry against small PECNs or inhibit competition by small PECNs in an industry dominated by large MNOs;
- any adopted solution should support SMS termination;
- any adopted solution must not decrease the reliability of voice call termination or SMS termination;
- the method of voice call termination and SMS termination from PECNs outside of the UK should be unaffected by any change in the UK's support for NP.

We wish to take this opportunity to comment on the concern of some MNOs included in the consultation document in relation to the allocation of 07x number blocks to new entrants such as ourselves. In HSL's particular case such numbering is strictly being used in the provision of mobile services and in keeping with the UK Numbering Plan. Identical, but competing, services are being offered by a number of the UK MNOs and as such we suggest their concerns included in the consultation document and found elsewhere are invalid.