

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

Consultation title: Review of General Condition 18 – Number Portability

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Representing (self or organisation/s): (Fixed) UK Number Portability Commercial Group.

Exemptions: - Cable & Wireless (non-signatory to this response).

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non-

Name: **Leslie G. Oliver**

Signed (if hard copy)

January 26<sup>th</sup> 2007

**(Fixed) Number Portability Commercial Group's  
response to Ofcom's Consultation regarding the  
Review of General Condition 18 - Number Portability**

## **EXECUTIVE SUMMARY**

This Industry Group understands and appreciates the reasons why Ofcom has issued this Consultation and the technical potential that may lead to changes in the way that Number Porting could be carried out in the future.

However, as overall Industry discussions on NGNs, in relation to Number Portability (NP), are still at an early stage, and also as there are a large number of Governance, Commercial and End 2 End Process issues to be reviewed, which have not been covered in this Consultation, the Group feels that there needs to be a further Co-regulatory stage, of approximately 6 months, before it would be appropriate to come to a realistic and balanced conclusion on a General Condition that in effect mandates industry investment and timescales.

There is still a great deal of commercial and technical evaluation work to be done within the NP product area, and how the routings and order processes might be affected by other (Ofcom & UK industry) initiatives. Once this evaluation work starts to produce coherent results in terms of the available / possible solutions, we can begin to lay down a reasonable (and realistic) roadmap for the developments discussed in the ConDoc.

This Industry Group feels that the standing Fixed and Mobile Number port Fora, working together, and perhaps with NGNuk and NICC, on agreement of technical options and then standards are best placed to take such work on behalf of the whole UK Industry.

At the same time, and given that the existing NP processes work well in normal circumstances there does not appear, from the evidence, a great Customer imperative to change, at least until the full balance of factors above is worked out and a full End 2 End understanding of Number Administration and Number.Porting (which could be done in different ways and at different levels) is fully apparent.

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## Introduction

The Number Portability Commercial Group (“NPCG”) welcomes Ofcom’s Review of General Condition 18 – Number Portability.

Many Communications Providers operating in the UK have introduced or are introducing Next Generation Networks (NGNs), operating in vastly different ways from today’s legacy networks, capable of delivering a range of innovative services not currently provided, and providing traditional services in entirely different ways. Given these technological changes that are occurring, industry and Ofcom need to move forward carefully together to ensure that the future is not hindered by today’s regulation, but at the same time ensuring that the regulatory framework supports the changes that are coming.

## Response to the Ofcom Consultation Document

1. The Fixed Number Portability Commercial Forum represents a wide range of fixed Communications Providers (CPs), successfully handling many million GNP and NGNP ports per annum, through an open supervisory body, with Industry agreed Process manuals and subsequent bi-lateral agreements between participating CPs.

2. We fully understand that, in an emerging NGN environment there can be new ways to undertaking porting, of itself and as part of other industry process’s (e.g. LLU) - which might be more efficient and which could protect customers better in the (rare) event of a CP closing down their network - and their business not being taken over by another.

[In reference to the ‘Atlantic Telecom’ issue (paragraph 2.1.4 refers), this Industry Group feels that the importance placed on resolving issues generated by the potential failure of another CP, reflecting the Atlantic failure in 2001, is disproportional to the overall issues facing the industry as we approach the implementation of NGN’s in the UK, and fails to reflect the industry agreed fallback arrangements that would kick in should such an event occur]

3. Therefore this Industry Group, whilst agreeing in principal with the implementation of an ACQ/CDB solution, has concerns around the issues of timing and cost. We note the time scales laid down in the ConDoc but do not understand exactly how these time scales have been arrived at - what criteria were used to decide the ‘roadmap’? Are the timescales achievable?

In addition, this Industry Group is unconvinced by the stated costs to industry in the report. It does not appear that any commercial considerations were used to arrive at the stated costs. We therefore feel that the possible and outline technical solution and timescales are being laid down in a General Condition without sufficient clarity and overall balance on:

a) a general lack of explanation or vision about the whole of Number Administration in a NGN environment and the role of a Central Data Base (CDB) in that (for example) does Ofcom still envisage allocating numbers to CPs in 10k blocks - do they envisage doing that across all Number Ranges, including those to be brought into use by 2012?

The NGN initiative, being led by BT Group, is at the stage of development where existing services are just beginning to be migrated to the new backbone. The Project timetable has always shown a migration of existing products and services to the new infrastructure before any developments of new or existing products or services can take place. This puts us in the position where much of the information required in order to make an informed decision is not yet available.

The UK was one of the first countries to launch NP and did not, at the time, have the benefit of a great deal of international experience in this area. Since then many other countries have launched various NP products and there is now a great deal of international experience which can be drawn upon. The consultation has missed an opportunity to give a rounded view of this collective experience, supplying the background for just two European countries. Presentation of a broader range of international solutions could have facilitated a better informed debate.

b) the examination of the role of a CDB has not been fully explored, nor indeed have any viable alternatives e.g. does it cover all numbers or just ported ones? This Industry Group feels that the standing Fixed and Mobile Number port Fora, working together, and perhaps with NGNuk and NICC, on technical options and then standards are best placed to take such work on behalf of the whole UK Industry.

This Industry Group considers that the implementation of an ACQ/CDB solution would benefit some parts of the UK industry but is unconvinced as to the benefits for predominantly fixed line CPs. We feel that a UK Industry Group approach is needed in order to get the right solution implemented. We believe that any initiative led by NICC and/or NGNuk along with the existing Number port Fora in this regard could, and should, be supported by all UK stakeholders.

We understand that some work in this area may have already been completed by NICC and/or NGNuk. If so, information can be shared with individual CPs in order for individual CPs to join the debate and make informed decisions. Perhaps a NICC/NGNuk led RFI process should be begun in order to evaluate the suitability of possible solutions and prospective Third party Vendors.

c) there are concerns, in terms of industry dependency and individual network integrity, that alternatives for the role and scope of a CDB have not been fully explored. All calls real time dipping into it versus two tiers of database, with individual Tier 2 CP databases taking synchronised feeds from the Tier I base?

In terms of the possible solution being highlighted by Ofcom (paragraph 3.5 refers) there are concerns around the synchronisation of activities. Also, this Industry Group has concerns about the proposed implementation order – the implementation should consider a staggered approach when considering fixed line implementation, starting with Non-Geographic numbers (which are currently subject to a full digit decode) followed by Geographic Numbers (which are not). Additionally, timeframes for the movement of personal numbers need to be considered.

The way forward is for an industry wide Co–Regulatory initiative to gather information, evaluate the possible solutions and implement in a timely and cost effective manner. We

should not be looking at this from the position of any part of the UK Industry, but from the UK industry as a whole.

d) there is little clarity on the governance, equitable ownership and commercial running of a CDB.

There are important variables to this initiative which Industry Groups and individual CPs need to consider. The first of these is the assessment of the types of solution that may be available and the evaluation of those solutions to decide which (if any) is the most viable. There will inevitably be costs associated with the initiative. A robust assessment of costs, for the industry and for individual CPs, is necessary if we are to make any responsible decisions. This Industry group does not consider the cost benefit conclusions in the ConDoc to be conclusive or indeed based upon a realistic assessment of the initiative.

Another variable for individual CPs is the cost of a 'full digit decode' for all calls before any routing takes place. Currently routing (of Geographic Numbers) takes place based on the block allocation, how does this change to 'full digit decode' affect the interconnect arrangements and settlements. For example, can individual CPs successfully identify calls that are not delivered to the 'range holder' and bill them appropriately?

However, we believe that much work has been performed by NICC (and others) in this area and that some cost benefit information, in relation to this initiative, may already be available.

4. There is another important question to be answered; will all CPs adopt the new NGN structure by 2012 or will there be CPs who have not implemented the change. If this were to be the case then there may be a need to maintain the traditional onward routing solution for a period of time. Also, how will incoming International calls be dealt with in both commercial and technical terms.

So, in terms of the Fixed Network operators, the timescales as laid out in the ConDoc can not be commented upon constructively at this time as there are still too many unknowns. Areas such as how NGN infrastructure will be implemented and the varying times for Operators to move from Legacy TDM networks to NGN or Hybrid Networks are still not fully explored and/or developed.

5. The overall UK Industry Investment decision depends on a holistic view of other factors which are not adequately covered in this Consultation Document

- as Ofcom recognises, the verification and authentication of fixed and mobile porting requests, in a converged future process, is fundamental for customers (we are awaiting another Ofcom Consultation Document on this subject).
- a complete review of the Industry bi-lateral/universal End 2 End porting arrangements, the service establishment process and commercial arrangements - in which the CDB (and associated commercial) are but a small part.

6. So, a better way forward is perhaps a cooperative-regulatory approach (as with the Migration, Switching and Mis-Selling Consultation) - with the commercial and technical options for the scope of a CDB being taken forward by the current existing Industry Porting

bodies (within a 6 month period), who would also derive a Governance model for CDB options.

In parallel with this initiative, Ofcom could also outline to the industry how they envisage Numbering Administration might work overall once NGNs are ubiquitous.

All this activity could lead to a conference prior to a proposed revision along the lines Ofcom sets out of General Condition 18, which will be needed to ensure the necessary uniformity of approach, and the strategic investment decisions, can be achieved in the autumn of 2007?



## Conclusion

As overall Industry discussions on NGNs are still at an early stage and also as there are a large number of Governance, Commercial and End 2 End Process questions to be reviewed and which have not been covered in this Consultation, the Group feels that there needs to be a further Co-regulatory stage, of approximately 6 months, before it would be appropriate to come to a realistic and balanced conclusion on a General Condition that in effect mandates industry investment and timescales

This Industry Group feels that the standing Fixed and Mobile Number port Fora, working together, and perhaps with NGNuk, as that becomes established, and NICC, on technical options and then standards are best placed to take forward such work on behalf of the whole UK Industry.

At the same time, and given that NP processes work well in normal circumstances there does not appear, from the evidence, a great Customer imperative or other urgency for change, at least until the full balance of factors above is worked out and a full End 2 End understanding of Number Administration and Number.Porting (which could be done in different ways and at different levels) is fully apparent.

This Industry Group believes that this ConDoc and the report contained within it has not taken enough notice of the concerns of individual CPs in terms of timescales. There is a great deal of evaluation work to be done within the NP product area, and how the routings and order processes will be affected by other (Ofcom & UK industry) initiatives. Once this evaluation work starts to produce coherent results in terms of the available / possible solutions, we can begin to lay down a reasonable (and realistic) roadmap for the developments discussed in the ConDoc.

In terms of the required Port (order) lead times, the focus of the Ofcom Consultation Document is on the Mobile NP product and not with fixed line NP so, at this stage, this Industry Group feels that the Mobile Industry Group is better placed to respond to these questions.

Finally, Ofcom have made the statement that any move to reduce or otherwise amend, the fixed Port (order) lead times will be conducted through the Ofcom Migration, Switching & Mis-selling initiative lead by the Migrations Industry Working Group (IWG) – where we understand Ofcom propose another Consultation shortly.

These initiatives, if kept separate, could lead to a solution which is not cost effective in the medium to long term. The initiatives should be more 'joined up', across Ofcom and industry. The further 6 months of detailed Industry work, on governance, commercials and technical Number Port matters needing resolution could better align with that next Consultation.