# Response to the Review of General Condition 18 – Number Portability

on behalf of Orange PCS Ltd

26 January 2007

***Summary***

Orange welcomes the opportunity to comment on Ofcom's proposals for a review of General Condition 18 and the number portability framework for fixed and mobile networks in the UK.

ACQ/CDB

We support Ofcom's view that a converged ACQ/CDB, based on a common reference architecture, is a good solution – in principle – for number portability in view of ever converging markets. However, we must strongly qualify our support, as we cannot make a comprehensive cost/benefit analysis based on the current level of information available on the implementation of an ACQ/CDB (and the interim milestones) and how it would be run and governed. Whilst we understand Ofcom's preference for any technical and governance solutions to be devised by industry, in view of the complexity of the proposed changes as well as the large number of parties involved, it is crucial that Ofcom takes a firm steer and offers guidance on how the end goal will be achieved. We must stress that we are unable to provide a cost/benefit analysis of an ACQ/CDB without further details of how this will be implemented, because there are so many "unknowns" which simply cannot be costed or analysed without that detail.

In view of this, we believe that Ofcom needs to reconsider the timescales proposed for the implementation of an ACQ/CDB, particularly the timeframe suggested for the agreement of standards and governance arrangements, and the suggestion that mobile networks should move to an ACQ/CDB ahead of fixed networks. We believe that such a staggered approach would significantly increase complexities as well as the costs of implementation and would create major difficulties for cost apportionment between fixed and mobile operators. In view of technology neutrality, all networks should work to the same timeframe. Orange is a converged services provider, and as such, it is not practical or cost effective for the mobile and fixed arms of the business to move to an ACQ/CDB at different rates.

In order to move the process forward, we would suggest that Ofcom seek to bring together a working group involving members of the Mobile Number Portability Operator's Steering Group, the Fixed Number Portability Commercial Group, the NICC and NGNuk. With Ofcom as a facilitator, industry as a whole can come together to begin discussing the principles and options available for the implementation of an ACQ/CDB.

Direct Routeing

In theory, Orange is supportive of the implementation of direct routeing for mobile networks via NICC Service Description 8. However, this depends very much on the roadmap for the implementation of an ACQ/CDB, as Orange would not wish to undertake significant investment in

what may become a short-term stop-gap solution. Furthermore, Ofcom's suggestion that direct routeing could be implemented within one year is not realistic. Whilst the technical specification may have been agreed, neither a project plan has been drawn up nor resource allocated for its implementation. Furthermore, development costs and the availability of resources need to be fully considered.

Mobile port lead times

Finally, with regards the third strand of Ofcom's consultation, we do not agree that a one working day porting process is viable or necessary in view of the obvious lack of evidence of consumer demand necessary to justify the investment and service quality concerns (bearing in mind a possible future move to a new number portability solution). On the other hand, we are open to the idea of implementing a three working day process, although we would not be able to implement a shorter port lead time within 6 months. This would not allow sufficient time to secure budget and resource for the necessary changes to working processes and training.

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

In principle, we would agree that a centralised database system for number portability is required in order to have donor independence. However, whilst the end product would, in theory, bring donor independence, how this goal would be achieved is unclear, particularly bearing in mind the autonomous processes and systems currently in place for mobile and fixed networks and the interim steps needed to reconcile the two. Therefore, further information about how the ACQ/CDB will work, how it will be implemented, and how it would be funded/managed, is needed in order to conduct a full feasibility study on whether an ACQ/CDB would be the optimal solution for donor independent number portability in the UK.

The proposal for an ACQ/CDB suggests that this should be based around a common referencing architecture. We agree that global experience and security concerns surrounding reliance on a single database for all real time routeing point to the potential benefits of a common reference architecture. In order to begin to formulate a proper assessment of such an architecture, however, much discussion and brainstorming is still required, particularly as the proposed changes outlined in the consultation document will have a significant impact across a number of business areas. In short, there is insufficient detail as yet on technical and practical implementation to assess properly the viability of the concept of a common reference database architecture.

Moreover, only once this information is available will be we able to gain a full view of the costs of implementing an ACQ/CDB solution. Our initial view is that Sagentia's estimates are too low. For example, the OPEX figure stands optimistically at less than 4% of CAPEX. Our experience with such projects is that realistic OPEX figures should stand at closer to 10% of CAPEX. We are concerned that commercial considerations were not taken into account to arrive at the stated costs.

To illustrate the extent of the impact of changes to number portability across the business and the level of information required before a cost/benefit analysis can be conducted, we have highlighted some examples of affected areas and relevant questions, below:

<u>Security and continuity of service</u>

Whilst a reference architecture may appear to promote security and integrity, relieving some of the concerns about the ACQ/CDB introducing a single point of failure, there are still key security issues to be addressed. For example, in view of mobile signal loops, the failure of one local database or synchronisation issues could lead to service delivery problems, which would directly affect the end user, impacting port lead times across fixed and mobile networks. It is therefore absolutely critical that all operators have the same version of the database at all times.

"Fall back" options also need to be discussed early on to ensure adequate porting levels can be guaranteed, particularly in view of the large number of operators involved and the short port lead times expected of an ACQ/CDB. The identification and selection of fallback options alone is no mean task with questions to be answered regarding procedures, the level of redundancy envisaged to ensure continuity of service, how the CDB will be resynchronised after a failure (and by whom), and who would be ultimately responsible for call route failures. Moreover, the choice of fallback option would likely impact upon the overall cost of implementing the ACQ/CDB.

Order Handling

The order handling process will remain separate from the ACQ/CDB under Ofcom's proposals. There are numerous questions which must therefore be asked in order to ensure the proper interaction of the two: How will the current order handling process conform to the new number portability architecture? How will port activations be "uploaded" to the CDB? Who will be responsible for the uploading activity, the donor or the recipient or both, how will this be synchronised? What conformation will there be in the order handling systems to ensure this is done on time and in the correct manner? How will this affect the ability of individual communications providers to take downloads from the CDB? What trigger mechanisms will be required to ensure synchronisation of the downloaded information? The answers to these questions will help us better understand the viability and costs of implementing an ACQ/CDB.

Signalling

An ACQ/CDB solution is likely to increase the signalling load significantly and investment in additional signalling links would be required in order to cope with this. Our own internal databases may also need to be extensively expanded in order to manage the process of uploading/downloading from the master database (although to what extent and how is hard to quantify without further information). However, it is not possible to assess these design and development costs with the level of information currently available about the implementation of an ACQ/CDB.

Billing

Billing is another area that will be affected. Our interconnect billing systems will likely need to be upgraded in order to handle the prefixes used to route calls to ported numbers and billing systems will need to be able to link with our local portability database to enable accurate billing. However, interconnect tariff implications and investment needs cannot be enumerated without more information about the implementation of an ACQ/CDB.

In order to begin to address these technical issues, as well as the other issues identified in our response, such as governance arrangements, and to ensure any centralised number portability

solution meets the requirements of all operators (fixed and mobile), we would recommend that Ofcom seek to bring together a working group involving members of the Mobile Number Portability Operator's Steering Group, the Fixed Number Portability Commercial Group, the NICC and NGNuk over the coming months. We believe that Ofcom has a key role to play in facilitating such discussions (for example by setting out the options available and Ofcom's expectations for a fixed/mobile number portability solution).

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

In principle, we would agree that this is the preferred and most logical option. With the convergence of networks and the need for technology neutrality, as supported by Ofcom's Statement[1] on the matter last year, a number portability solution that is common to both fixed and mobile networks makes the most long-term sense (although, as we discuss in response to question 4, we do not agree that mobile networks should be required to move to the common solution ahead of fixed networks).

We do need to qualify this support, however. Whilst an ACQ/CDB solution common to both fixed and mobile networks would be the ideal solution on paper, we need further detail and guidance from Ofcom as to how such an integrated solution would be implemented in practice. There are important technical, cost and cost apportioning, and governance issues to be dealt with before we can construct the cost/benefit analysis necessary to confirm the viability of the proposals.

We understand that your goal is to ensure an industry-owned solution is devised for number portability in the UK – hence your reluctance to provide too much detail about your views on the implementation of your preferred option – and we would agree that a joined up industry approach is needed (perhaps at NICC or NGNuk level). However, in view of the myriad interests which have to be reconciled and lack of a business case to move to a new number portability system at present, without further impetus and information from Ofcom, it will be difficult to progress discussions.

We do not think the inertia is due to operators considering only the porting levels on their own networks, but because there is no urgent need for a new system (the current system is deemed to work well and fulfil customer needs). You suggest there may be a need for regulatory intervention on this issue; however, we must stress it will be difficult to meet any requirements without a clear steer from Ofcom with regards how we transition from the status quo to a converged ACQ/CDB. The recurring message from the various divisions within Orange affected by number portability is that they need more detail as to how the ACQ/CDB for mobile and fixed networks would work in practice before they can make any qualified assessments of the viability of the proposal.

[1] Number Portability and Technology Neutrality, Statement, Ofcom, 30th March 2006

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

We agree that it makes sense to move to an ACQ/CDB solution in the course of migration to NGN architectures. However, we need to ensure that transitional arrangements and the final ACQ/CDB is not driven by the requirements and timescales of any one NGN (or small group of NGNs) in particular. It should be borne in mind, for instance, that the CDB download mechanism could be decoupled from the query mechanism, thus giving flexibility in implementation for all providers.

We also feel that both mobile and fixed networks should transition to any ACQ/CDB solution simultaneously, rather than taking a staggered approach, as suggested in the consultation document. Sagentia's study does not consider this sub-option in its modelling exercise, although we believe this would be preferable both from a cost apportioning point of view and logistics perspective.

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?***

We do not agree that it would be beneficial to the communications industry as a whole or to the consumer to require mobile operators to move to an ACQ/CDB solution ahead of fixed networks. The added logistical complications of a two-tier approach and the accelerated timescale that this would require for important discussions on technical specifications and the governance structure are key factors which must be taken into account.

Ofcom's reasoning for requiring mobile networks to move to an ACQ/CDB ahead of fixed networks is that the former's network is already capable of querying a database upon every call. Whilst it may be true that mobile network switches can be upgraded more easily to an ACQ/CDB when compared with current fixed TDM networks, we do not think that the additional costs (development as well as implementation costs) of migrating from a mobile only ACQ/CDB to a mobile and fixed ACQ/CDB combined have been sufficiently considered by Ofcom. The issue of cost apportioning in particular must be addressed: if a staggered approach is taken, how would the initial design and implementation of any ACQ/CDB be funded? Who would be expected to pay the set up, enhancement and additional testing and development costs in the transition from a mobile only ACQ/CDB to a mobile-fixed combined solution? Such a two-step approach would likely be more costly – and these costs would ultimately have to be recovered from the consumer.

In addition to the critical issue of costs, there are also questions over who will be involved in the design work in the early stages. Logically, if the initial ACQ/CDB is intended for mobile networks

only, it will only be the mobile operators involved in the design, especially if they are paying most/all of the early development costs. However, if the ACQ/CDB is intended to migrate to handle fixed/mobile traffic, it is likely that the fixed operators will want to be involved in the early stages in order to protect their longer term interests when the transition does occur. However, that might cause difficulties and tensions. If Ofcom has determined that a mobile ACQ/CDB should be established 3 years before the joint one, the mobile operators might legitimately take the view that the initial design should be suited to their purposes.

In terms of timescales, from a technical perspective, the September 2009 timetable is not reasonable in view of the lack of implementation information and standards currently available. With fixed and mobile operators working to different timescales, number portability priorities may also not be aligned, delaying progress in technical implementation.

Moreover, from a practical perspective, discussions on governance and cost apportioning – which would be further complicated by a staggered approach – are yet to begin. We do not believe that it is realistic for these issues to be agreed by July 2007, as proposed. Indeed, such an accelerated timetable could led to sub-optimal arrangements being agreed, which would affect the performance of the final number portability system adopted in the UK. Ofcom should not underestimate the magnitude of the groundwork that still needs to be undertaken and we would stress the need for more guidance from Ofcom at this stage. As highlighted in response to question 1, we believe that Ofcom should seek to facilitate the establishment of a working group/forum in order to begin discussing the available options for number portability.

Ofcom will be aware of changes to the existing Mobile Number Portability Operators' Steering Group which are currently being considered and proving to be somewhat difficult to agree. We regret that Ofcom has chosen not to be more proactive in providing guidance where operators are unable to agree. Greater Ofcom involvement will certainly be required if new governance arrangements are to be put in place encompassing the entire fixed and mobile industry.

We should also point out that the 2009 timescale, if insisted upon for mobile operators, would rule out any possibility of implementing direct routeing in the interim, as the investment costs would not be recoverable over such a short time frame. Moreover, it would be difficult to ensure sufficient technical expertise and resource to achieve both projects simultaneously.

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.***

Our initial thinking is that there is an argument for the implementation of NICC Service Description 8. However, this would very much depend on the final plans and roadmap for the implementation of an ACQ/CDB. Based on Ofcom's current timescale for example, it would not be cost efficient or possible from a technical resource perspective to implement direct routeing in the interim.

Ofcom states that SD 8 is "well understood" and can be implemented within a year (3.58). However, consideration must be given to the fact that SD 8 was not mandated by the NICC and Orange has not taken steps to implement it. We do not believe that Ofcom's timetable for implementation is realistic. 2007 budgets have already been allocated and the relevant technical and project management staff have already been assigned to other projects, which means that any obligation to implement direct routeing within the year would mean foregoing certain commercial priorities and new services for customers. Further time and resource would also be needed to assess and address the changes/upgrades needed to other impacted systems and processes, as direct routeing, like the implementation of an ACQ/CDB, would also have wider implications on the business and network. It should also be borne in mind that direct routeing could only be properly effected if implemented by all mobile operators, therefore any timescale must be practicable for all involved.

We would also like briefly to register our concerns about suggestions made in the consultation document that the DCC could be reduced to 0.1 pence per minute under the current mobile number portability system. Such a reduction would not be acceptable to Orange as it would not cover the basic costs of onward routeing. Indeed, our transit costs alone are double this amount. While onward routeing is still in place, the donor operator must be able to fully recover the costs of forwarding calls. If any changes were to be made to the level of the DCC, proper and detailed consideration would have to be given to the level of genuinely incurred costs to ensure that these could be fully recovered.

Even aside from the timescales, Ofcom must be very clear that the real benefits of a move to SD 8 do actually outweigh the costs, particularly if it is planning to implement a move to an ACQ/CDB in any case. This is not an issue which should be approached purely as a matter of principle.

In terms of our analysis of the costs and benefits of migrating to SD 8, these are broken down below:

Costs

Costs can be divided into software costs, hardware costs and the costs of upgrading/adapting other network/service elements in order to accommodate direct routeing.

Firstly, the cost of developing and testing new software to handle direct routeing, including the migration of subscribers to the new system (active, dormant, and ported numbers), is expected to cost over half a million pounds and require at least 6 months development time.

Secondly, we must allocate costs for potential upgrades to SLR[2] hardware, as the additional queries made on the SLR could lead to the need for more capacity. This would cost an additional half million pounds and would also require significant technical resource and at least 6 months development time. We should point out that software and hardware changes cannot necessarily be performed simultaneously.

Furthermore, we expect, for instance, that the SD 8 solution will generate more interconnect signalling for queries to the other operators, which may require more signalling links on the interconnect. This would have cost implications, which are to be determined. Implementing these new links could take up to around 3 months internally; however, this would depend on partners also being able to meet timescales.

Finally, direct routeing implementation cannot be considered in isolation. There are significant projects underway in our core network, for example, which would need to interlink tightly with SD 8, and testing and contingency needs to be factored in.

Based on these considerations, as well as internal resource issues and the fact that no project plans have yet been drawn up, we do not believe that it would be possible to implement direct routeing in less than 18 months.

Benefits

The key benefit of implementing direct routeing is, as Ofcom has identified, that the standard has already been agreed and direct routeing could deliver efficiencies to mobile number portability (for instance through more streamlined billing processes). However, a full quantitative analysis is still required.

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.***

The governance and oversight structure for any ACQ/CDB system implemented is of paramount importance. We would agree that industry co-operation should as far as possible be limited to technical and operational matters, although we feel that it will be a difficult task in practice. In order

[2] Service Location Register - performs essential subscriber look-up functions

to maintain the focus of the group, it is essential that Ofcom plays an active facilitator role and that you give clear guidance from the outset on good governance arrangements and how an ACQ/CDB should be implemented. Ofcom's involvement in the industry-led process will also help to alleviate commercial concerns that may arise.

Governance of the database must be based on the principles of openness, transparency and fair representation. In short, any body managing number portability in the UK must fairly represent the whole UK industry on a non-profit making basis. Your suggestion of the creation of a Company Limited by Guarantee and owned by the members to oversee number portability seems to be heading in the right direction, although the finer details of this structure will need to be fleshed out by all those affected. For instance, consideration needs to be given to the following to ensure a representative "governing body": What will be the membership criteria? Will there be different levels of membership? How will this be reconciled with the need for proper cost apportioning - will funding and governance be linked? And, how will the provision of fair and equal access to the system be ensured?

In view of the importance and influence of the central, master database, it is critical that this – and the data contained therein – remains neutral and independent. The database must not be owned by one individual stakeholder, but be owned by the industry group. Moreover, commercial third party contracts must also be handled fairly and carefully. Specifically, no contractor appointed by the governing body should have a permanent contract to set-up/administer/manage the ACQ/CDB. Any contract must be reviewed periodically, and be subject to an open tendering process.

How the ACQ/CDB will be funded and the transparency and fairness of these arrangements will also have a significant bearing on the success of the platform and the sense that it is properly governed. The costs of building and operating the ACQ/CDB will be significant and must be fairly apportioned: all users should contribute appropriately, taking into consideration differences in levels of use of the system and the ability of users to contribute equal fees. However, it should also be borne in mind that supporting more than one means of funding the system (e.g. pay per dip and pay per download) could add to the overall running costs. Therefore, inclusive, universally accepted, and proportionate accounting principles must be agreed from the outset.

Coupled with the fact that technical standards are yet to be agreed, in view of the range of issues to be resolved and the number of players involved, your July 2007 target for the agreement of governance arrangements for the database appears somewhat ambitious and we would strongly advocate putting in place a more realistic timeline to allow necessary discussions.

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?***

The milestones identified by Ofcom are very broad in nature. As discussed throughout our response, it is difficult to make detailed comments on the viability of the proposed ACQ/CDB system – and hence the transition milestones – without further detail about how the end solution would be achieved and would operate, and in the absence of interface specifications. More guidance is needed on how the transition to an ACQ/CDB will take place and the changes to current processes and procedures that will be required. For instance, "milestone d" states: "Records of all ported numbers hosted on NGN nodes to be populated in the database – September 2009". However, no detail is available as to how this will be done and how the "switchover" would be made between the current and new system. You note that NGN design and planning activities need to be informed early of plans to transition to an ACQ/CDB (3.63); however, equally, a transition plan cannot be put into place without more guidance on what an ACQ/CDB will look like and how it will fit into NGNs.

It is vital to understand that number portability is an issue that cannot be considered in isolation. Ofcom must be mindful of the major impact these changes will have across the business and not underestimate how wide-ranging these changes will have to be. The internal impact of moving to an ACQ/CDB is expected to be significant as it also touches upon business critical areas, such as billing and customer account and subscription management services. Whilst the consultation focuses on the milestones for the common elements of a new system, consideration does need to be given to the impact on internal processes and systems (as well as the cost implications) and appropriate time allowances made for this. Currently, it is impossible even to estimate what the cost and resource implications will be without further information.

In view of this current lack of information, it is difficult to see any of these milestones being met within the ambitious timeframes set out. In short, we have ascertained in discussions with colleagues that we've only just scraped the surface of the possible impact of number portability and that much more information is needed before a cost/benefit assessment can be made, and project plans and timescales can be properly drawn up.

We understand your view that the ACQ/CDB solution implemented should be owned and defined by industry. However, there is a real need for Ofcom to play a leading role in facilitating discussions. Each of the milestones listed risks real danger of being missed without additional guidance at this stage. As a first step, Ofcom should encourage members of the mobile and fixed number portability groups, as well as the NICC and NGNuk, to come together to begin discussing the options for number portability and how Ofcom's preferred option could be achieved.

***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.***

Orange is concerned by the slightly confused wording of this question and what it reveals about Ofcom's approach to this issue. Ofcom has provided no evidence of the need to move to a port lead time of less than one working day, and nothing that supports the statement that long port lead times "*may discourage*" consumers from switching. It states only that its research "*would suggest*" a lead time of less than a day, even though only one country in the world has been identified which currently adheres to these timescales. Orange also notes that Finland (which Ofcom identifies as having the highest levels of porting) also has a 5 day port lead time.

Despite a lack of evidence to support its position, this consultation question requires those who take a different view to provide evidence. Clearly, this is an entirely unsatisfactory basis for any regulatory intervention, although evidence is easy to find.

Ofcom must surely be extremely disappointed that its own research so clearly fails to support the position that it appears already to have adopted on every conceivable measure:

- Just 3 out of 1,167 people interviewed (0.26%) spontaneously cited port lead times as a reason not to switch;
- When prompted only 5% cited it as a reason;
- Only 14% of those who had ported were dissatisfied with the time taken;
- Only 4% of those who switched and did not port their number cited porting time as the reason.

However, perhaps most revealing is that 48% of those interviewed thought that the time taken to port was less than two days. This clearly demonstrates that actually shortening the port lead times to that level would not affect the consumer behaviour of those who already think that port lead times are shorter. This fundamentally undermines Ofcom's central contention that shortening port lead times would change consumer behaviour by encouraging switching.

More generally, Ofcom will be aware that annual churn levels in the UK are close to 30% in one of the most competitive mobile markets in the world – one in which operators are jointly forced to spend billions every year simply to acquire and retain their customers. Orange believes that it is fanciful to suggest that any barriers to switching exist and that regulatory intervention is required in order to encourage consumers to benefit from competition.

Orange is extremely disappointed that Ofcom appears to be ignoring evidence produced by its own research, preferring instead to rely on a "gut reaction" that short port lead times should be implemented regardless of the cost and lack of demand.

In terms of the substance of the proposal, we do not agree that port lead times should be reduced to less than one working day. As well as a lack of evidence supporting the investment required, we believe it would not be in the consumer's best interests from a service delivery perspective.

As Ofcom has identified, in order to achieve a one-working day port lead time, in addition to the changes that would be necessary to the Syniverse system, current internal processes would need to be automated. This would require significant investment and development time and more evidence is needed that port lead times affect switching rates to the extent that merits significant investment in new processes and systems (particularly if there is to be a migration to an ACQ/CDB).

Even with the automation of internal processes, a one working day port lead time would not be desirable in view of the need to prevent fraudulent porting and to ensure good service delivery levels i.e. to avoid/adequately deal with routeing errors and failures. If a one working day porting process were enforced, this would mean, for instance, that the monitoring of status reports would have to be done constantly to identify points of failure before the port date (rather than thorough checks being done in batches and in time before the port date). This is a time consuming task in itself, but there is the added complexity that it would be difficult to gauge the level of monitoring needed at any particular point.

We also note that your arguments for reducing port lead times to one working day do not explicitly consider the special case of bulk porting (currently defined as 25 MSISDNs and over), which is a service required mainly by our business customers. Currently, additional time is allowed for bulk porting; however, the new proposals do not consider this, suggesting the reduction would apply to both classes of porting. Bulk ports can mean the transfer of thousands of connections from one network to another. Rushing this process through in a shortened time frame would open the door to greater error, whilst not allowing time to correct these or system processing problems.

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

We believe that reducing port lead times to 3 working days would be a viable (so long as port numbers remain stable) and more proportionate approach than requiring a one working day port lead time. However, consideration still needs to be given to the issues we've identified above (e.g. re bulk porting), and we have concerns that Ofcom's timescales are not realistic (please see question 11 below).

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

We do not agree that it would be reasonable to impose a one working day process, regardless of the timeframe.

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

We do not believe that a three working day process could be implemented within six months for a number of reasons.

2007's budget has already been allocated and signed off; therefore, there is no scope for including a work package to reduce port lead times to three working days this year. Additionally, in view of commercial priorities, it would be difficult to secure the necessary resource internally within the next few months.

Time must also be allocated for software development and training purposes, as well as for the condensation of current procedures. Whilst the changes to the software might not be very significant, it will be difficult to secure the resource to do this in the next 6 months. A three working day process, which maintains expected service levels, would require the training of new and existing colleagues. It must also be borne in mind that all mobile operators will need to have implemented the internal process changes in order for a three-day process to take effect, so any timescale needs to be co-ordinated amongst all the operators.

*All queries in relation to this response should be to Simon Grossman, Regulatory & Public Policy, Orange, 50 George Street, London W1U 7DZ* – simon.grossman@orange-ftgroup.com – *0870 373 1659*