

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

Yes: The ACQ/CDB solution will allow originating networks to determine how to route specific calls to a destination network without interacting directly with a Donor Network. Not only will this prevent against a failure of a Donor Network but will provide an originating network more control over the levels of service they are providing to customers. Overall network planning is simplified without having to consider calls being routed through a Donor Network and as a result conveyance cost would be reduced or eliminated which has potential benefits to the consumer.

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

Yes. In light of Ofcom's decision regarding number portability and technology neutrality it is essential that both fixed and mobile networks utilise a common platform for implementing number portability. In this decision Ofcom's modification to the Number Portability Condition permits portability of numbers between different types of network including fixed and mobile. If consumers are to enjoy the flexibility of porting telephone numbers interchangeably irregardless of technology then there need to be processes and systems developed that can interoperate between the different types of network technologies. The ACQ/CDB solution must implement a number portability reference database which provides the necessary routing references to all network operators which will then facilitate Ofcom's vision of achieving technology neutrality.

**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.:**

Pearson recommends that Ofcom establish criteria for the selection of a neutral-third-party administrator in order to administer the ACQ/CDB system. As discussed in Pearson's response to Question #2, it is assumed that the ACQ/CDB must ultimately be able to support a solution which provides a single reference CDB that is common to all network technologies; both fixed and mobile. Neutral third party administration of the CDB information ensures the equal treatment of all operators and technologies. Such administration facilitates consumers' access to the network services by preventing any one carrier from interfering with interconnection to the database(s) or the processing of routing and customer information. Neutral third party administration would thus ensure

consistency of the data and interoperability of number portability facilities, thereby minimizing any anti competitive impacts.

**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?:**

Pearson recommends that a CDB vendor be selected one year prior to required operation of the ACQ/CDB. According to the current schedule as envisioned by Ofcom, this will require a CDB vendor to be selected by 1 September 2007. This would seem reasonable considering that standards and governance arrangements are scheduled to be completed by July 2007 based upon Ofcom's recommended intermediate milestones.

**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?:**

Experience in other countries indicates that it is feasible to reduce porting times to less than one working day for mobile-to-mobile ports but it is essential that the mobile operators agree to an automated process for communicating ports between the Recipient and Donor mobile operators. For example the overall process to port a mobile-to-mobile number in the United States is 2.5 hours based upon the consumer's desire to be able to use their new telephone within a reasonable time after purchasing service from a new mobile operator. The time allotted for the recipient mobile operator to receive authorisation from the donor mobile operator is 30 minutes. The mobile operators cooperated by developing a specification and process containing a standardised data structure, common data elements, and communication protocol providing mobile operators the best opportunity to complete the authorisation process within the allotted Interval

**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:**

Pearson Government Solutions (Pearson) welcomes the opportunity to comment on Ofcom's General Condition 18 consultation regarding number portability.

? Pearson agrees that the establishment of a Direct Routing solution using ACQ/CDB will be the best approach in order to protect consumers against a network failure will ensure the most efficient use of networks and will provide technology neutrality.

? Pearson agrees that the timeframes contemplated by Ofcom are realistic with regards to the planning,