

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Review of General Condition 18 – Number Portability

To (Ofcom contact): Gideon Senensieb

Name of respondent: Aileen Boyd

Representing (self or organisation/s): Scottish and Southern Energy plc

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing	Yes	Name/address/contact Details/job title	No
Whole response	No	Organisation	No
Part of the response	No	If there is no separate annex, which parts?	

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Name Aileen Boyd

Signed (if hard copy)

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Date: 26 January 07

Dear Gideon

Review of General Condition 18 – Number Portability

I write in response to Ofcom's recent document on the above, which was issued on 16 November 2006. This proposes a modification to General Condition 18 to promote improvements in the process and lead-times for enabling consumers to take their numbers with them when they change from one service provider to another.

SSE is a retail service provider in the fixed line market and is interested in promoting simple and effective switching arrangements for customers across all technology platforms. We therefore support Ofcom's intentions to make number portability as easy and swift as possible for customers as, in our experience, being able to take their number with them is an important consideration for customers contemplating switching service provider. We agree with Ofcom that the current "onward routing" approach to number portability leads to customer issues in the event of network failure and may currently place an uneven burden on network providers across the industry.

We are unable to comment on the detailed technical solutions proposed and how long it would take to implement these, but we offer the following observations on the route that Ofcom proposes.

- We note that Ofcom is revisiting its previous consideration of the issue of portability solutions based on a central database due to the advent of "next generation networks" (NGNs). This is a good example of changes in technology allowing a new and beneficial approach to an issue to be "designed in" from the early stages of a technology change. We therefore support Ofcom's vision to require network operators, in technically feasible timescales, to develop the central data base approach to number portability as NGN architecture is developed in parallel.

- We are also very supportive of Ofcom's proposals around developing governance for the development of the new database approach. We believe that there are a number of areas in the development of the wholesale and retail communications markets where competition and consumer benefit will be best served by developing comprehensive governance arrangements that are owned and implemented by the industry. We are aware that NGNuk is working to develop this concept for the overall technology shift represented by the move to NGNs. It may be appropriate for a link between the overall NGN governance and the governance, in particular, of the proposed number database to be developed and fostered by Ofcom.

I hope these comments are helpful.

Yours sincerely

Aileen Boyd
Regulation Manager