

OnePhone UK Ltd response to Ofcom Consultation 'Arrangements for porting phone numbers when customers switch supplier'

The response of OnePhone UK Ltd to Ofcom's Consultation & Statement "Arrangements for porting phone numbers when customers switch supplier".

Introduction

OnePhone welcomes the opportunity to provide input to this Ofcom Consultation.

Although OnePhone is a new entrant MNO in the UK, utilising spectrum in the GSM guard band, we are also responding to this Consultation on the basis of our knowledge of number portability in other European markets, most notably Sweden, where our sister company Spring Mobil has extensive and relevant experience of operating porting arrangements in both the fixed line and mobile number domains. It should be noted that the majority of Spring Mobil's customers in Sweden port-in both fixed and mobile numbers. We anticipate that OnePhone's UK customers will have similar expectations.

Ofcom's Objectives

We agree that the current UK arrangement of call forwarding is unacceptable and support Ofcom's desire to move to an all-call query based system utilising a shared database as quickly as practicable, so that calls can be routed directly to the destination network. Our experience indicates that this should permit improved efficiencies and lower costs, leading to lower prices for end users.

Moving to recipient-initiated porting, rather than the current donor-initiated system, is an equally important measure to ensure operators do not seek to intervene or create obstacles when a customer seeks to port their number out.

In Sweden we have good experience of the recipient-led porting process, which has made it far easier for customers to switch providers, as the porting order and customer contract can be combined in a single document for the customer to sign. From a competition perspective, we believe this is the most important change as it has a direct impact on the end customer and their propensity to complete the move to a new provider. As a result, it directly impacts on the new provider's willingness to invest in customer acquisition, thus increasing the overall level of competition in the market.

However, we also support Ofcom's contention that the current 5 day porting process is far too long; we appreciate Ofcom setting a shorter time for the porting process.

A common numbering database

We believe that it would be advantageous to have all ported UK numbers (i.e. mobile and fixed line numbers), included in the proposed database.

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Timing / nature of deployment

OnePhone supports and welcomes Ofcom's suggested 31 December 2008 deadline for the establishment of a common database to enable Direct Routing of calls. We believe that with the goodwill of Operators and a firm approach from Ofcom, this deadline is achievable. As a new operator, it will be beneficial to be able to introduce our systems to take account of the proposed changes to the UK porting arrangements.

We trust that Ofcom will also ensure that the necessary governance arrangements for a recipient-led porting system will be put in place within the proposed timeframe.

We accept however that this target is ambitious and see merit in the NICC's suggestion that Ofcom should continue to review the position and conduct and publish a formal appraisal in 2010 and 2011 to ensure any difficulties are identified and addressed.

SIM Locking of Handsets

In conjunction with the proposals to facilitate the porting of mobile numbers, OnePhone believes it is appropriate for Ofcom to consider the question of Operator SIM locks, which can provide a further bar to consumers switching their provider. We believe that a strong case can be made to introduce and require UK MNOs to adhere to a set of agreed clear standards (as exists in many other European countries, e.g. Sweden) for the practice of SIM locking of handsets, so that there is a single unified & harmonised practice in the UK, with which consumers can become conversant. This should specifically include the consumer's ability to be relieved of any SIM-lock after an initial contract period has expired.

SMS

SMS operates by a sending-customer's SMS Service Centre conveying the message through to the destination mobile with reference to the HLR of the range-holder (which in the case of ported numbers modifies the destination to get the SMS to the recipient network). OnePhone supports NICC's view that it should be possible to devise a solution for SMS which would involve UK MNOs querying the common numbering database to get calls directly to the correct terminating network.

Moreover, as SMS is only one usage of SCCP signalling interactions it should be possible to ensure that all of the other signalling will also be directed to the correct network, without requiring modified routing.

While we believe this approach is feasible for conventional mobile networks, it has been pointed out that SMS is now provided to lines on fixed networks. At present, mobile networks simply pass all SMSs for geographic number ranges to BT, as the UK's only provider of SMSs to fixed lines. We therefore support NICC's proposal that the existing arrangements be retained for SMS to fixed networks, with the situation being reviewed should other fixed networks enter the UK SMS market.

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Preferred Options

- OnePhone therefore supports Ofcom's most ambitious and preferred 'Option A', requiring the industry to collaborate on the design & implementation of a common database capable of supporting direct routing of calls to fixed and mobile ported numbers, to the timeframe outlined in the Consultation.
- We believe it is appropriate for Ofcom to set simultaneous deadlines to use the database for the Direct Routing of Calls by the most ambitious target - 1 September 2009 for ported mobile numbers and the end of 2012 for all other calls.
- We strongly support the move to recipient initiated porting, which we believe is even more significant and beneficial to the customer than the reduction in the time taken to achieve the port, albeit that this too is a benefit.
- We urge Ofcom to ensure that the necessary arrangements are implemented to ensure effective governance of the implemented system as soon as possible.