Question 3.1: Do you agree that the bulk porting process should not be included in this review and should be left to industry agreement?:

Yes

Question 4.1: Do you agree with Ofcom?s view that the evidence suggests consumers would prefer a faster porting process?:

Yes - but this is partly to remove the uncertainty of when a port will take place. Many people would probably be satisfied with a 1 or 2 day porting process if they knew that their port would occur within a 15 minute window.

Question 4.2: Do you agree with Ofcom?s view that the current process does not work well for all mobile consumers?:

Yes. One particular problem is where the donor operator, who is not the range holder, does not clear the number properly from its network. Subscribers on that network are then unable to call the number.

Also, the use of the internet, either from a computer or the phone, for requesting the port is ignored. This can be a quick and good way of initiating the port and avoiding unwanted save activity.

Question 4.3: Are there any other areas of consumer harm that have not been identified? Do you have any evidence to demonstrate other areas of consumer harm?:

Yes. One particular problem is where the donor operator, who is not the range holder, does not clear the number properly from its network. Subscribers on that network are then unable to call the number.

Personally I have known 5 people in this situation.

Also the current method is an impediment to market entry, with the need to establish bilateral communications between all parties.

Question 4.4: Do you agree that Ofcom should intervene to introduce changes to the current MNP process to address the harm indentified?:

Yes.

This intervention should facilitate a scheme that makes it easy for new entrants to the market place; protects customers from slamming or other unauthorised porting and protects customers from being caught with 2 concurrent irrevokable contracts. The proposed warning SMS is unlikely to do this, given that it is not a real-time process and is not assured delivery.

A donor-led operation, with protection against delay and with means to avoid unwanted save activity would seem preferrable to a cumbersome recipient-led operation, where the customer could suffer considerable delay waiting for text message responses. The use of the Internet or

a phone service (or automated SMS) to deliver a PAC, and any necessary warnings on contract periods, in real-time (or near real-time) would seem good.

Whether any save activity is justifiable or whether it is a distortion of the competition involving special save-only tariffs or discounts and boosting the tariffs for other customers is something that Ofcom should consider.

Question 5.1: Do you agree with Ofcom?s view that the ?do nothing? option is unlikely to be appropriate in light of (i) evidence of consumer harm and (ii) noting the proposed one working day porting requirement under the New Telecoms Package? If not, please give reasons for your views.:

Yes

Question 5.2: Do you agree with the range of potential options Ofcom has set out?:

No. I feel that the use of agreed porting times could be used.

Question 5.3: Do you consider that there are additional options that Ofcom should have considered? If yes, please explain what option(s) should have been considered and why.:

Ideally any porting process set up should be able to manage both fixed and mobile portability.

Question 5.4: Do you agree that a two hour timeframe in which to issue the PACs for Options B and D is appropriate? If not, please give reasons for your views.:

No. Issuance should be real-time. The only delay that should be permissable is the transmission of any SMS (which is boyond the issuing) and any agreed save action if the customer agrees to this when requesting the PAC.

Question 5.5: Do you agree there should be a difference between how the recipient-led processes in Option A and C should work for single account versus multi-account porting requests? Do you consider that the proposed authentication process (described in paragraph 5.41) for multi-line accounts is sufficient? Please explain any other differences you would expect to see whilst ensuring that any differences are still consistent with the overall objectives the options are trying to achieve:

Yes - but not as suggested. The port should be requested through the account holder's phone or Internet account and should then specify the number, or numbers, to be moved.

Question 5.6: For each of the options set out, do you consider that Ofcom has captured all the appropriate categories of cost likely to be incurred? If not, explain what categories you disagree with / believe are missing.:

No comment

Question 5.7: Do you agree with Ofcom?s analysis of costs for each cost category? If not, please explain why. Please also state whether you are able to provide Ofcom with a more accurate view of costs and if so, please submit your assessment, together with supporting evidence with your response to this consultation.:

No comment

Question 5.8: In the case of new entrant MNOs, what additional costs are likely to be incurred internally within each of the networks for each of the options? Please submit your estimates in your response to Ofcom.:

No comment

Question 5.9: Do you agree with Ofcom?s analysis of benefits for each option? If not, please explain why:

No comment

Question 5.10: Please state whether you consider that Ofcom should take any additional benefits into account and explain how. To the extent possible, please provide any estimates of these benefits and the supporting evidence.:

The ease of porting eases the pressure on the pool of numbers and reduces the chance (or risk) of there needing to be another major renumbering exercise.

Question 5.11: Please explain whether you agree with Ofcom?s assessment of the pros and cons of each option and if not, why not.:

No comment

Question 5.12: Please state which option(s) you favour and why?:

B followed by D - but both should have automated PAC generation and delivery (with SMS as an option). And both should advise if there is an unexpired contract commitment - but this should not stop the immediate delivery of the PAC.

If D is implemented, it should be with fixed time windows for the port.

Both offer good protection for the customer, both from inadvertant contract problems and from undesired save activity as well as minimising the risk of slamming or other unauthorised porting. A 2-hour window would minimise the disappointment of waiting to use a new phone - and, if fixed times were not implemented, of wondering when the port would take place within the porting day.

Question 5.13: What do you consider a reasonable implementation period for each of the options and why?:

2.5 years - to allow for changes to systems and procedures and any necessary development. This time would include the consultancy referred to in Section 6

Question 6.1: Do you agree that it is appropriate for Ofcom to appoint a qualified independent consultant(s) to work with industry to develop cost estimates for different implementation options? If not, please state why.:

Sadly yes - though it is further delay!

Question 6.2: Do you agree with the remit set out above for the consultant/expert? If not, please state why.:

Yes

Question 6.3: If you would like to recommend suitable experts / consultancies to Ofcom, please do so on a confidential basis.:

Question 6.4: Do you agree that three months is an appropriate period of time for this feasibility assessment to be undertaken? If not, please explain why and what you consider to be an appropriate timescale.:

Given the number of players, it is likely to be too short. It would need to consider both the big 5 and at lease some representation from MVNOs

Question 6.5: Do you agree that the criteria for making this process effective as outlined under paragraphs 6.14 to 6.16 is appropriate? What else is required to make this process constructive?:

Yes - again so long as it includes some MVNO and smaller player input.

Question 6.6: Do you agree with Ofcom?s proposed next steps following responses to this consultation? If not, how do you consider Ofcom should complete its cost-benefit analysis and proceed to an implementation of one of the four options?:

Yes

Question 6.7: Do you have any comments on the proposed timings for reaching a conclusion for this review?:

As above, I would expect the expert consultation would last a little longer, so that the earliest practical implementation date would be at the end of 2011.