## **Comments:**

Number portability is a very good initiative, which would bring about a lot of competition and improvement in QOS. I do not think we should have any third party involved in this process, as we have to consider the issues of management of customer details(confidentiality)

## 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

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

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?:

Confidentiality of subscriber information and vetting of customer to determine the owner of the line. Because most operators would be more interested in signing up a new customer, some of the vetting checks would be avoided

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

YES . Introduce some penalties for non compliance

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.:

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

YES

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.:

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.:

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:

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.:

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.:

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.:

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

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.:

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.:

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

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

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.:

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

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.:

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?:

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?:

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