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, it seems ridiculous in this day and age that there is the current delay.

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

Yes, it is totally inappropriate. Change must be implemented, and soon.

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

Yes. I know of people who have been unable to obtain a PAC and have had to resort to threats of reporting to Ofcom or give up on their number in order to change providers.

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 it is totally inappropriate. Change must be implemented, and soon.

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

Yes

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 it is totally inappropriate. Change must be implemented, and soon.

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.:  

The only suggestion is instantaneous transfer, but this may cause problems from any unscrupulous companies 'slamming' numbers.

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.:  

It is a reasonable delay, especially compared to the current system. If a new phone is also being purchased, this won't even cover the charging time for the battery. Therefore, 2 hours is a minor wait.
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:

I don't think there should be any difference between the two. Any semi-robust computer system should be able to deal with multiple accounts.

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.:

Ofcom should be aware of any providers not willing to implement the changes might drastically overstate their costs in their responses 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:

Yes

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?:

Option A or Option B

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


6 months maximum. Preferably 3 months.

**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.:

No, it will undoubtedly just be a waste of money.

**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.:

No, should be done in 1 month at the maximum.

**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?:

Just impose it as a General Condition and implement it asap.

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

Just impose it as a General Condition and implement it asap.