

Consultation response form

Your response

Question	Your response
<p>Question 1: Do you agree with our provisional conclusion regarding market definition? Please provide reasons and evidence in support of your views.</p> <p>Yes, mostly. Strongly agree re 4.23 (ubiquity),</p> <p>Noted that 4.67 is absent - It is very hard to justify price rises other than to cover for reducing revenues. The transactional cost per SMS and the data cost has been reducing dramatically since it is no longer part of a signalling channel.</p> <p>4.89/4.90 the reference to "Send Routing Information" or "SRI" is part of an HLR (home location register) query.</p> <p>Many of the UK networks offer "direct access" to their network via standard text based protocols such as SMPP. SMPP does not have an SRI component. SRI queries are still the domain of signalling (SS7over IP or pure SS7). Access to the SS7 layer is often not provided directly by the UK networks but via other SS7 interconnected parties which sell HLR access.</p> <p>4.94 yes correct. But you want to look more at the wider HLR access market and restrictions to HLR access. At the moment most of the "big four" limit "aggregator" access to their HLR's with some operators doing almost exclusive deals for access to aggregators</p> <p>There is a need to scrutinise these "quasi operators" particularly those who have MNO attributes (GT's Numbering, MNC's) but without any national spectrum or infrastructure in their home territories. (Bluewave by contrast has masts, national spectrum and infrastructure and roaming agreements).</p> <p>4.109 - correct for bluewave. At the moment. Plans may change very shortly they are currently in our ir.21 but we will only start to offer a2p if we can get datafill with the main operators at a parity termination rate with the mno's own rate.</p>	<p>Confidential? -N</p>
<p>Question 2: Do you agree with our provisional conclusion regarding SMP? Please provide reasons and evidence in support of your views.</p> <p>There is a relatively low barre to being a numberblock owner. Some operators will host services for other operators.</p> <p>One should also be aware that where numberblock owners are hosting numbers entirely as "virtual mobile numbers", whether fixed or mobile ranges, the conventional porting of these numbers does not</p>	<p>Confidential? - N</p>

<p>necessarily port the signalling path for the SMS,</p> <p>Aql, for example, operates inbound SMS on many tens of millions of UK geographic numbers. When those numbers are ported via the conventional landline geographic process, the SMS part is often neglected. This area needs a wider understanding by Ofcom.</p> <p>We would probably say also rather than “each range holder has SMP”. “Each hosting provider operating routing services for each range holder has SMP”. Partly because whilst technically the rangeholder is the ultimate owner, in many cases they are not of significant trading substance and in fact they rely on the hosting operator as the telecoms operator of last resort.</p> <p>Requirement to provide network access on fair and reasonable terms. We agree that the four large MNO’s should do so. And this includes access to HLR and parity of pricing between operators for interconnect/termination charges.</p>	
<p>Question 3: Do you agree with our provisional conclusion regarding the three-criteria test set out in section 79(2B) of the Act? Please provide reasons and evidence in support of your views.</p>	<p>Confidential? ? – N</p>
<p>Question 4: Do you agree with our provisional view that setting a price cap on A2P SMS termination rates (based on historical pricing with indexation) would be the most appropriate and proportionate response for addressing our competition concerns arising from SMP (identified in section 5)? If not, please explain why.</p> <p>A price cap would be a good first intervention. It would also drive transparency of industry pricing.</p>	<p>Confidential? ? – N</p>
<p>Question 5: Do you agree with our provisional view that Option 2 would be effective in addressing the risk (identified in Section 5) that terminating MCPs have the ability and incentive to set and maintain prices for the termination of A2P SMS at an excessively high level, while Options 1 and 3 would not fully address that risk? If not, please explain why.</p> <p>We agree (and do so in full knowledge that this defines us as SMP). It is also imperative that all SMP operators provide MT access to their networks on a fair basis based on need-to-route rather than commercial tiering.</p>	<p>Confidential? ? –N</p>
<p>Question 6: Do you agree with our proposal to set the price cap at a level based on an average of the four large MNOs’ December 2020 prices, adjusted using CPI? If not, please explain why.</p> <p>Yes in part, but ideally to set the cap lower.</p> <p>The existence of a cost per MT SMS stems back to when an SMS text message occupied valuable payload space within the Messaging Application Part of a communication channel. With modern standards and protocols, SMS is simply a data payload and its’ cost is now disproportionate to the network overhead.</p> <p>To properly support the digital divide between smart and non-smartphone owners, MT SMS should be</p>	<p>Confidential? ? – no</p>

<p>positioned and capped at ca £0.01. Domestic MO SMS should be also capped at the same rate.</p> <p>It's unclear what has driven the per-unit price increases over the past half decade other than perhaps the declining SMS volumes (as a result of 2FA applications and OTT)</p> <p>And/or perhaps licensing fees from next generation platforms levying per-transaction costs for messaging throughput (ie the mobile core vendors) pushing up transactional pricing per message.</p>	
<p>Question 7: Do you agree with our impact assessment? If not, please explain why.</p> <p>Yes, however, to fully cover all communications scenarios and impact, one must also consider MO messaging and the ability for all MCP's to route reply messages to other operators with numbering in the +441,2,7 number space and also capped at the same rate.</p>	Confidential? – N
<p>Question 8: Do you agree with our assessment of the potential impacts on specific groups of persons, as set out in paragraphs 2.36-2.37? If not, please explain why.</p> <p>Yes, agree.</p>	Confidential? – N
<p>Question 9: Do you agree with our proposal for a three-month implementation period following the publication of our final Statement? If not, please explain why.</p> <p>Three months is a much longer period than the typical notice period levied by the MCP's, therefore is more than reasonable for an implementation period.</p>	Confidential? – N

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