

RESPONSE TO OFCOM'S CONSULTATION: CHANGES TO THE MOBILE NUMBER PORTING PROCESS

13.05.10

Cable&Wireless
Worldwide

Cable&Wireless Worldwide is one of the world's leading international communications companies. On the 26th of March 2010 Cable&Wireless Worldwide demerged from Cable&Wireless plc, beginning an exciting new chapter in the company's history. Cable&Wireless Worldwide is a major provider of communication solutions to enterprises in the United Kingdom. We aim to provide great value and great service to all our customers, including through Cable&Wireless Worldwide's innovative Fixed-Mobile Convergence (FMC) product which integrates with our next generation network core, allowing our customers to route calls from their mobile handset via their fixed line service when in-building, roaming to our national mobile partner when outside their office. This capability is based upon the usage of spectrum licensed by Ofcom, utilising mobile numbers: therefore Cable&Wireless is a Mobile Network Operator (MNO).

Cable&Wireless welcomes the opportunity to comment on Ofcom's implementation of the changes to the Mobile Number Portability (MNP) processes. We fully welcome the decision to postpone the work on the appropriateness of recipient or donor-led porting until the outcome of Ofcom's consumer switching work is completed and fully understood.

Cable&Wireless Worldwide fully supports the proposed amendments to GC18 and expects to be able to comply with the regulation within either a six or nine month timescale.

1. DO YOU HAVE ANY COMMENTS ON THE WORDING OF THE PROPOSED MODIFICATIONS TO GC18 CONTAINED IN ANNEX 8?

Cable&Wireless Worldwide believes that the proposed modifications to GC18 are appropriate, pending the outcome of Ofcom's consumer switching activity.

- 2. WHICH IMPLEMENTATION PERIOD DO RESPONDENTS CONSIDER ACHIEVABLE?**
- **(A) SIX MONTHS FROM THE PUBLICATION OF THE FINAL STATEMENT; OR**
 - **(B) NINE MONTHS FROM THE PUBLICATION OF THE FINAL STATEMENT**
- PLEASE GIVE REASONS, AND PROVIDE EVIDENCE TO SUPPORT YOUR VIEW.**

Cable&Wireless Worldwide will be able to implement the necessary changes to its processes within either period. We caution however that some of the other new entrant MNOs may require a longer timescale due to much smaller resources at their disposal than established operators. It may be that a longer timescale is required in order to prevent the requirements becoming a disproportionate burden.