

From: webform@ofcom.org.uk
Sent: 13 May 2010 14:55
To: MNP Consultation
Subject: Responding to the Changes to the Mobile Number Porting Process consultation

Title:

Mrs

Forename:

Jacqui

Surname:

Brookes

Representing:

Organisation

Organisation (if applicable):

Federation of Communication Services

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

FCS considers that the outcome of the current consultation is a short term solution.

We look forward to the wider migration project that Ofcom is planning to consult on in the summer, which will include mobile as well as fixed and broadband, where we expect Ofcom to be more open minded about the importance of effective recipient led processes.

Companies are no longer wholly in the mobile or fixed line space but currently deliver bundles of services to customers, each service having a different migration and number portability mechanism. Other CPs have single services but cannot offer those services to customers locked into bundles. The migrations process in telecoms is overdue for overhaul. Ofcom is able to set out principles and resolve competition issues, but we encourage the industry to consider and set in train solutions for the range of issues- both practical and strategic that will enable effective migration between suppliers for all customers. We continue to favour the Central Database proposals for number portability set out by Ofcom in 2007, otherwise we fear that the current trend for bundling may thwart new entrants to the market.

Question 1: Do you have any comments on the wording of the proposed modifications to GC18 contained in Annex 8? :

In new section 18.2 Ofcom says

"In the case of Mobile Portability, where the request is for porting a total of less than 25 Telephone Numbers, the Communications Provider shall:

(a) at a minimum, allow Subscribers to request a PAC over the phone; and"

The intention appears to be that the minimum and convenient customer service is a phone call with CLI [to verify the customer] irrespective of what technology is used, and that the phone call is answered by the donor provider company. However the context of "the minimum" is not defined, for example is it speed of the process or customer convenience? It would be helpful if some explanation of "the minimum" were given in the definitions.

Question 2: Which implementation period do respondents consider achievable? (c) six months from the publication of the final statement or(d) nine months from the publication of the final statement. Please give reasons, and provide evidence to support your view.:

FCS represents new entrants and CPs and we have a preference for recipient led porting.

However as the current proposals are an interim step we support Ofcom's conclusion as the pragmatic way forward.

This will minimise disruption to the current processes in place by mobile number range holders.

Accordingly we consider that the implementation period should be six months from the publication of the final statement.