

Question 3.1: Do you agree that there is a problem in the way mobile originated calls to ported mobile numbers are routed? If not, why not?:

Yes

Question 3.2: Do you agree with our assessment of the issues associated with onward routing?:

Yes. But they ignore the problems where a past serving operator which is not the range holder has failed properly to clear down the number from its network. Then Call Grab or some other mechanism fails calls to the number based on the data within that network rather than onward routing through the range holder. That number is then unreachable by all that network's users.

Question 4.1: Do you agree with our proposed approach for assessing the net benefit? If not please explain why not.:

These omit two things:

- 1) The benefit to the mobile (and, eventually, the fixed) network of having the same call completion mechanism as the rest of the world. There must be some cost associated with switch manufacturers having to generate special versions for the UK, both in terms of the actual cost and in terms of the delay to new features as they are rolled out to the UK versions.
- 2). These benefits omit any benefit deriving from more effective use of the UK number space and the avoidance of a possible renumbering exercise. The omit the efficiencies of being able to service smaller operators who do not need a full block of a million numbers.
- 3). While fixed to mobile and fixed to fixed may be currently uneconomic, these will some day be economic as new networks are rolled out. Any solution should support this to avoid further disruption to networks.

Question 4.2: Do you agree that we have identified the relevant cost drivers resulting from a move to direct routing? If not please explain why not.:

Yes

However, the NPV benefit for any direct routing is marginal. For the mobile to mobile, it is looking at £26m over 10 years - which seems like about 50p per subscriber per year?

Surely we need to look at the broader picture if we are to justify any action?

Question 5.1: Do you agree with our assessment of doing nothing? If not, please explain why.:

Yes

Question 5.2: Do you consider that an industry agreed solution is likely to emerge that would deliver direct routing no later than 2012? If not, please explain your reasons. Would you be supportive of such a solution?:

Any industry solution must emerge from a wider set of participants than the big 5 (or is that now the big 4). Fixed line operators and smaller mobile operators must be considered and not just left to pay whatever the big boys decide.

Question 5.3: What steps do you consider Ofcom should take to ensure that such an industry commitment is serious? Do you agree with the proposed steps set out by Ofcom or are there additional measures that should be taken?:

Any industry solution should have buy in from an industry body such as NICC Standards to be serious.

Any industry commitment should be adopted by Ofcom such that it would have resource to its standard remedies should this not be achieved.

Question 5.4: What steps do you consider should be taken to ensure that any industry solution that emerges does not foreclose the opportunity for other mobile operators to participate in the short term or longer term?:

The involvement of a wider industry body such as NICC Standards.

Question 5.5: If there was a firm commitment to an industry-led solution, what role would you expect Ofcom to play?:

To adopt and then, if necessary, enforce.

Question 5.6: Do you agree with Ofcom's proposal for a backstop to mandate direct routing in the event that an industry initiative fails? Do you agree that reviewing the situation in late 2010/early 2011 is appropriate before deciding on the need to mandate?:

Yes, depending on the timescales proposed and the breadth of the industry involvement.

Question 5.7: Do you agree with our assessment of Option (3)? Please set out your reasons.:

Yes - particularly concerning fixed operators.

Question 5.8: : If Ofcom was to take Option (3) forward, what would be the costs involved in (i) making changes to wholesale billing systems and (ii) other costs? Please explain the basis of your estimates.:

No comment

Question 5.9: Do you agree with Ofcom's assessment that mandating direct routing for mobile originated calls to ported mobile numbers is likely to be the most effective way of removing routing inefficiencies? If not, what other factors that we should take into consideration, and why are they relevant to our analysis?:

Yes.

But the NPV benefit for this is relatively meagre and the bigger picture should be considered:

- 1) Better use of number spectrum and avoidance of major renumber exercises
- 2) Able to accommodate fixed to mobile, fixed to fixed and mobile to fixed (as well as national SMS & MMS) in due course
- 3) Able to accommodate non-geographic fixed portability in due course.

Question 5.10: Do you agree that if Ofcom were to mandate direct routing, the obligation should be designed in a way that would avoid mobile operators having to use direct routing where the scale of ported traffic is not sufficient to justify the up-front investment to implement direct routing?:

Yes, if this ever occurs

Question 5.11: Do you agree that by framing the obligation in a way that obliges mobile operators to route calls to mobile ported numbers in the same way as non ported traffic should avoid the risks of any unintended consequences? If not, please comment on how this obligation could best be framed.:

Yes

Question 5.12: Do you agree that the obligation to provide information on ported mobile numbers should apply to all mobile network operators from the start and not just the five incumbent MNOs? Do you agree that if there is a central database of ported mobile numbers, this should contain all ported mobile numbers including those of newer entrants who would not be obliged to implement direct routing from the start?:

Yes.

Maybe this database should be wider, to escape from the restrictions that the current dialled digit analysis places on the allocation of numbers.

Question 5.13: What do you consider to be an appropriate timescale for implementation of direct routing from the point at which Ofcom issues a final

decision? Please provide a full and detailed explanation as to why you agree or disagree with the 2012 target date proposed by Ofcom:

The timescale has a direct impact on the cost - both in that a hurried implementation is more costly and that a longer scale implementation allows amalgamating it into line with other changes (and so reducing costs).

The publishing of ports, to allow any network the flexibility to choose between onward and direct routing, needs to be in place early. Cost penalties for onward routing (ie payments for not using the central database) beyond a certain time would help speed the implementation.

Question 6.1: Do you agree that it is appropriate for Ofcom/industry to appoint a qualified independent third party to work with industry to develop a provision technical specification for direct routing? If not, please state why.:

Yes. But most of this has already been done through NICC Standards and its standards and was adopted by UKPorting (or PortCo). This work should not be lost.

Question 6.2: Do you agree with the criteria for selecting an independent expert/consultancy? If not, please state what different/additional skills or qualities this independent party should bring?:

Yes. Experience from the past work of NICC Standards and PortCo would be an advantage

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 to produce a provisional technical specification from which stakeholders can derive reasonable accurate cost estimates? If not, explain why and detail what you consider to be an appropriate time scale.:

Experience from NICC Standards and PortCo suggests that this would be short.

Question 6.5: Do you agree that a further three months is a sufficient period of time to derive cost estimates based on the provisional technical specification? If not, please explain why and detail what period you think would be appropriate.:

Yes

Question 6.6: Do you agree that the conditions we have set out as being necessary to make this process successful in its aims are appropriate?:

Yes, though there needs to be a wide industry involvement.

Question 6.8: Do you agree with Ofcom's proposed next steps following responses to this consultation? If not, how do you think Ofcom should proceed to bring this assessment of calls to ported numbers to a final decision?:

Yes

Question A6.1: Do you have any comments on the assumptions used in the CBA?:

No comment