Title:

Ms

Forename:

Nathalie

Surname:

Lescalier

Representing:

Organisation

Organisation (if applicable):

Syniverse Technologies

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?:

There are certainly improvements which could be made to the current routing model to address a donor operator that subsequently fails and therefore is no longer in existence to forward calls. There are also improvements that could yield potential efficiency improvements. In addition, it would be possible to include some accommodations to the routing of international voice and SMS.

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

Even though there are some issues with onward routing, the benefits have demonstrated its viability. Syniverse proposes that the following hybrid model might be more mutually beneficial to all parties: allow each operator to selectively direct route when it is beneficial to do so as well as terminate an incorrectly routed call.

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

These are the basic cost elements of onward routing; the relative costs of these will vary from operator to operator. The benefits in section 4.10 describe the gross benefits (cost avoidance of indirect routing). To assess the net benefits of direct routing, one would need to subtract the costs of direct routing from the cost of indirect routing. In addition to the specific benefits listed in 4.10, there are also benefits from call set up times and ending the reliance on the donor network. The costs may also be more suitably managed or minimized by the operators, by allowing operators more time to implement technologies consistent with direct routing.

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.:

Syniverse agrees in principle with the cost drivers; however, it is very difficult to be sure given that these will vary from operator to operator.
Syniverse proposes that the following hybrid model might be more mutually beneficial to all parties: allow each operator to selectively direct route when it is beneficial to do so as well as terminate an incorrectly routed call.

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

In general, Syniverse agrees with Ofcom?s assessment. Unless the economic conditions and/or technical capabilities of the operators change in some dramatic fashion, doing nothing is unlikely to meet Ofcom?s goals. Syniverse notes that providing a copy of all ports to all operators would enable an operator to build its own internal database. The operator could then implement call logic optimizing calls to be selectively call forwarded or direct routed based on the relative costs of donor and recipient network call termination tariffs.

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?:

There can be no guarantee; Syniverse suspects two or more different approaches may emerge and thus it may be difficult to select / enforce a winner.

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?:

Some countries have provided incentives for operators who have moved proactively to adopt policy matters favoured by the regulator. An alternative is to set a deadline for voluntary action which, if not met, results in financial disincentives or further regulations.

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?:

All regulatory requirements should clearly state that the solution must be open to new entrant?s participants. In some countries, the regulator has licensed the central database provider to ensure it has specific authority, but no ownership, over the central database?s design and use.

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

Syniverse would anticipate that Ofcom might act as an arbitrator between parties to ensure a solution is implemented to meet the directives. It might also provide guidance or suggestions to ensure that future operators are not precluded from participating on a fair basis.

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?:

Syniverse agrees with Ofcom?s proposal. In general, this type of ?backstop? arrangement leads to operator ?voluntary? action to avoid further regulations while providing the operators more latitude to devise a solution or implement a solution on a timeline that meets their needs and constraints. Thus, the operators are able optimize their investments collectively if not individually.

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

Syniverse agrees with Ofcom?s assessment of Option (3), especially as such systems vary significantly and changes to these systems could potentially have an impact on commercial models limiting an MNO?s ability to offer various products and services.

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.:

Syniverse is unable to provide the associated costs, as the systems vary greatly between operators.

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?:

Syniverse agrees with Ofcom?s assessment and recommends Ofcom to also consider international calls and SMS to ported numbers. By providing properly vetted and operator approved access to ported number databases, portions of the fees for implementing direct routing could be borne by foreign operators or SMS gateway vendors and enterprises who might desire to pay to access this database. Of course, inefficiencies would remain in the fixed network but that is beyond the scope of this consultation.

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?:

Syniverse agrees, it would be extremely beneficial to allow the MNO?s flexibility to continue to use onward routing if they so decide.

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.:

In general, Syniverse agrees; there appears to be benefits associated with a consistent approach to routing ported and non-ported numbers. Many countries have a policy of routing ported numbers in a non-discriminatory manner to avoid ported numbers having an inferior quality of service (i.e., longer call-set up times).

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?:

Syniverse agrees that it would be important to ensure the information regarding ported numbers was complete. Syniverse further agrees that to exchange data, a process needs to be implemented to update number routing (should the identified number be incorrect ? i.e. indirect).

In addition, currently, there are operator-specific databases of numbers that have already been ported. These databases need to be provisioned into the centralized database and any discrepancies resolved. Syniverse has substantial, unique experience with this process.

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 2012 date seems reasonable provided the operators are able to start the implementation soon. Many countries have implemented number portability in 12 to 18 months. For example, Singapore implemented a similar project within 12-months from contract signing.

It is likely that most network operators have most of their switches capable of running MNP call routing queries, but would need to add switch triggers (which is really a licensing and configuration exercise).

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.:

Syniverse agrees with this statement based on our experience.

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?:

Syniverse agrees with this criteria based on our experience. The third party should be independent and unaffiliated with any operator. Additionally, the third party expert/consultant should be prevented from bidding on supplying the mobile operators with network routing equipment and services.

Question 6.3: If you would like to recommend suitable experts/consultancies to Ofcom, please do so, on a confidential basis.:

N/A

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.:

In general, Syniverse agrees that this is an appropriate amount of time. Ofcom may want to consider that operator staff may not be available during holiday seasons and thus extend the time if it covers these periods.

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.:

Syniverse recommends a period of three-six months to account for any RFP procurement requirements and proper due diligence. This would also provide for schedule variation as the infrastructure of each operator will vary and hence there could be variation in the time required.

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?:

Syniverse agrees with the conditions that Ofcom has listed

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?:

Syniverse agrees with Ofcom?s proposed next steps.

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

5.36 ? This approach is a fine work around, for calculating the percent of ported numbers but it should also be possible to obtain the number of ported numbers provisioned in each operator?s database directly. This will yield a more accurate calculation than using percent of calling minutes onward routed as a proxy.

5.39 ? The percentage of calls to ported numbers which are trapped would vary inversely with the operator?s market share and share of ported numbers. For example, a hypothetical operator with a 1% market share would send 99% of its calls to other networks.