

ECTEL NP Comments

Response to the Consultation on Policy Recommendations for the Adoption of Number
Portability in ECTEL States
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Response submitted via email to: consultation@ectel.int

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INTRODUCTION

Neustar would like to thank the Eastern Caribbean Telecommunications Authority (ECTEL) for this opportunity to comment on the proposed policy recommendations for the adoption of number portability (NP) within the ECTEL states.

For the past few years, several islands in the Caribbean—from Jamaica to the Cayman Islands to St. Maarten—have been exploring ways to implement NP. But standalone, dedicated NP solutions are costly and require significant infrastructure investment. As a result, NP deployment in Caribbean countries has been limited to date.

Neustar believes that a centralized, regional Number Portability Administration Center (NPAC) presents the best NP solution for the Caribbean Islands. Such an approach is more cost-effective, can be more quickly deployed, and—most importantly—will maximize opportunities to encourage a competitive telecommunications landscape. Rather than reinventing the wheel, ECTEL states can save time and money by taking advantage of the existing, well-established, and proven NP approaches of either Canada or the United States.

RESPONSES TO SPECIFIC RECOMMENDATIONS:

1) ECTEL INVITES COMMENTS ON ITS RECOMMENDATION TO ADOPT A FRAMEWORK FOCUSED ON PROVIDER PORTABILITY IN THE SHORT TERM.

Neustar concurs that implementation of number portability will further reduce barriers to competition within the ECTEL states. There are several documents that might be useful to consider when finalizing the number portability framework to be adopted. First is a recent report from the Electronic Communications Committee (ECC) within the European Conference of Postal and Telecommunications Administrations (CEPT), ECC Report 155 *Number portability efficiency: impact and analysis of certain aspects in Article 30.4 of the universal services directive and general remarks on NP efficiency*. Luxembourg, November 2010. The report can be found in Appendix A and can be located at the following link:

<http://www.cept.org/files/5466/documents/ECC%20REP%20155%20-%20Number%20Portability%20Efficiency.pdf>

2) ECTEL INVITES COMMENTS ON ITS RECOMMENDATION TO IMPLEMENT NP FOR FIXED-TO-FIXED AND POST-PAID MOBILE-TO-MOBILE SERVICES.

No comment.

3) ECTEL INVITES COMMENTS ON ITS RECOMMENDATION TO DEFER THE IMPLEMENTATION OF PRE-PAID NP PENDING FURTHER INVESTIGATION AND STUDY.

No comment.

4) ECTEL INVITES COMMENTS ON CENTRALIZED DATABASES VERSUS PEER-TO-PEER OPTIONS FOR NP.

Implementation of a centralized NP system will provide the ECTEL States with the most cost effective and pro-competitive long term solution for the efficient management of number

portability. Peer-to-peer onward routing limits the competitive aspects of number portability because the operator who is assigned the majority of the telephone numbers becomes the controlling party. Over time, this can result in network and switch limitations that may restrict the ability of customers to port their numbers to new providers.

By contrast, a centralized database does not have technical limitations on the number of times a customer may port their number to a new provider. Use of a centralized database will also provide support for IP-enabled networks and applications with ENUM (Electronic Numbering) based queries, facilitate more effective communications during disasters, and better enable operators to manage their network migration and switch load balancing.

5) ECTEL INVITES COMMENTS ON THE MOST APPROPRIATE TECHNICAL SOLUTION AND RELATED COSTS FOR IMPLEMENTING NP IN ECTEL STATES.

The most appropriate NP model to implement is All Call Query as it is a highly efficient and scalable solution that has been adopted by most countries who have implemented NP. As stated, Neustar supports the All Call Query model with a centralized database that leverages an existing North American implementation such as either the United States or Canadian Number Portability Administration Center (NAPC).

By contrast, standalone NP approaches have proven costly, time consuming, and complex to implement. Most Caribbean countries that considered implementing independent NP solutions found that doing so would require extensive investment. Such approaches have required anywhere from \$2M to \$5M (depending on the requirements) costs shared by all Island operators and recovered either as a one-time payment or as higher transaction charges. More generally, standalone NP solutions require time, resources and money dedicated to establish

technical and operational specifications, develop a Request for Proposal, and establish the selection rules of the potential vendor, review proposals and sign legal documents with the selected vendor. Operator costs to implement NP will depend on the equipment vendor they use as well as required switch upgrades, OSS upgrades, and access requirements of the NP solution that is chosen. In addition, countries need to establish a separate Disaster Recovery (DR) site and to maintain direct links to both main and DR sites.

6) ECTEL INVITES COMMENTS ON PARTICIPATING IN REGIONAL NP SOLUTIONS FOR PROVIDERS IN ECTEL STATES.

The faster and least cost mechanism to implement NP in the ECTEL States as well as throughout the Caribbean is to take advantage of a system that is already in place. This could be done in a several ways:

1. Establish a Caribbean Region NPAC system, which means adding a dedicated system to the already existing 7 regions in the US NPAC system, similar to the solution that has been adopted by Puerto Rico; or,
2. Use the Canadian NP system.

The benefit to selecting this arrangement is that specifications, processes and agreements are already in place that are proven to meet the needs of the participating operators as well as to support competition and enable consumer choice. Additionally, as more Caribbean countries participate in the NP system, costs will continue to drop. If there is a dedicated solution for all the Caribbean countries, the cost will be shared by all the participating countries thus reducing the costs for operators as well as costs to consumers.

Of course, some internal carrier costs are unavoidable, because most operators do need to upgrade hardware, software, processes, etc. However, the actual NP system costs would be shared by ALL the countries that participate. In addition, the cost to support NP would be reduced because redundancy/Disaster Recovery sites could be arranged between countries, instead of requiring two sites in each country, as is customary today in other standalone NP country implementations.

7) ECTEL INVITES COMMENTS ON THE ISSUE OF TECHNOLOGY NEUTRAL OPTIONS FOR IMPLEMENTING NP IN ECTEL STATES;

The concept of neutrality is important as neutrality requires that the porting process selected and the vendor chosen to provide NP serve the ECTEL telecommunications industry participants in an unbiased and impartial manner, without favoring any particular communications operator, telecommunications industry segment, communications technology, or group of telecommunications consumers over any other.

8) ECTEL INVITES COMMENTS ON THE NEED TO PROVIDE NP SOLUTIONS CAPABLE OF FACILITATING THE TRANSMISSION OF SMS AND OTHER NON-CALL RELATED SIGNALING.

Providing portability correction for SMS and other IP enabled applications is becoming more critical as the focus of consumers shifts from voice to SMS services. SMS port correction should be an adjunct component to any NP solution such that NP corrected data can be applied by the central clearing house that facilitates SMS delivery between operators.

9) ECTEL INVITES COMMENTS ON THE PROPOSAL TO UNDERTAKE A FURTHER CONSULTATION FOCUSED SOLELY ON THE TECHNICAL SOLUTIONS PROPOSED BY PROVIDERS RESPONDING TO THE CURRENT CONSULTATION.

No comment.

10) ECTEL INVITES COMMENTS ON THE TIME PERIOD PROPOSED TO IMPLEMENT A REQUEST TO PORT A NUMBER.

Subject to applicable regulatory requirements to support competition, most countries are moving to a one day porting window for both fixed and mobile. For example, the EU requires that its member states implement a one day porting process to better serve the needs of the consumer. The EU Directive that establishes this mandate can be found in Appendix B or can be found at the following link:

<http://www.cept.org/files/5466/documents/Directive%202009%20-%20Article%2030%20-%20Facilitating%20Change%20of%20Provider.pdf>

11) ECTEL INVITES COMMENTS ON WHETHER THE IMPLEMENTATION COSTS OF NP SHOULD BE PLACED ON PROVIDERS.

No comment.

12) ECTEL INVITES COMMENTS ON WHETHER PROVIDERS SHOULD BE REQUIRED TO CONTRIBUTE TO THE ESTABLISHMENT AND MAINTENANCE COSTS OF A NP SYSTEM OR WHETHER ALL PROVIDERS SHOULD BE REQUIRED TO BEAR THEIR OWN COSTS.

No comment.

13) ECTEL INVITES COMMENTS ON HOW COSTS SHOULD BE DISTRIBUTED BETWEEN DONOR AND RECIPIENT NETWORKS.

No comment.

14) ECTEL INVITES COMMENTS ON WHETHER PROVIDERS SHOULD BE PERMITTED TO CHARGE SUBSCRIBERS ANY KIND OF FEE FOR PORTING THEIR NUMBER.

When implemented effectively, NP is a catalyst for real competition and helps create significant consumer benefits. Subscribers wishing to change their carrier no longer need to

change their number and inform everyone they know of this change. This boosts competition between operators, which reduces prices and spurs innovation.

To ensure that consumers receive the benefits of NP, the consumers' costs for changing operators should be kept to a minimum. Although the recipient operator to whom the number is ported may have the right to collect a payment from its new customer changing their subscription, doing so is probably unwise since it could deter a consumer from making the change in the first place. Instead, in most places, the receiving operator has to make a onetime payment to the relinquishing operator. This payment should not, however, be so high that it deters the use of the service or restricts NP competitive advantages.

15) ECTEL INVITES COMMENTS ON THE PROCESS PROPOSED FOR IMPLEMENTING NP AND THE ASSOCIATED CONDITIONS ON PROVIDERS.

NP must be clearly defined by regulatory mandate in order to ensure compliance by covered operators.

16) ECTEL INVITES COMMENTS ON THE PROPOSED DEADLINE FOR IMPLEMENTING NP IN ECTEL STATES.

The deadline for implementation of NP within the ECTEL States will vary depending on the solution chosen. If the ECTEL member States chose to join an existing NPAC, number portability could be implemented sooner than if a standalone solution is chosen. By utilizing an existing NP solution, ECTEL states could implement NP in as little as 90 days, depending on a clear regulatory mandate, in order to sufficiently "motivate" the operators.

If developing a standalone system, NP may take two years or more to implement depending on the procedures and criteria that needs to be developed and the vendor selection process chosen.

17) ECTEL INVITES COMMENTS ON THE PROCESS OF VALIDATION OR AUTHENTICATION TO BE UTILIZED TO FACILITATE A PORT REQUEST BY A RECIPIENT NETWORK.

ECTEL should adopt an NP process that is driven by the recipient operator. At a high level the process would involve the recipient operator providing the donor operator a port request on behalf of the customer. The donor operator would then validate the request per industry agreed to criteria and return the request to the recipient operator indicating the details and timing to accomplish the transfer to the new operator.

18) ECTEL INVITES COMMENTS ON THE REQUIREMENTS FOR INFORMING CUSTOMERS OF THE CIRCUMSTANCES IN WHICH PORTED NUMBERS MAY ATTRACT NEW OR DIFFERENT CHARGES.

Regulation should establish the costs and charges for NP that can be passed along to the customer by participating operators.

19) ECTEL INVITES COMMENTS ON ANY OTHER ISSUES THAT MAY BE CONSIDERED RELEVANT TO THE CONSULTATION.

No additional comments.

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Appendix A

Appendix B