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Office of Utilities Regulation

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**Uniform Domestic Dialling Plan**

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**Determination Notice**

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**OFFICE OF UTILITIES REGULATION**

January 2008

## DOCUMENT TITLE AND APPROVAL PAGE

**DOCUMENT NUMBER:** TEL 2008/01

**DOCUMENT TITLE:** Uniform Domestic Dialling Plan  
Determination Notice

### PURPOSE OF DOCUMENT

This document sets out the Office of Utilities Regulation's deliberation and decisions regarding the establishment of a Uniform Domestic Dialling Plan

### RECORD OF REVISIONS

Revision Number	Description	Date
	Initial document	

### APPROVAL

This document is approved by the Office of Utilities Regulation and the decisions therein become effective on January 11, 2008

On behalf of the Office:

  
J. Paul Morgan  
Director General

8 Jan 2008  
Date

## ABSTRACT

This Determination Notice sets out the Office's decisions for the establishment of a Uniform Domestic Dialling Plan (UDDP), in response to concerns expressed in the local telecoms industry that the manner of the incumbent telecom operator's continued use of the "1+" prefix as a toll indicator on domestic calls had potential negative competitive implications for competing carriers and service providers, and also in partial fulfilment of the Office's intention to review the National Dialling Plan.

This document summarises the comments of respondents to the Office's NPRM on the Uniform Domestic Dialling Plan and the Office's responses to those comments, and outlines the basis for the Office's decision.

Six policy outcomes that should provide the basis for the implementation, by carriers and service providers, of the UDDP which is intended to provide a single dialling standard for domestic calls within Jamaica are outlined. These are:

1. Establishment of a single national standard for domestic Station-to-Station Sent-Paid calls which requires the dialling of the last seven digits of a subscriber's 10-digit telephone number. This facility will provide dialling parity for all subscribers for such calls
2. Discontinued use of the 1+ prefix, as a toll indicator for Domestic calls
3. Use of the 1+ prefix only to differentiate between 7-digit and 10-digit dialling
4. The provision of a post-dialling "toll warning indicator" for consumer protection, while reducing the number of dialled digit for domestic calls
5. Mandatory uniform domestic dialling across all fixed and mobile networks in Jamaica

The Office concluded that a post-dial toll warning indicator in the form of an audible tone signal of appropriate frequency, level and cadence, may be provided by carriers to alert callers that the call to the telephone number dialled may be charged at a rate higher than that standard for a local call.

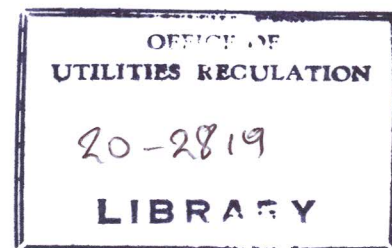
The Office recommended that an industry standard for a toll warning signal be developed in accordance with: ITU-T Recommendation E.180/Q.35 - **Technical Characteristics of Tones for the Telephone Service** and ITU-T Recommendation E.182 - **Application of Tones and Recorded Announcements in Telephone Services**.

The toll warning signal is to be implemented on a permissive basis, subject to a future review of this facility by the Office. The implementation of the Uniform Domestic Dialling Plan will not be delayed for the establishment of the technical standard for the toll warning signal.



## TABLE OF CONTENTS

<b>CHAPTER 1</b>	<b>INTRODUCTION AND BACKGROUND .....</b>	<b>5</b>
<b>CHAPTER 2</b>	<b>THE OFFICE'S NOTICE OF PROPOSED RULEMAKING (NPRM) ON A UNIFORM DOMESTIC DIALLING PLAN (UDDP).....</b>	<b>7</b>
<b>CHAPTER 3</b>	<b>COMMENTS ON THE NPRM AND THE OFFICE'S RESPONSES.....</b>	<b>9</b>
	Cable & Wireless Jamaica Limited.....	9
	Reliant Enterprise Jamaica Limited .....	11
	Mossel Jamaica Limited (Digicel) .....	12
	Columbus Communications Jamaica Limited (Flow) .....	12
	Consumer Affairs Commission.....	14
<b>CHAPTER 4</b>	<b>SUMMARY CONSIDERATIONS .....</b>	<b>15</b>
<b>CHAPTER 5</b>	<b>DECISIONS.....</b>	<b>19</b>





## **CHAPTER 1 INTRODUCTION AND BACKGROUND**

- 1.0** Effective management and administration of the numbering resources established by the National Numbering Plan and their uses in relation to the National Dialling Plan is essential to the realization of the benefits of the public switched telephone network.
- 1.1** The Numbering Plan specifies the format and structure of numbers including any segments used for identification, routing, and charging purposes (e.g., country codes, area codes and central office codes used for geographic routing and distance sensitive charges). The Dialling Plan is the combination of digits and additional information that defines the method by which the Numbering Plan is used and may include prefixes, suffixes and additional information supplemental to the Numbering Plan required to complete the call.
- 1.2** The Jamaican National Numbering Plan is a subset of the North American Number Plan (NANP), which is the basic numbering scheme serving the United States and its territories, Canada, Bermuda and sixteen Caribbean countries. The NANP shares Country Code 1 under the International Telecommunication Union ITU-T Recommendation E.164, "The International Public Telecommunication Numbering Plan".
- 1.3** In Country Code 1 the NANP numbering resources at the NPA level are administered by the NANP Administration (NANPA), which is contracted by the U.S. federal government to a neutral third party. In Jamaica, the Office of Utilities Regulation (The Office) has plenary jurisdiction over numbering resources used in the functioning of telecommunications networks, including the portion (NPA, or area code, 876) of the North American Numbering Plan resources that relates to Jamaican telecommunications networks, and the development of numbering strategies as provided under section 8 of the Telecommunications Act 2000.
- 1.4** An adequate supply of telephone numbers, available through a uniform numbering plan, is essential to providing present and future consumers with efficient access to existing and new telecommunications services and technologies and to support continued growth of an economy that is increasingly dependent upon those services and technologies. A uniform dialling plan is similarly important. The benefits of a uniform dialling plan include reduced customer confusion, particularly in today's mobile society, and support for a consistent, fair and equitable competitive environment.

- 1.5** The latter principle was endorsed by the Industry Numbering Committee<sup>1</sup> (INC) and the Canadian Steering Committee on Numbering in the late 1990's when both organizations examined the need for a Uniform Dialling Plan and recommended to regulators of NANP-member countries that a Uniform Dialling Plan (UDP) be adopted. In conjunction with the migration to the UDP, the INC recommended that the industry address the need for the continued use of a toll indicator. The fundamental objective was the implementation of a 10-digit dialling UDP throughout the NANP area with the elimination of the 1+ prefix. The prefix is used traditionally as a toll indicator and to differentiate between 7-digit and 10-digit dialling where there are interchangeable (NPA and central office) codes.
- 1.6** In North America, there has been a steady move towards the realization of a 10-digit dialling UDP albeit spurred largely by area code overlays, that is, the use of multiple area codes for the same geographic area; the concomitant elimination of the 1+ prefix generally reflects state regulatory preference. In any event, the implementation of a 10-digit dialling UDP is a prerequisite for the expansion of the North American Numbering Plan as currently proposed.
- 1.7** The 1+ prefix is not used on domestic calls in Trinidad and Tobago and Barbados. The Eastern Caribbean Telecommunications Authority (ECTEL) representing the five Eastern Caribbean States (Grenada, Commonwealth of Dominica, St Kitts/Nevis, St Lucia, St Vincent & the Grenadines) which constitute the Organization of Eastern Caribbean States has proposed, in its current draft Telecommunications (Numbering) Regulations, the adoption of a uniform domestic dialling plan which eliminates the use of the 1+ prefix for all domestic calls; the 1+ prefix is solely to indicate 10-digit dialling to other NANP destinations.
- 1.8** In Jamaica, the non-incumbent carriers have eliminated the "1+" toll prefix for all domestic calls or are applying it permissively to facilitate customers who might use it out of force of habit. No alternative toll indication is provided on either fixed to fixed or fixed to mobile calls. C&WJ has done likewise except for fixed to mobile and fixed to 3<sup>rd</sup> party fixed calls. The 1+ prefix is also used to indicate 10-digit dialling to other NANP destinations and for domestic "888" Toll Free calls.

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<sup>1</sup> **Industry Numbering Committee** - INC, a standing committee of the industry Carriers Compatibility Forum (ICCF), provides an open forum to address and resolve industry-wide issues associated with the planning, administration, allocation, assignment and use of the numbering resources and related dialling considerations for public telecommunications networks within NANP. The INC develops NANP Number Assignment Guidelines.



## **CHAPTER 2            THE OFFICE'S NOTICE OF PROPOSED RULEMAKING (NPRM) ON A UNIFORM DOMESTIC DIALLING PLAN (UDDP)**

- 2.0**    Indeed, the Office had signalled its intention, in section 8.2 of its "Determination Notice on the Jamaican National Numbering Plan", to consult on a National Dialling Plan. The Notice of Proposed Rulemaking (NPRM) on a Uniform Domestic Dialling Plan (UDDP) for Jamaica, which was published in March 2007, partially fulfilled that purpose.
- 2.1**    In the NPRM, the Office set out the basis for its proposal to institute the UDDP with the objective of providing dialling parity for all customers for all domestic calls requiring the dialling of a regular 7-digit telephone number and thereby satisfy the requirement for competitive fairness and equity for competing carriers and service providers in this market. Dialling parity in this context is to be understood to mean: equal dialling access provided to customers on all networks to reach customers on theirs and other networks. That is, no additional codes or numbers beyond the basic 7-digit telephone number are required to reach a telephone destination in the public national network.
- 2.2**    The NPRM proposed six policy outcomes that should provide the basis for the implementation, by carriers and service providers, of the UDDP that would provide a single dialling standard for domestic calls within Jamaica. These policy outcomes are summarised as follows:
1. Elimination of variations in dialling patterns for domestic Station-to-Station Sent-Paid<sup>2</sup> calls in favour of a single national standard which requires the dialling of the last seven digits of a subscriber's 10-digit telephone number, and which comprises the 3-digit central office code followed by 4-digit line (or station) number.
  2. Elimination of the 1+ prefix, as a toll indicator for Domestic calls
  3. Use of the 1+ prefix to differentiate between 7-digit and 10-digit dialling
  4. The provision of a "toll indicator" for consumer protection, while reducing the number of dialled digits for domestic calls
  5. Mandatory uniform domestic dialling across all fixed and mobile networks in Jamaica

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<sup>2</sup> A call in which the calling party dials the desired telephone number, the call is completed without the assistance of an operator (except under certain circumstances.), and the call is billed automatically to the telephone number from which the call is placed.



6. Dialling parity for all subscribers for Domestic Station-to-Station Sent-Paid calls within Jamaica

**2.3** The NPRM asked for comments on the Office's proposals for the adoption of a UDDP. The Office also solicited comments on the following broad issues:

(1) whether all carriers/service providers throughout Jamaica should be required to permit customers to dial the same number of digits to make a domestic call regardless of the identity of the customer's or the called party's carrier/service provider.

(2) Whether carriers should provide an alternative toll indicator, such as an audible tone signal or a recorded announcement, in lieu of the 1+ prefix.

(3) What standards should be applied to any call connection delays, inclusive of that from any message or non-message alerts that carriers may introduce in their networks after the customer has entered the required digits for completion of the call.

**2.4** Respondents were also encouraged to propose and explain the benefits of other options or alternatives in the context of the goal outlined by the Office.

**2.5** The Office received comments from Cable & Wireless Jamaica Limited (C&WJ), Mossel Jamaica Limited (Digicel), Columbus Communications Limited (Flow) and Reliant Enterprise Jamaica Limited (Reliant). Replies to comments were received from Cable & Wireless Jamaica and Columbus Communications Limited.

**2.6** The Consumer Affairs Commission (CAC), because of an understandable inadvertence, did not respond to the consultation. However, the Office considered the view from a consumer perspective, on the proposal to institute the UDDP, to be of vital importance in arriving at a decision. The Office therefore sought and obtained the views of the CAC in a separate consultative exercise.

## CHAPTER 3

## SUMMARY OF COMMENTS ON THE NPRM AND THE OFFICE'S RESPONSES

### Cable & Wireless Jamaica Limited

- 3.0** On October 25, 2005 and January 13, 2006 the Office notified C&WJ of its desire to discontinue the use of the 1+ prefix as a toll indicator on domestic calls. In its response C&WJ stated: "... while not certain, it did not appear that there was a technical difficulty in removing the '1' toll indicator.
- 3.1** In March 2006, C&WJ stated formally regarding the Office's proposal on 1+ dialling: "...C&WJ is not opposed to the OUR's proposal, once it is technically and practically feasible...
- 3.2** However, C&WJ, in its response to the NPRM, said it considered "it prudent and in the interest of [its] customers to continue the use of the '1' plus toll indicator which tells [its] customers that the number that they are calling will cost more than a call on the C&WJ fixed network. Calls to other fixed networks are at least 300% more expensive than on- network C&WJ calls".
- 3.3** Earlier in the same response C&WJ asserted: "We remind the OUR that by way of letter dated February 17, 2006 and titled, 'Increased Rates From C&WJ Fixed to Third Party Fixed Networks', C&WJ had advised that rates from C&WJ fixed to call Gotel, Columbus Communications (Merit Communications) and ODJ are:..." The new retail rates were given.

The company stated further in its response:

(1) "Having been penalized by the anomalous fixed to mobile regime established by the OUR, where the mobile operators are allowed to set the retail rates, C&WJ is adamant that it needs to maintain systems that allow its customers to manage their spend and prevent ruin to its business. To do otherwise is irresponsible. Therefore C&WJ maintains that 1+ dialling is necessary to protect its customers..."

(2) "C&WJ's customers therefore had to dial the '1' prefix so as to alert them to the higher charge. C&WJ's policy in this regard has consistently been that where the customer will be charged at a higher rate the customer is notified of the higher charge by virtue of the use of the '1+' dialling format. This is a consumer protection device which C&WJ does not think it prudent to abandon".



## Office Response:

- 3.4** These statements implied the reality only in part. For instance, the other fixed carriers referenced set their termination rates merely by reciprocating the rates set by C&WJ for terminating their calls on its fixed network. At least one fixed operator is advocating a regime with lower or zero termination charge for Fixed to Fixed call termination. An argument could therefore be made that C&WJ cannot escape liability for its “calls to other fixed networks [being] at least 300% more expensive than on-network C&WJ calls” and it is indeed curious that C&WJ would set retail rates as implied above and then be “adamant” to “protect” its customers from those same rates.
- 3.5** Also, despite the assertion mentioned above of a consistent policy of notifying “...the customer ... of the higher charge by ... the use of the 1+ dialling format”, C&WJ’s post-paid Mobile customers may pay upwards of 80% more for off-net than for on-net domestic calls and yet are not required to use the 1+ prefix for off-net calls. It is worth noting also that C&WJ abandoned the use of the 1+ prefix on its Mobile network, for domestic calls, long before the introduction of its current prepaid calling plans which offer consistent rates across networks.
- 3.6** C&WJ concluded: “In the event that the OUR determined to abolish 1+ dialling in Jamaica, C&WJ seeks assurance from the OUR that:
- i) ---
  - ii) ---
  - iii) The Company will be allowed to recover all cost associated with the elimination of 1+ dialling
  - iv) ---“
- 3.7** C&WJ has not intimated the level of costs and how it recovered those costs for “the elimination of 1+ dialling” in the areas of its network where that course has been taken and where the scope of work was undoubtedly significantly more than that for the remaining areas. C&WJ should therefore provide the Office with details of costs incurred and the cost-recovery mechanism employed for the initial elimination of 1+ dialling in its network, and cost details for the elimination of 1+ dialling in the remainder of its network consistent with the required implementation of the UDDP. In any case, the Office’s decision to eliminate 1+ dialling on domestic calls is predicated on the likely anti-competitive effect of the use of the 1+ prefix in the manner currently done by C&WJ, for example.
- 3.8** But, it is not unreasonable to suppose that C&WJ would have considered the fact that “even very little traffic growth brought about by an improved *numbering* scheme can rapidly pay for the costs of a [*numbering*] change<sup>3</sup>”. It is equally reasonable to conclude that the company’s removal of the 1+ prefix on inter-parish

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<sup>3</sup> **Numbering Trends – A Global Overview** | Source: ITU/Antelope Consulting (2005) | Italics by the OUR



calls, for example, resulted proportionally in increased domestic traffic on its fixed network (and for reasons not necessarily associated with reduced rates) and that the company therefore benefited from this change.

- 3.9** The Office does not perceive any significant social costs arising from the dialling plan change; the natural customer resistance to changing their familiar dialling habits is most likely to be off set by the convenience of dialling fewer digits

Reliant Enterprise Jamaica Limited (Reliant)

- 3.10** Reliant in its response to the NPRM opined: “While not accusing any one of putting up an artificial barrier, it was common in the first few years of telecommunications deregulation for incumbents to make it difficult as possible via dialling schemes for consumers to access another network. Clearly the intent was to present a ‘picture’ that this type of call was more expensive or make it so confusing that the consumer would not switch to another network provider. We would like to think that all providers are beyond this type of transparent manipulation.
- 3.11** In closing, we believe that 1+ should be eliminated for all types of “on island” calls between networks”.

**Office Response:**

- 3.12** The duly cautious sentiment expressed by Reliant is corroborated in the World Trade Organization Staff Working Paper, TISD9801.WPF, thus: “In the basic telecommunications negotiations [on the GATS Reference Paper: Ensuring Competition in the Supply of Telecom Services<sup>4</sup>], there was concern that despite the commitments to liberalize both trade and investment, telecommunications markets would still frequently be characterized by dominant suppliers that controlled bottleneck or essential facilities... the concern was that dominant players in the telecom market, left free to make decisions about how to treat other suppliers, would be capable of frustrating the market access...” The statement is elucidated with its accompanying footnote: “For instance, a major supplier, with control over essential facilities, could allow rivals to enter the local telephone call market but deny them dialling parity. That is, while its own customers had seven digit telephone numbers, those of the rival could be allotted sixteen digit numbers. We can imagine the impact a seemingly innocuous “technical restriction” would have on the relative attractiveness for customers of the two suppliers.”<sup>5</sup>

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<sup>4</sup> The Reference Paper embodies regulatory principles governing matters relevant to the prevention of abuse of dominant market positions. In effect it fosters a competitive environment preventing unreasonable restraint of trade or unfair trade practices in the supply of telecommunication services.

<sup>5</sup> WTO Staff Working Paper TISD9801.WPF - Dealing with Monopolies and State Enterprises: WTO Rules for Goods and Services

Mossel Jamaica Limited (Digicel)

**3.13** Digicel wholly endorsed the proposed establishment of a Uniform Domestic Dialling Plan which eliminates the use of the 1+ prefix as a toll indicator on domestic calls. However, the company questioned the rational for a consultation on the matter, contending that the UDDP is a necessary remedy for “the anti-competitive competitive practice of the Dominant Carrier of requiring the ‘1’ dialling prefix for calls the third party operators”. Digicel argued that the “OUR has a statutory obligation to act against such behaviour, on its own accord or, as is currently the case, on the basis of (a) complaint(s) [emphasis by the OUR]”.

**3.14** Digicel stated further that the “behaviour to date has had tacit approval of the OUR for the past years. The OUR’s failure to repress this anti-competitive behaviour leads to the inescapable conclusion that the Dominant carrier is being permitted to violate an express prohibition in the Telecommunications Act 2000”.

**Office Response:**

**3.15** Suffice it to say, the Office questions the basis and relevance of the latter statement especially in light of the fact that there has been no prior expression of concern by Digicel about the requirement of the 1+ prefix for calls to its network.

Columbus Communications Jamaica Limited (Flow)

**3.16** Flow in its comments “submits that the Jamaican consumer is well aware of the numbers that belong to the various networks and their associated charges and as such a toll indicator is not necessary”. Flow’s assertion parallels the following comment made by the New Hampshire Public Utilities Commission in an October 2002 regulatory order: “In fact, in DE 93-003, we approved seven-digit dialling in New Hampshire, removing the toll indicator, the prefix ‘1,’ and not converting to ten-digit dialling. *Investigation into New England Telephone’s Long Distance Dialling Plan for New Hampshire*, 78 NHPUC 446 (1993). In doing so, we relied, at least in part, on New Hampshire customers’ competence in adapting to new calling systems. We noted that ‘customers are required to be ever more sophisticated in their understanding of the choices offered them’ and gave them credit for sophistication enough ‘to know or determine what their local calling areas are’ even without the prefix<sup>6</sup>”.

**3.17** Continuing, Flow said: “As with respect to network requirements of numbering schemes, Flow earlier advised on how each digit corresponds to a switching stage. Therefore there is a strong cost incentive to keep numbers as short as possible”. The Office responds to say that this is an exaggeration that risks equating modern digit collection and switching techniques with the old Step-by-Step switching principles.

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<sup>6</sup> New Hampshire PUC Website - <http://www.puc.state.nh.us>



- 3.18** Flow nevertheless argues, in principle: “The OUR’s proposed uniform numbering pattern makes it easier for new entrants to present to the consumer seamless and familiar [dialling] access to the PSTN [and that] ...misdialed traffic ... aside from inconveniencing the consumer can tie up equipment unproductively and thus increase costs”

**Office Response:**

- 3.19** The Office does not agree that the use of the 1+ prefix is inherently anti-competitive, as suggested by Flow and Digicel. Such a proposition altogether distorts the truth of the historical necessity of the application of the prefix in the NANP area. Typically, a toll call is a telephone call for which a higher rate is charged than that standard for a local call. Conventionally, within the North American Numbering Plan area, the 1+ prefix has been used as a toll indicator as well as an indicator of the length of the dialling stream - differentiating between 7-digit and 10-digit calling.
- 3.20** Rather, the Office recognises the potential disadvantage to other fixed line operators, in the present realities of the local industry, of C&WJ’s partial retention of the prefix in local dialling arrangements, and the implications for the travelling public for whom an unambiguous dialling arrangement is considered advantageous. Nevertheless, the Office must balance this concern with any perceived customer need for information relating to the cost of making a call. It should not be assumed, however, that customers need such information only to decide whether or not to make a call.
- 3.21** For the avoidance of doubt, the Office expresses the view that, in the matter at hand, it is the effect of the “behaviour”, that is, the use of the “1+” prefix in the precise context in question, that may reasonably be labelled “anti-competitive”. For sure, proving a manipulative intention to a high standard of proof, as would be required, would be very difficult; however, it is not a course the Office finds cause to pursue.
- 3.22** Responding to Digicel’s questioning of the need for consultation, the Office notes that its proposed action entails a fundamental change in the national dialling plan, and again, that the 1+ prefix traditionally has a legitimate application as a NANP numbering concept. The Office’s actions must be, fair, consistent and transparent, and it therefore considers the consultative approach in dealing with this matter (on which competing carriers have contending views) to be appropriate to that end. Indeed, the law also requires consultation, as provided in sections 4 (2) (a) and (b) of the Telecoms Act which state:

“4 (1) ...

(2) In making a decision in the exercise of its functions under this Act the Office shall...



- (a) consult in good faith with persons who are or are likely to be affected by the decision;
- (b) give to such persons an opportunity to make submissions to and to be heard by the Office;
- (c) ...”

**3.23** The Office notes also that the principles of fairness and openness inherent in the consultative process are acknowledged by Digicel in its “In general, Digicel is in favour of the outlaid Numbering principles and the dialling parity and UDDP the OUR favours in the consultation document and Digicel awaits the future [further] Consultation that the OUR is contemplating on the overall numbering plan or the National Dialling Plan (Emphasis by the OUR)”.

#### Consumer Affairs Commission (CAC)

**3.24** The CAC said it believed that the “approach taken by the Office is most appropriate and indispensable in its attempt to handle the matter with the utmost probity and fairness”. However, the CAC was critical of the seeming lack of proper regard, on the part of some respondents, for the interest of consumers. The Commission suggested that some expressions of regard were only ostensibly so, and that the respondents were by far more concerned about their own commercial interests.

**3.25** In response to C&WJ’s defence of (its views on) the historic and current, validity of the 1+ dialling on domestic calls, the CAC asserts: “The reality is that behaviour which is acceptable under one dispensation [may] be completely inappropriate and intolerable under another. Changes in circumstances and context inevitably require changes in norms... Accordingly, ‘1+’ dialling having been acceptable in the past does not mean that it will be unobjectionable forever, and hence does not prevent [the effect of its use] from being properly labelled ‘anti-competitive’”.

**3.26** The Commission felt that it had not been convincingly argued “that the obstacle of ‘1+’ dialling is necessary” and agreed “that indeed ‘1+’ dialling should be discontinued in the instances under consideration”. The ground for the latter position was that a “...feasible alternative for alerting consumers to higher call charges has been proposed... It is apparent therefore that the “1+’ prefix can be removed. This satisfies the need to remove the obstacle to competition, whilst simultaneously ensuring that consumers are not taken by surprise when higher than normal call charges appear on their bills”.

## CHAPTER 4 SUMMARY CONSIDERATIONS

**4.0** C&WJ said it was “encouraged that following [its] previous discussions, the OUR has acknowledged that there must be a facility that alerts customers that a cross network call will attract higher charges, and has now proposed that a tone or recording be used”.

**4.1** That proposal notwithstanding, the Office recognized after further consideration that the new toll alert facility would have to be applied universally and thus require the existing mobile (including C&WJ) and competitive fixed line operators to revert to or commence providing toll indications. Considering therefore that the greater traffic flow is from these networks to C&WJ’s fixed network, it seems reasonable to adapt to the status quo for the former networks. Nevertheless the Office should take account of the customer’s need for information relating to the cost of making a call.

**4.2** Thus the decision before the Office’s in this matter goes to the heart of its functions as provided in sections 4(1) (c), (f) of the Telecommunications Act 2000 which state:

- “4. (1) The Office shall regulate telecommunications in accordance with this Act and for that purpose the Office shall -
- (a) ---
  - (b) ---
  - (c) promote the interests of customers, while having due regard to the interests of carriers and service providers;
  - (d) ---
  - (e) ---
  - (f) promote competition among carriers and service providers”

**4.3** The Office regards the concerns expressed by service providers as material regulatory considerations. Having therefore considered the various views articulated by the respondents to the NPRM and other relevant facts presented above, the Office sets out the following summary considerations to guide its final decision:

- 1.** Upwards of 80% of telephone customers can call without the use of the 1+ prefix, for all their domestic calls. The actual figure could increase as non-incumbent providers of domestic voice service expand their networks.
- 2.** There is a clear trend toward lower retail rates for domestic calls as competition increases, along with the adoption of single rate regimes, in both mobile and fixed markets, all of which are progressively leaving significant price differences only as between service types – Mobile,



Fixed and Special Services; and as provided in the National Numbering Plan, broad indications of price in this context are given by numbers. In essence, the distinction between on-net and cross-net calls is already being blurred.

3. C&WJ's fixed line customers currently are the ones that will be affected directly, in terms of the availability of a toll indication, by the elimination of 1+ dialling. However, the vast majority of calls that would require toll indications are the fixed to mobile calls, but mobile numbers are distinguishable from fixed numbers, as provided by the numbering plan allocation scheme, therefore the fixed line customers will have a broad indication that a higher charge will be incurred on such calls. For C&WJ fixed to 3<sup>rd</sup> party fixed calls, however, cost indications are less obvious from numbers.
4. Elimination of the 1+ prefix addresses the dialling disparity between C&WJ's fixed network and rest of the local telecoms network.
5. As currently obtains for C&WJ's, where "1+" is not dialled before the destination number on a toll call requiring the use of that prefix, the switching system terminates the call after announcing the absence of the prefix – requiring the caller to redial. A post-dial toll alert will not necessitate the termination of a call and redialling by the caller as above; the caller is left to choose whether to terminate the call (for reason of cost) before the called party answers or to continue on the call.
6. Whether it would be reasonable, in the current circumstances, to allow an operator to inform its customers during call set-up that they will incur higher charges on particular calls; and what means and manner of notification to be employed that does not place the operator whose customer is called, at an unfair competitive disadvantage are crucial questions to resolve.
7. The two proposed optional notification mechanisms, a recoded announcement and a tone signal (an audible indication is understood to be a sound composed of frequencies within the range 300-3400 Hz which is used to inform the user about the state of a telephone call or supplementary service. A tone is an audible indication comprising a small number of discrete frequencies, but excluding speech<sup>7</sup>), have important advantages and disadvantages as weighed against the following criteria:

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<sup>7</sup> ITU-T Recommendation E.182 - Application of Tones and Recorded Announcements in Telephone Services



- **Precision of information as to purpose** - A recoded announcement can impart more detailed and specific information and can have less chance of being misunderstood than a tone. However, a recoded announcement requires more time than a tone indication would to convey simple information.
  - **Need for prior customer education** – A caller may not quickly understand the meaning of a tone used as the toll indicator and be prone to allowing a call to be answered because of this impaired processing where he/she would otherwise have terminated the call because of cost considerations. The public would need to be educated regarding the meaning of a particular tone indication.
  - **Impact on call set-up** - A recoded announcement could significantly increase call set-up time for each call dialled in some cases. A tone within the duration range of common telephone tone signals of is not likely to have such effect.
  - **Customer irritation potential** - A recoded announcement on each call potentially could be an irritation to some callers, depending of course on the content and length of the message. A short distinctive tone is not likely to have such effect. However, the use of an excessive number of different tones can be confusing to the user.
  - **International Standards** - The responses that telephone networks should provide to subscribers may vary among administrations in application. The Office recognizes the limits of the foregoing to evaluate the relative merits of tones and recorded announcements.
8. C&WJ signalled its preference for the use of a recoded announcement as the alternative toll indicator (though the precise manner of that application of the facility is unclear) while Digicel, Flow and Reliant Communications expressed no views on the proposed facility which has the customer's interest as a primary purpose.
9. As stated in ITU-T Recommendation E.182 - Application of Tones and Recorded Announcements in Telephone Services, "it has not been possible in some cases to state a universally applicable preference between recorded announcements and tones. The factors influencing such a choice vary widely between Administrations in their relative importance".

- 10.** Considered against the above-mentioned criteria, the audible tone seems to have a greater advantage over the recorded announcement option as a toll indicator.
  - 11.** A toll warning indicator may be provided outside the dialling plan (similarly as the INC proposed in the case of its recommended NANP UDP)
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- 4.4** The Office concludes that notwithstanding any proper appreciation of the historical use of the 1+ prefix, no reasonable justification has been presented to persuade it that the prefix should be retained as a toll indicator on domestic calls.
  - 4.5** The NPRM did not propose to disturb the existing arrangements in non-C&WJ fixed networks and the existing mobile networks where the 1+ prefix is not employed and alternatively no post-dial toll notification is provided on domestic toll calls. Neither was any petition made by the industry, in response to the NPRM, to change or alter these arrangements and thus it seems reasonable to conclude that there is no significant expression of customer dissatisfaction with them. The Office nevertheless is mindful of the potential for bad debt where consumers are economically challenged. The Office concludes, therefore that there is no cause for it to intervene in such arrangements.
  - 4.6** In addition, the Office concludes that a post-dial toll warning indicator in the form of an audible tone signal of appropriate frequency, level and cadence, may be provided by carriers to alert callers that the call to the telephone number dialled may be charged at a rate higher than that standard for a local call.



## CHAPTER 5 DECISIONS

**5.0** Consequent upon the foregoing discussions analyses and conclusions, the Office makes the following determinations:

### **Determination 1.0:**

A Uniform Domestic Dialling Plan shall be adopted by all carriers and service providers for all domestic Station-to-Station Sent-Paid calls originating and terminating within Jamaica and requiring the use of the 7-digit directory number of a subscriber's 10-digit NANP telephone numbering address in the format:

NXX-XXXX (where N = digits 2 through 9, and X = any digit 0 through 9) consisting a 3-digit central office code (CO) code referred to as the NXX code and a 4-digit line number previously referred as the station number.

The term central office or CO code is used because of its longstanding and widespread use and because the NXX format is used for both CO Codes and NPA codes. In this application, CO means the serving or end office that provides dial tone to subscribers in the fixed network and the home mobile switching centre of a mobile station.

### **Determination 2.0:**

Domestic Station-to-Station Sent-Paid calls originating and terminating within Jamaica and requiring the dialling of the 7-digit directory number of a subscriber's 10-digit NANP telephone numbering address shall not require the use of a prefix.

### **Determination 2.1:**

The "1+" prefix shall not be required nor applied as a toll indicator for Domestic Station-to-Station Sent-Paid calls originating and terminating within Jamaica and requiring the dialling of the 7-digit directory number.

then network with a post-dialling toll warning indication, by means of an audible tone signal, that toll charges may be incurred on a call where such charges may apply. This grant of discretion shall be subject to review by the Office.

**Determination 3.1:**

The audible tone signal, which shall be transmitted only to the calling station, shall be referred to as a Toll Warning Signal.

**Determination 3.2:**

A toll warning signal should be given as soon as the information received by the telephone network is sufficient to decide that the tone applies and shall be transmitted only to the calling station.

**Determination 4.0:**

The toll warning tone to be introduced shall be determined in accordance with the provisions of:

- ITU-T Recommendation E.180/Q.35 - **Technical Characteristics of Tones for the Telephone Service** - which “sets the limits and recommended values of cadences, frequencies and levels for tones used in the telephone service. Those technical characteristics are relevant either for audible tones applied within the network or for those generated at the digital terminal equipment”. And,
- ITU-T Recommendation E.182 - **Application of Tones and Recorded Announcements in Telephone Services** – which “states some provisions and conditions for the applicability of tones and recorded announcements for user information”.



**Determination 6.0:**

The Office shall invite proposals from the local industry regarding the establishment of an industry standard for the Toll Warning Signal on the basis of the following characteristics:

- Tone composition
- Frequency (Hz)
- Signal level (dBm)
- Cadence (seconds)

The application of a toll warning signal is on a permissive basis. Therefore establishment of the technical standard for the signal shall not delay the implementation of the Uniform Domestic Dialling Plan.

**Determination 7.0:**

The non-availability of an alternative toll alert mechanism in lieu of the 1+ prefix shall not be a barrier to the implementation of the Uniform Domestic Dialling Plan in Jamaica.

**Determination 7.1:**

The availability of toll alert mechanism shall not be a prerequisite for the discontinuation of the use of the 1+ prefix on Domestic Station-to-Station Sent-Paid calls originating and terminating within Jamaica and requiring the dialling of the 7-digit directory number of a subscriber's 10-digit NANP telephone numbering address.

It is the view of the Office that price convergence will in time remove any need for a toll alert.

**Determination 8.0:**

Full implementation of the Uniform Domestic Dialling Plan shall be effected in all domestic networks no later than March 31, 2008.

<b>PREFIX</b>	<b>ACTUAL/FUTURE USE OF CODE</b>	<b>COMMENTS</b>
0-	Telephone Company Operator	Zero-Minus
0+	Person Paid Collect Special (PPCS) Call	Zero-Plus
00	(Not allocated)	Reserved for future use
01	International Person Paid Collect Special (PPCS) Call	
011	International Station to Station Sent Paid (SSSP) Call	
1+	<b>10-digit Station to Station Sent Paid (SSSP) Call</b>	

<b>CALL CASE</b>	<b>CUSTOMER DIALS</b>	<b>COMMENTS</b>
International calls (direct-dialled) Within World Numbering Zone 1 (NANP Area)	1 + Area Code + Subscriber Number	The Numbering Zone which represents the NANP area has been assigned Country Code 1 which is not to be confused with the 1+ prefix. WNZ1 has only one country code which is now the only single digit Country Code.
International calls (direct-dialled) Outside of World Numbering Zone 1	011+ Country Code + NDC Code + Subscriber Number	NDC = National Destination Code (the equivalent of the NANP area code)
International calls (operator-assisted) Outside of World Numbering Zone 1	01 + Country Code + NDC Code + Subscriber Number	Customer-Dialled Operator-Serviced (CDOS) Calls
Local Toll Free calls	1 + 888 + NXX -XXXX	N = digits 2 through 9 X = digits 0 through 9
<b>Domestic calls (direct-dialled)</b>	<b>NXX-XXXX</b>	Customer simply dials the seven-digit Subscriber Number, without any prefix.
Domestic call (operator-assisted)	0 + Subscriber Number	CDOS Calls
Operator (General)	0-	Operator-Dialled Calls. Customer simply dials "0", without any following digits. (May require interdigital timeout where Zero-Plus dialling is also implemented).

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