Office of Utilities Regulation

UNIFORM DOMESTIC DIALLING PLAN

Reconsideration (Phase 2) Decision



January 2009

DOCUMENT TITLE AND APPROVAL PAGE

DOCUMENT NUMBER: TEL 2009/02: DET/01

DOCUMENT TITLE:

Telecommunications Numbering Rules

Determination Notice

PURPOSE OF DOCUMENT

This document sets out the Office of Utilities Regulation's considerations and decisions in the second phase of the reconsideration of the Determination Notice on the Uniform Domestic Dialling Plan in Document No. Te12008/01, dated January 8, 2008.

RECORD OF REVISIONS

Revision Number	Description	Date
	Initial Document	January 22, 2009

APPROVAL

This document is approved by the Office of Utilities Regulation and the decisions therein become effective on January 26, 2009

On behalf of the Office:

George W. Wilson

Director General (Acting)

Director General (Acting)

Date

20 2309

TABLE OF CONTENTS

1.	INTRODUCTION4
2.	BACKGROUND5
3.	SUMMARY OF COMMENTS ON THE NPRM AND THE OFFICE'S RESPONSES
4.	PETITION ON ERROR OF FACT
5.	RECOSIDER ATION DECISION 28

1. INTRODUCTION

- 1.1 On January 28, 2008, the Office of Utilities Regulation ("the Office", "the OUR") received Cable & Wireless Jamaica Limited's (C&WJ) "Application for Reconsideration of OUR Determination Notice Titled 'Uniform Domestic Dialling Plan', Document No. Te12008/01, Dated January 8, 2008".
- 1.2 C&WJ's petition for reconsideration of the Determination Notice was made "in accordance with section 60 (5) (b) of the Telecommunications Act 2000 ("the Act")" and on the ground that the Determination Notice "was based upon material errors of fact and law".
- 1.3 C&WJ "in applying for the reconsideration of the Determination Notice... also [applied] for a stay of the implementation of the Determination Notice and any other proceedings or process directly or indirectly related thereto pending the OUR's reconsideration"
- 1.4 The Office has reconsidered the Determination Notice in two phases. In the first phase, the Office stayed the implementation of the Determination Notice and reopened the consultation on the Uniform Domestic Dialling Plan (UDDP), pursuant to C&WJ's claim of error of law. This decision was published in Document No. Te12008/07-Rcn/01 dated May 14, 2008 and titled "Uniform Domestic Dialling Plan, Reconsideration (Phase1) Decision". The Office reopened the consultation specifically for the purpose of allowing comments on unpublished responses that had been submitted by the Consumer Affairs Commission and the Consumer Advisory Committee on Utilities in relation to the Office's Notice of Proposed Rule Making on the UDDP. The closing date of the reopened consultation was May 27, 2008. The Office received no comments from stakeholders.
- 1.5 In the second phase which constitutes this document the Office reviews its decisions with due regard to the Consumer Affairs Commission's and the Consumer Advisory Committee's responses to the Office's Notice of Proposed Rule Making on the UDDP, and C&WJ's claim of error of fact.

2. BACKGROUND

- 2.1 In the Notice of Proposed Rule Making (Document No. Tel 2007/02) published on January 21, 2007, the Office set out the basis on which it proposed the establishment of a Uniform Domestic Dialling Plan that would provide a single dialling standard for domestic calls within Jamaica. Specifically, the Office proposed to require a standard 7-digit dialling pattern for **domestic Sent Paid Station to Station calls** within all and between any two networks without the use of a toll prefix such as the existing 1+ toll prefix. The office further proposed to require that carriers provided alternative means for toll indications on domestic calls to protect the interests of consumers. 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.
- 2.2 The Notice of Proposed Rule Making (NPRM) was also in part a response to complaints from local carriers who had objected to Cable & Wireless Jamaica's (C&WJ) requirement that its fixed network customers must dial the "1+" prefix before the telephone numbers when calling the customers on competing fixed networks. The non-incumbent carriers had also contended that the recorded announcement provided by C&WJ where the dialling of the prefix was omitted, was misleading in indicating that the calls being dialled were long distance calls; this anomaly was subsequently corrected by C&WJ at the intervention of the Office of Utilities Regulation.
- 2.3 The OUR's public consultation in the form of the NPRM was scheduled to conclude on **March 17**, 2007, but was extended to **March 28**, 2007 at the request of Columbus Communications Jamaica Limited.
- 2.4 The Determination Notice for the establishment of the Uniform Domestic Dialling Plan (UDDP) was approved by the Office on January 8, 2008, and the decision therein became effective on January 11, 2008. The Determination Notice prescribed six policy outcomes:
 - Elimination of variations in dialling patterns for domestic Station-to-Station Sent-Paid¹ 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 and thereby the establishment of

¹ 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.

- 2. dialling parity for all subscribers for Domestic Station-to-Station Sent-Paid calls within Jamaica.
- 3. Elimination of the 1+ prefix, as a toll indicator for Domestic calls, and in that context, the provision for
- 4. mandatory uniform domestic dialling across all fixed and mobile networks in Jamaica.
- 5. Use of the 1+ prefix to differentiate between 7-digit and 10-digit dialling.
- 6. The provision of a "toll indicator" for consumer protection, while reducing the number of dialled digits for domestic calls.
- 2.5 Paragraph 2.6 of the Determination Notice stated: "...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 [Consumer Affairs Commission] in a separate consultative exercise".
- 2.6 However, C&WJ expressed concern "that consultation with two bodies, the Consumer Affairs Commission (CAC) and the Consumer Advisory Committee on Utilities (CACU)... was not treated with the established procedures applied to consultation with other stakeholders" in that "the OUR did not circulate the responses from these two bodies to the other stakeholders, nor was there the concomitant opportunity to respond to the submission". That concern formed the basis for C&WJ's claim of error of law. The Office responded to the claim by reopening the consultation on the UDDP to provide stakeholders opportunity to respond to the submissions from the Consumer Affairs Commission and the Consumer Advisory Committee on Utilities.
- 2.7 In Phase 1 of this Reconsideration process, the Office submitted that the omission of consideration of the CACU's comments on the UDDP NPRM was due in part to an oversight (at the time when the Office sought "a consumer perspective, on the proposal to institute the UDDP") and partly to the fact that the CACU's comments document was dated April 30, 2007 and presented to the OUR over a month after the closing date of the consultation. The Office further submitted that "...the established procedures applied to consultations with... stakeholders" normally omitted late stakeholder submissions from consideration, regardless of the content or origin of such submissions.
- 2.8 Also in phase 1 of this Reconsideration, the Office affirmed that notwithstanding the open and public declaration, in the Determination Notice, of its consultation with the CAC it believed that the appropriate response to any reasonable appearance of an aberration from the principles of fairness in that matter was to

reopen the consultation and allow for stakeholder comments on the CAC's responses to the NPRM. The Office stated further, for the avoidance of doubt, that no stakeholder submissions other than those mentioned in the Determination Notice and those of the CAC and CACU, as mentioned above, were made to the Office in relation to the establishment of the UDDP

2.9 C&WJ also presented several arguments under the headings, "Establishment of Alternative to 1+ Dialling", "establishment of Termination Rates", and "Lack of Supporting Evidence", to support its claim of errors of fact.



3. SUMMARY OF COMMENTS ON THE NPRM AND THE OFFICE'S RESPONSES

Consumer Affairs Commission (CAC)

- 3.1 The Office considers it appropriate to repeat, in sub-paragraphs (a) (c) hereunder, the CAC's comments that were summarised in paragraphs 3.24 3.26 of the Determination notice, and makes no further response to the commission's contribution:
 - (a) 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.
 - (b) 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 asserted: "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'".
 - (c) 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".

Consumer Advisory Committee on Utilities (CACU)

- 3.2 The CACU's comments are reproduced below, partly in order of relation between the issued raised, and followed by The Office's responses
- a) We are unconvinced that dialing parity stimulate competition or investment, as companies make decisions primarily based on the market and their ability to profitably operate a business.

Office Response:

3.4 The Office did not seek to make the case that "dialling parity [in and of itself] stimulates competition and investment". That conclusion (which was also earlier expressed by C&WJ in its response to the NPRM) by CACU obviously was drawn from paragraph 2.3 of the NPRM which stated:

"The Office holds the view that, notwithstanding the current limited competition in the local fixed line service markets and concomitant barriers to entry, with new technologies and innovative product offerings, the local fixed network service markets may become far more attractive to investors in the medium term. Thus, as the delivery of these services continues to be dependent on the use of diallable telecommunications numbers, dialling parity among competing carriers becomes a competitive necessity. Dialling parity in this context is to be understood to mean: equal dialling access provided to customers on all networks to reach customers on other networks. That is, no additional codes or numbers beyond the basic 7-digit telephone number are required to reach the customers of other service providers in the national network".

- 3.5 In the forgoing quotation "new technologies and innovative product offerings" are allude to as stimulants for "competition and investment". Dialling parity is deemed an important supporting mechanism as it absence presents a potential threat to fair competition.
- b) The CACU, in consulting consumers, has not found any evidence to support the claim that the 1+ prefix for its [C&WJ's] "fixed to 3rd party fixed" calls, has negative competitive consequences for competing service providers.
- 3.7 g) Our consultations have revealed that customers want to know beforehand, that they are dialing outside of their network, given the wide disparity in mobile telephone rates. Additionally, we have seen where the new entrants (even those offering fixed wireless) have proposed rates which we believe are not sustainable over the short to medium term. With this opinion, we support the maintenance of the 1 + dialing across networks. [Emphasis by the OUR]

Office Response:

3.8 Unfortunately, the Office was unable to obtain any empirical information regarding the CACU's consultations for further appraisal of the consumer views from the said consultations. However, it is instructive to note, "...the wide disparity in mobile telephone rates" mentioned in the statement above had similar implications for both fixed-line and mobile customers for cross-network calling but this did not preclude C&WJ's discontinuation of the use of the 1+ prefix on its Mobile network, for domestic calls.

3.9 f) Mobile customers are already benefiting from direct dialing, regardless of networks and the difference in charges. The fixed Line customer (including wireless) therefore, should continue to be given the option to dial or not dial.

Office Response:

- 3.10 There is an unsettling logic of equity in this argument if, as it seems, the CACU is contending that: mobile customers are "benefiting" from the non-requirement of 1+ dialling (the Office's interpretation of the CACU's phrase "benefiting from direct dialing") though the existing differences in mobile charges for calls across networks should require otherwise, therefore 1+ dialling should be retained for fixed-line customers to allow them too, some benefit of sorts.
- 3.11 But more importantly, there is a tacit declaration in the CACU's argument that the premise and circumstances on which the call for the retention of 1+ dialling for fixed-line customers is based, apply as well to mobile customers (See Table 1).
- 3.12 i) It is useful for customers wishing to call other networks from their own service to know when higher rates apply. The 1+ dialing indicates to consumers that they will be making a call which attracts a higher rate as opposed to a local call. The entire island of Jamaica has one area code, which makes it difficult to know whether the call is long-distance or not.
- 3.13 k) The higher rate mobile customers are at a distinct advantage than the lower customer. All customers should therefore be given the same indication to make the appropriate decision and to offer choice. In short, customers must be provided with the necessary and adequate mechanisms so that they may adjust their consumption based upon necessary information, i.e. price, which 1+ dialing provides to callers. [Emphasis by the OUR]

Office Response:

3.14 The CACU's latter two assertions above are considered against the sample retail rates extracted from the respective service providers' websites and presented in the following table.

Table 1. Comparison of Selected On-net and Off-net Retail Rates

	то			
FROM	ON-NET	OFF-NET	Price Difference	
	C&W Fixed	3 rd Party Fixed	PD	
C&W Fixed	0.99	2.70	1.80	
	C&W Fixed	All Mobiles	PD	
C&W Fixed	0.99	7.00	6.01	
	Flow Fixed	Other Fixed	PD.	
Flow Fixed	0.00	2.50	2.50	
	Flow Fixed	Mobile	PD	
Flow Fixed	0.00	9.50	9.50	
	C&W Mobile	Other Mobiles	PD	
C&W Mobile - postpaid	4.00	12.00	8.00	
	C&W Mobile	Other Mobiles	PD	
C&W Mobile - prepaid	8.00	12.00	4.00	
	Digicel	Other Mobiles	PD	
Digicel - prepaid	10.00	17.70	7.70	
	Digicel	Other Mobiles	PD	
Digicel - postpaid	5.00	15.00	10.00	

3.15 The CACU's position on 1+ dialling seems most unequivocal in those statements which say, in short, "All Customers [both mobile and fixed-line] should... be given the same indication [in order for them] to make the appropriate [calling] decision..." [and] "must be provided with the necessary and adequate mechanisms..., which 1+ dialing provides, [for that enabling]".

- 3.16 However, C&WJ does not support a reversion to 1+ dialling for domestic calls on its Mobile network claiming: "the Office is well aware that mobile networks do not have the history of the fixed network in Jamaica. For many years C&WJ fixed was the Universal Service Provider in Jamaica and it was expected that the Company would protect customers and even now the expectations of C&WJ fixed are greater than for the mobile networks. Therefore it is should be of little surprise than none of the unregulated networks, like the mobile networks, including bmobile use '1+' dialing on their networks". In essence, C&WJ has advocated for protection for one set of its customers while asserting that the others, who practically are under similar circumstances do not require such protection, and further rationalizes the same 'non-protection' by other operators.
- 3.17 But it is quite evident that the CACU's advocacy for the retention of 1+ dialling targets not just C&WJ's fixed-line customers (the only group currently allowed use of the 1+ prefix for domestic 7-digit dialling) who represent less than 12% of the general telephone subscriber population, but the entire subscriber population both fixed-line and mobile. In the word of the CACU, "The higher rate mobile customers are at a distinct advantage..."
- 3.18 Nonetheless, whilst the Office appreciates the CACU's singular perspective on equal treatment for all customers as regards the matter in hand, it is cognizant of the overriding need for the more objective and pragmatic consideration of the prevailing local circumstances as they relate to existing regulatory provisions, network arrangements and broad industry preferences. For instance, in the non-C&WJ fixed network and the mobile network environments where the 1+ prefix is not employed and alternatively no post-dial toll notification is provided on domestic toll calls, there were no petitions, in response to the NPRM, to change or alter those arrangements and thus it seems reasonable to conclude that there is no significant expression of customer dissatisfaction, if any, with them. important consideration is the fact that mobile numbers are sufficiently distinguishable from fixed numbers, as provided by the National Numbering Plan allocation scheme, giving C&WJ's fixed line customers a broad indication that a higher charge will be incurred on calls to those numbers. Well over 80% of the national telephone subscriber populations are mobile subscribers.
- 3.19 The ultimate question to be considered, therefore, would be whether it would be sensible to institute a change to 1+ dialling for the nearly 90% of total fixed and mobile subscribers, which are outside of C&WJ's fixed network (and where C&WJ contends 1+ dialling is not desirable), rather than to discontinue 1+ dialling for the significantly smaller remaining population with the option of a post-dialling toll indication for them.

- 3.20 The Office concurs with the view of the Consumer Affairs Commission that it had not been convincingly argued "that... '1+' dialling is necessary" and agreed "that indeed '1+' dialling should be discontinued in the instances under consideration", and more so as a "...feasible alternative for alerting consumers to higher call charges has been proposed..."
- 3.21 h) The proposed 'toll indication' is of concern especially if the time allotted for that information is included in the call time.

Office Response:

- 3.22 The 'toll indication' would be given during the 'set-up' stage of the call, that is, before the called party is signalled, and answers, and billing commences. So the time allotted for the information would not be charged to the caller.
- 3.23 Depending on its content, a recoded announcement as the toll indication could significantly increase call set-up time for each call dialled. Alternatively, a tone within the duration range of common telephone tone signals of is not likely to have such effect.
- 3.24 Nevertheless, the Office regarded it as crucial to consider whether it would be reasonable, in the circumstances, to require an operator to inform its customers during call set-up that they would 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 a disadvantage.
- 3.25 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. There are intangible and tangible costs to both the caller and the network provider for such redials.
- 3.26 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 before the called party answers or to continue on the call.
- 3.27 However, the '1+ dialling' problem may loom larger than reality if it is framed more in the context of a customer's choice between making and not making a call than as a customer's decision regarding the limiting of talk time, which, perhaps, is the more probable premise in the present market realities.
- 3.28 m) Finally, the CACU is of the view that the required infrastructure to accept UDDP is not currently in place and as such, the UDDP should be delayed until then, while continuing with I + dialing format.

Office Response:

- 3.29 Network considerations associated with the removal of 1+ dialling appear to be straightforward. The switching facilities which receive and process customer-dialled digits and complete calls across networks are able to accept and properly interpret 7-digit destination numbers, for other networks, dialled without the 1+ prefix, and route the calls accordingly, and could accommodate almost any uniform dialling plan.
- **3.30** Finally, the Office notes that the CACU has signalled a willingness to accept the implementation of the UDDP notwithstanding the Committee's expressed preference for an all-network employment of 1+ dialling for 7-digit domestic Sent Paid Station to Station

4. PETITION ON ERROR OF FACT

- 4.1 At paragraphs 2.1 2.5 of the NPRM the Office outlined two reasons for the consultation on and subsequent establishment of a Uniform Domestic Dialling Plan as follows:
 - "2.1 ...in part, the Office's response to complaints from local carriers who have objected to Cable & Wireless Jamaica's (C&WJ) requirement that its customers must dial the "1+" prefix before the telephone number when calling... customers on other fixed networks.
 - 2.4 The dialling plan which existed under the telecommunications monopoly regime, that is, prior to the advent of the telecommunications liberalization policy in March 2000, has largely remained de facto in force up to the present time. 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.
 - 2.5 ...this NPRM may be regarded as a first step in relation to the matter of the National Dialling Plan."

4.2 The NPRM further stated:

- "2.3 The Office holds the view... that, with new technologies and innovative product offerings, the local fixed network service markets may become far more attractive to investors in the medium term. Thus, as the delivery of these services continues to be dependent on the use of diallable telecommunications numbers, dialling parity among competing carriers becomes a competitive necessity. Dialling parity in this context is to be understood to mean: equal dialling access provided to customers on all networks to reach customers on other networks. That is, no additional codes or numbers beyond the basic 7-digit telephone number are required to reach the customers of other service providers in the national network [as specifically stated, for domestic Sent Paid Station to Station calls].
- 3.2 ...Importantly, however, the 1+ prefix will be retained for the dialling of calls to domestic Toll Free numbers (in the format 888-NXX-XXXX)...
- 2.2 In addressing the dialling and competitive concerns articulated by carriers and service providers [and considerations for revising the National Dialling Plan], the Office looks at existing and proposed North American Numbering Plan (NANP) numbering and dialling

facilities and pertinent developments in the wider global industry. Importantly, the interests of the customer are made a major focus in the discussions. All of these considerations afford appropriate explanation or reinforcement of numbering knowledge that, together with an understanding of the relevant statutes, is necessary for establishing the context for a proper understanding of the subject issues and the required stakeholder consultation/participation and decision-making.

- **4.3** Thus, the Office discussed a broad range of issues relating to:
 - 1. User Friendly Numbering Arrangements paragraphs 5.2 5. 7
 - 2. Numbering Plan and Dialling (Plan) Procedures paragraphs 5.8 5.13
 - 3. Local Dialling vs. National Dialling [in NANP and non-NANP regions] paragraphs 5.14 5.32
 - 4. Dialling Principles for a Competitive Market paragraphs 5.33 5.38
- 4.4 Having considered the various views articulated by the respondents to the NPRM and other relevant facts, the Office set out, in paragraph 4.3 of the Determination notice, eleven (11) summary considerations that would guide its final decision for the establishment of a Uniform Domestic Dialling Plan. They are repeated hereunder for emphasis: "
 - 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 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 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 3rd 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 telecomm 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 speech²), have important advantages and disadvantages as weighed against the following criteria:
 - **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.

² ITU-T Recommendation E.182 - Application of Tones and Recorded Announcements in Telephone Services

- 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 recoded 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)"
- 4.5 In its petition for reconsideration of the Determination Notice, C&WJ contends, "the alternate means of advising customers is so crucial to the whole debate on the abolition of 1 + dialing, that it must, of necessity, be agreed and form a part of any Determination Notice seeking to abolish 1 + dialing in order for the OUR to discharge its function under section 4(1)(c) of the Act to 'promote the interests of customers, while having due regard to the interests of carriers and service provider'.

C&WJ cannot go forward with a determination that ignores the needs of its customers. Any provision to cease using 1 + must institute other measures to protect customers. It is not good enough for the OUR, for the sake of expediency, to say that the implementation of UDDP will not be detained by the need to address customer concern issues as contained in determinations 7 and 7.1. Indeed in the consultation the Office seemed resolute in finding a solution to protect customers".

- **4.6** The Office resolved the question of an "alternate means of advising customers" on the following considerations:
 - (a) Close to 90% of existing telephone subscribers, including C&WJ's Mobile customers, dial off-net domestic calls without a toll prefix and where such calls are considerably more expensive that on-net calls.
 - (b) The Office is not aware of any demand from those consumers for, or any expressed intention or desire on the part their respective service providers to introduce, an "alternate means of advising customers"
 - (c) Only C&WJ has expressed any desire for an "alternate means of advising customers", and this only for its fixed line customers where the vast majority of calls involved are fixed to mobile calls, and as provided in the National Numbering Plan, pursuant to Section 8 (3) (c) of the Telecommunications Act 2000, broad indications of price in this context are clearly given by numbers, which lessens the case for a toll prefix and by extension, for an "alternate means of advising customers". Moreover, it would serve no rational purpose to impose this requirement of an "alternate means of advising customers" on C&WJ for its Mobile customers and on the other operators, who have not expressed a desire for it, and whose customers, to the best of the Office's knowledge, have not demanded it.
 - (d) The Office believes "Policies that treat competitors differently can bias customers' choices...3". On that basis and in the context of considerations immediately above at (a) (c), the most reasonable position to adopt, in the Office's view, is to not require an "alternate means of advising customers" for any operator but to allow any operator desiring it, to implement such a facility at their discretion, and based on technical guidelines specified by the Office as, indeed, the Office had proposed the provision and preservation of a "toll indicator" in the interest of the customer.

³ Source: Presentation "Administering Fair Competition in Telecommunications" by the Executive Director of the Fair Trading Commission, at the OUR's Telecommunications Forum held at the Jamaica Conference Centre on July 26 to 27, 2001

- (e) Considered against the afore-mentioned criteria used to evaluate the suitability of the two proposed optional notification mechanisms, a recoded announcement and a tone signal, an audible post-dial tone seems to be the more advantageous "alternate means of advising customers"
- 4.7 It is clear therefore, that C&WJ's assertion that the Determination "...ignores the needs of its customers, [and the concomitant suggestion that] the provision to cease using 1 + [does not] institute other measures to protect customers", are without plausible foundation.
- 4.8 C&WJ, in its various pronouncements, seemed to be suggesting that only its fixed line customers, which represent less than 12% of the national subscriber population, desire or require "protection", the company having declared, in its response to the NPRM and restated in its petition for reconsideration, "...mobile networks do not have the history of the fixed network in Jamaica. For many years C&WJ fixed was the Universal Service Provider in Jamaica and it was expected that the Company would protect customers and even now expectations of C&WJ fixed are greater than for the mobile networks. Therefore it is should be of little surprise than none of the unregulated networks, like the mobile networks, including bmobile use '1 + ' dialing on their networks".
- 4.9 C&WJ had also stated in the context of the declaration above, that it "believes that it has to give its [Fixed] customers some indication that they will be making a call [to another Fixed Network] that is at least 300% more expensive than the domestic call charges that they are accustomed to. [And] [d]ialing the "1" prefix achieves this".
- 4.10 The truth here, however, is that making a call to other fixed networks was "at least approximately 200% more expensive than the domestic call charges" for on-net calls, and not "300%" as claimed by C&WJ, and C&WJ should therefore explain why it does not believes that it has to give its [post paid mobile] customers some indication that they will be making a call that is at least [200%] more expensive than the domestic call charges that they are accustomed to [see Table 1].
- 4.11 C&WJ further argued: "Each fixed network operator is dominant on its own network for call termination. Columbus Communications (Merit), Gotel, ODJ and PTJ are all dominant on their own network for fixed call termination. As such they can set any call termination rate.
- 4.12 C&WJ learned this painful experience with fixed to mobile calls. As the Office is aware the Fixed to Mobile (FTM) retail rate that was in the market for at least two (2) years, set by Digicel, was J\$12. Customers did not recognize that the call charges were so high and moreover customers believed that C&WJ had set the retail rate while Digicel refused to publicly take responsibility for setting the rates. The result was that thousands of customers, unable to pay their bills, churned off the C&WJ network. 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... Therefore C&WJ maintains that 1+ dialing is necessary to protect its customers..."

- 4.13 C&WJ's reasoning in the latter assertion is seriously flawed in presenting a false justification for its retention of 1+ dialling on its fixed network, in the context in question. Here C&WJ is treating as the cause of a thing what is really not the cause thus making its argument patently fallacious (non causa pro causa). The Fixed to Mobile issue that C&WJ relied upon in that argument had become a major public issue through a news article published in the Daily Observer newspaper on July 17, 2002, under the caption "Phone firms blame OUR for confusion in cell numbers". The problem came to the fore when Digicel was assigned telephone numbers in the '8XX' number range with C&WJ and the latter's fixed network customers called 8XX numbers presumably in ignorance of the operator, and by extension price, distinctions in the central office codes.
- 4.14a What was critical here, however, was that the problem was not that the Fixed network customers were without a mechanism to indicate that toll charges would apply on their calls to the Digicel 8XX and existing 3XX and 4XX numbers, for indeed, they had to dial the 1+ prefix to make those calls, as well as those to C&WJ's 8XX Mobile numbers. Thus C&WJ's conclusion, "Therefore C&WJ maintains that 1+ dialing is necessary to protect its customers...", in that argument, is based on a false premise and therefore is invalid. Besides, in those circumstances, the problem would have occurred with or without the 1+ prefix.
- 4.14b The Office submits that any claim that C&WJ now makes regarding a historical necessity to retain the use of the 1+ prefix for 7-digit domestic calls, or a need for an "alternate means of advising customers", should be assessed against the substance of its written correspondence to the Office, dated October 17, 2003, on the subject matter "Simplified Access to International and Local Calls".
- **4.14c** In that correspondence, C&WJ outlined its intention "to simplify the dialing plan it currently uses by replacing it with a two-tiered dialing plan, which has become the defacto standard in the local telecommunications industry and to which Cable & Wireless intends to align the Pubic Switch Telephone Network (PSTN). [Underline by the OUR]

That is:

- Seven digit dialing will be used for all intra island calls, including mobile calls
- 1+ will prefix all international numbers"

The PSTN presently has four dialing formats as shown in the following table:

Dialing format	Call Types Supported
7Digit	Domestic Intra Parish
1+ 7Digit	Domestic Toll/Mobile Terminating
113+ICAS+IN	International Calls
*96+PIN+IN	International Calls it codes respectively. IN = International Number

The new plan was scheduled to "be effected in the PSTN by October 31, 2003", fourteen (14) days after notification to the Office, and with no provision for an alternative toll indicator to be used, in lieu of the 1+ prefix, for "Domestic Toll/Mobile Terminating".

4.15 C&WJ contends further in its petition for reconsideration:

The NPRM speaks to number portability and NPA growth, overlay and exhaust as being facilitated by a uniform dialing plan. C&WJ does not disagree that that is so. However in NPA growth, overlay and exhaust and number portability, the UDDP is only one aspect of the process which can be addressed simultaneously with all the other issues.

4.16 The Office considers the statement to be a misleading, if not erroneous, representation of facts, on the part of C&WJ. It is not clear whether C&WJ is suggesting in the statement, that NPA exhaust is facilitated by a uniform dialling plan. Neither is the 'concept' a rational one. The other concepts in this statement regarding the facilities of a uniform dialling plan were not expressly stated as such in the NPRM and quite probably were deduced by C&WJ from the general discussion in the NPRM on "Local Dialling vs National Dialling" and in particular from a comparison of closed and open dialling plans in paragraphs 515 – 518 which dealt with non-NANP countries (here is where the single mention of number portability in the NPRM is found). The referenced comparison of dialling plans is reproduced below:

Austria Belgium Costa Rica Czech Republic Denmark Ethiopia Finland France Germany Greece Hong Kong Ireland	Open Closed Closed Closed Closed Closed Open Closed Open Closed Closed Open Closed Open	Luxembourg Netherlands Norway Poland Portugal Qatar South Africa 2007) Spain Sweden Switzerland United Kingdom	Closed Open Closed Closed Closed Closed Closed Closed Open Closed Open Closed Open
Italy	Closed		

[NPRM Table 6] Comparison of open and closed dialling plans

DIALLING PLAN	DESCRIPTION	ADVANTAGES	
Open	separate local and trunk (long distance, national) dialling procedures, varying lengths of codes or subscriber numbers or of both	provides shorter numbers for local calls the shorter local number helps to reduce misdialling	
	one in which different dialling arrangements for local and long distance telephone calls apply	keeps geographic area identities	
Closed	single dialling procedure (no trunk prefix), usually single uniform number length	has no need for trunk (toll) prefix (one digit less on national calls) has a uniform dialling procedure for all calls allows higher capacity utilization makes number portability easier t introduce is the simple way to expand a number plan	

- 4.17 The stated characteristics/advantages of the dialling plans in the comparison are generalizations and care must be taken in applying them; it is fallacious to apply a generalization to individual cases that it does not properly govern. There is no suggestion in the facts presented, that every form of a closed dialling plan necessarily yields all the advantages listed.
- **4.18** Suffice it to say, however, the Office's decisions on the characteristics and purpose of the Uniform Domestic Dialling Plan are not based on the concepts to which C&WJ referred.
- **4.19** Under the heading "Establishment of Termination Rates", C&WJ states:

"At paragraph 3.4 [of the Determination Notice] the OUR states that

'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 rate' [Emphasis by the OUR]

It is true that the other fixed line operators do set their termination rates reciprocal to C&WJ's. However C&WJ does not set the termination rates. The rates are set and approved by the OUR"

C&WJ concludes that the OUR's statement constitutes "an error of fact"

- **4.20** The Office acknowledges that its statement could incorrectly force the reading of C&WJ's role in the setting of termination rates as going beyond the provision of cost information inputs to the process. This however is not what the Office intended.
- **4.21** C&WJ stresses "It should be clear that the OLOs [Other Line Operators] can, if they wish to, set a lower rate than the C&WJ approved rate" [The Office believes C&WJ meant: a lower rate than that approved for C&WJ], and thus the essential point to be taken from the Office's statement is that, similarly, C&WJ can, if it wishes to, reduce its retention charge to lower the retail rate.
- **4.22** Nevertheless, the Office hastens to say that the statement in question was not material to any of its decisions on the establishment of the UDDP.
- **4.23** C&WJ "...also argues that it is a material error of fact that the OUR based its Determination in part on at least two examples, for which it does not have evidence to support its rguments". [Emphasis by the OUR]
- 4.24 Example (1) "In support of a quote from a document, the OUR speculates that the introduction of a Single National Rate (SNR) by C&WJ must have resulted in increased domestic traffic, since it eliminated the need to dial 1 +. Therefore, according to the OUR, C&WJ benefited from the change in dialling, which the Office declares as a benefit it has separately identified apart from reduced prices. In the absence of statistical data to support its allegations, the OUR has relied on speculation and conjecture to support a very important decision. This is unacceptable".
 - **4.25** This "example" pertains to the Office's response to C&WJ's request, in its consultation comments, for assurance regarding cost recovery. However, C&WJ's paraphrasing and presentation of a single argument from the Office's response obscures the Office's viewpoint. Below is the Office account of this issue. In paragraphs 4.46 and 4.29, the contextual connotation of bolded text is given in a square bracket immediately after the words:
 - 4.26 In its comments on the UDDP NPRM, C&WJ said in conclusion: "In the event that [if it should happen to be that] the OUR determined [made a decision] to

abolish I+ dialling in Jamaica, C&WJ seek assurance from the OUR that... (iii) The Company will be allowed to recover all cost associated with the elimination of I+ dialing"

- 4.27 The Office responded in the Determination Notice to say: "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 it network where that course has been taken and where the scope of work undoubtedly was 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".
- **4.28** The Office, in that statement, set the basis on which it could properly consider C&WJ's cost-recovery petition, and thus neither granted nor denied it. C&WJ has had adequate time within which to provide the relevant information and has not done so or given any indication of an intention to do so. In any case, it is clear that a decision on cost-recovery was not a pre-condition for the decision to eliminate of 1+dialing.
- 4.29 Continuing, the Office made it clear that the issue and discussion in this particular response were not a basis for the Office's decision to discontinue 1+ dialling as proposed, by stating: "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". The Office further stated, to merely point, antithetically, to **probable** positive outcomes of the removal of the 1+ prefix, against the **probable** negative outcomes C&WJ referred to in its response to the NPRM including, "(i) The Company's customers... [being]... adversely affected by the elimination of 1+ dialing; (ii) The Company's bad debt... [increasing]... due to the elimination of 1+dialing":

"But, it is not unreasonable to **suppose** [i.e., take as a possibility] 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] change⁴'. It is **equally reasonable** [or, similarly not unreasonable] to **conclude** [i.e., presume; suppose; infer] that the company's removal of the 1+ prefix on inter-parish calls, for example, resulted proportionally in increased domestic traffic on its fixed network (and for reasons not **necessarily** [such as must be] associated with reduced rates) and that the company therefore benefited from this change"

⁴ Numbering Trends - A Global Overview | Source: ITU/Antelope Consulting (2005) |

- **4.30** This latter part of the response is the gravamen of C&WJ's contention. However, the Office had not made any declaration, in this matter, as though it were a proven fact, but rather, on the premise of a relevant, industry-accepted principle, put forward the probability of particular outcomes, as the parsing of the statement demonstrates.
- 4.31 The Office submits that the issue and discussion in question clearly were not a basis for, and did not in any other way materially influenced, the Office's decision to implement the Uniform Domestic Dialling Plan, or any other decision associated therewith.
- 4.32 Example (2) "In its response to Reliant, at paragraph 3.12, the OUR quotes yet another document which makes reference to the possibility of a major service provider allotting its competitors sixteen (16) digit numbers while its own customers are allotted seven (7) digit numbers and how unattractive it would be for any customer to have to dial sixteen (16) digits to get to another customer. The reality, in Jamaica, is that the OUR assigns telephone numbers. All operators, including C&WJ, are allotted seven (7) digit numbers. The situation referenced in the quote has never occurred in Jamaica. The practice of using the prefix '1 +' before more expensive calls is however well established in the North America Numbering Plan".
- 4.33 Here, and in the first "example", C&WJ refers to and interprets the Office's quotation from a document, in a manner that clouds the authority and implications of those quotations (from publications of the ITU, Antelope Consulting, the WTO) in the mind of the reader. To clarify the matter, the Office reproduces, below, the full text of the Reliant comment and the Office's response:

"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 l+ should be eliminated for all types of 'on island' calls between networks'.

Office Response:

- The duly cautious sentiment expressed by Reliant is corroborated in the 3.12 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 Services⁵], 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. '6"
- 4.34 It is quite evident that the Office had limited its response to Reliant's comments, to simply drawing attention to a corroborating statement on similar concerns by the WTO (World Trade Organization). The WTO offered the dialling scheme illustration as a **practical equivalent** of the market anomaly with which the organization was concerned. Likewise, a number allotment and dialling arrangement such as illustrated in the WTO hypothetical example is the **practical equivalent** of the industry practice to which Reliant alluded, in that it has a similar potential adverse competitive impact.
- 4.35 The Office is therefore of the view that either C&WJ failed to comprehend the foregoing, judging from its assertion, "The reality, in Jamaica, is that the OUR assigns telephone numbers. All operators, including C&WJ, are allotted seven (7) digit numbers. The situation referenced in the quote has never occurred in Jamaica", or was again being frivolous in citing (with an erroneous interpretation) the Office's response to flow's comments as a basis for the Determination and thus an "error of fact".

⁵ 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.

⁶ WTO Staff Working Paper TISD9801.WPF - Dealing with Monopolies and State Enterprises: WTO Rules for Goods and Services.

5. RECOSIDERATION DECISION

- 5.1 Consequent upon the foregoing discussions analyses and conclusions, the Office makes the decisions below in accordance with Section 60, subsections (6) and (7).
- Dialling Plan prior to the establishment of an alternative toll notification mechanism and consequently rescinds the previous Determination 6.0. The Office is persuaded that the adoption of an alternative toll notification mechanism should, as opined by C&WJ, "form a part of any Determination Notice seeking to abolish 1 + dialing". This approach will also immediately satisfy the expectation of the Consumer Affairs Commission that a facility will be provided to ensure "that consumers are not taken by surprise when higher than normal call charges appear on their bills". The newly added Determination 5.0 (Determination # 5.0 was inadvertently omitted in the Determination Notice Document No. Te12008/01) establishes the alternative toll notification mechanism.
- **5.3** Accordingly, the Office also modifies the Determination Notice to:
 - 1. rescind Determination 3.1 and renumber Determination 3.2 as 3.1 and revise the wording to this Determination to change the nomenclatural reference to the alternative toll notification mechanism
 - 2. revise the wordings to Determinations 4.0, 7.0 and 7.1 to change the nomenclatural reference to the alternative toll notification mechanism.
 - 3. replace the subject matter of Determination 6.0
- To assist service providers in ensuring their readiness for compliance with the Office's determinations, the Office is establishing a date certain as the effective date for implementation of the UDDP. Accordingly, the Office revises Determination 8.0.
- 5.5 The Office confirms Determinations 1.0, 2.0, 2.1, 3.0 and 9.0.
- 5.6 Mobile and Fixed-Line service providers who currently do not employ a toll notification indicator in their network, should notify the Office by January 31, 2009 of any intention to employ such an indicator as per (the newly added) Determination 5.0.

5.7 Modified Determinations

Determination 3.1:

The toll warning indication 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 indication 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 5.0:

An industry standard for a toll warning indicator shall be adopted consistent with the parameters given below, and applied in the domestic telephone network in lieu of the 1+ Prefix:

NAME: Toll Notification Tone

DEFINITION: A tone advising the caller that the call is being processed and that toll charges will be applied

TECHNICAL CHARACTERISTICS: This specification establishes the values of cadences, frequencies and levels for the audible tones signals be applied within the network. These requirements for the tones signal components of the Toll Notification Tone correspond with those set for the first and second tone signals of the Special ITU-T Information Tone specified in Recommendation E.180/Q.35.

Tone period - The tone period shall consist of three successive tone signals, each lasting for 330 \pm 70 milliseconds. Between these tone signals there may be a gap of up to 30 milliseconds.

Frequencies - The frequencies used for the three tone signals shall be: 950 ± 50 Hz; 1400 ± 50 Hz; 950 ± 50 Hz, sent in that order.

The Office shall allow the application of the Toll Notification Tone on a permissive basis rather than a mandatory basis, in accordance with Determination 3.0.

Determination 6.0:

Service providers are required to appropriately notify their customers, at least two (2) weeks in advance of the effective date, of the implementation of the Uniform Domestic Dialling Plan in their network.

To the extent that it is practical and reasonable service providers employing the Toll Notification Tone for the first time should provide their customers with an audible sampling of the tone, in the advance notification, so that when they hear it on a normal call, they interpret it to mean that toll charges will be incurred on the call. The purpose of this notification is to prevent confusion on the part of callers who are not knowledgeable about the tone

Determination 7.0:

The non-availability of the Toll Notification Tone for use in lieu of the 1+ prefix shall not be a barrier to the implementation of the Uniform Domestic Dialling Plan in any local network.

Determination 7.1:

The availability of the Toll Notification Tone 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, 2009.

END OF DOCUMENT