

CABLE & WIRELESS JAMAICA'S RESPONSE TO
A CONSULTATIVE DOCUMENT ON
THE JAMAICAN NATIONAL NUMBERING PLAN

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CABLE & WIRELESS JAMAICA'S RESPONSE TO
THE JAMAICAN NATIONAL NUMBERING PLAN
A CONSULTATIVE DOCUMENT

INTRODUCTION

Cable & Wireless Jamaica (C&WJ) welcomes the opportunity to respond to the Consultative Document on the Jamaican National Numbering Plan (JNNP). This Consultation has been necessary for some time now in order to establish regulatory certainty in the administration of the national numbering resources.

C&WJ agrees that the OUR need not reinvent the wheel since Jamaica is a part of the North American numbering Plan (NANP). Through the Industry Numbering Council (INC), sponsored by the Alliance for Telecommunications Industry Solutions (ATIS), several guidelines have been developed to govern the use of numbering resources in the NANP. The OUR has referenced these guidelines in the JNNP. These guidelines are very useful to the industry, nevertheless the OUR is encouraged to adapt the guidelines, where possible, to make them even more beneficial to local market conditions. A general observation is that the terminologies that are used in the guidelines, particularly on the forms, are unfamiliar in Jamaica.

Reference is also made to the 809 legacy that was inherited by Jamaica. Prior to 1996, Jamaica shared the 809 Numbering Plan Area (NPA) with several other Caribbean islands. Codes were assigned to Jamaica, as with other Caribbean islands, that were available, but not necessarily in conformance with the guidelines for the NANP. C&WJ urges the OUR to consider this historical legacy in its Determination on the JNNP.

C&WJ draws the OUR's attention to the fact that apart from the Central Office Code (NXX) Guidelines, all the NANPA guidelines govern the numbering resources allocated to the Public Switched Telephone Network (PSTN). The guidelines do not treat with mobile services. In the USA, the guidelines for the fixed network's numbering resources are administered by NANPA and numbering resources, for mobile services, are directly regulated by the Federal Communications Commission (FCC).

It is recommended that the OUR host a workshop in order to educate the industry on the guidelines referenced in the JNNP. Number administration is an arcane and obscure aspect of the provision of telecommunications services and more interest would be generated in the matter if the industry were educated.

Following are comments on the issues raised in the JNNP and the response to the questions asked by the OUR, in the order presented in the JNNP.

CHAPTER 3

The Current Status of Numbers

- 3.2 The 55X – 59X range is not currently allocated to POTS. Only one code in this range, that is 563 is being used for any service and that is for Personal Number Service (PNS). This range, other than the 563 NXX, is therefore available for growth and not POTS.
- 3.4 The OUR has overstated the total numbers allocated for geographic service, by approximately 500,000 with the inclusion of the 55X – 59X range.
- 3.6 The OUR is requested to define the term, “low fill rate”. Reference is made to section 4.3.1 of the “Central Office Code (NXX) Assignment Guidelines”, issued April 22, that states the following utilisation level:
- ?? 60% effective May 8, 2001
 - ?? 65% effective June 30, 2002
 - ?? 70% effective June 30, 2003; and
 - ?? 75% effective June 30, 2004

C&WJ proposes that the fill rates above be implemented, in the same sequence, upon a Determination being made on the JNNP. That is the effective date of the Determination would be considered to be year 1 and the utilisation level would be 60%.

It is further recommended that “utilisation” be defined on a per switch basis. In areas where multiple switches are located, the utilisation of the combined switches should be used.

- 3.9 C&WJ again advises the OUR of the reduced ability of its customers, and particularly fixed line customers to manage their call charges when an NXX bloc is used jointly. This is due to the high call termination charges levied by Digicel and the fact that customers are accustomed to C&WJ being in certain blocs, such as 8XX. Joint use has resulted in confusion for the customer and high call charges. Knowing that C&WJ is assigned the entire 8XX NXX provides customer with the information that the termination charges are lower than those imposed by Digicel. Customers display a high level of uncertainty with joint use of an NXX blocs, not being sure which provider is assigned which codes in the bloc range. If it were that mobile termination rates were the same, then the fact that the customer knows that he or she is calling a mobile number would be sufficient information, but with disparate termination rates, a disservice is done to the customer, because he or she is unable to determine the cost of the call.

The insistence by the OUR on joint use of mobile number ranges, in this case 8XX and 3XX, seems contrary to its position in Chapter 2 that recognises that numbers are used to determine the tariff for a call and therefore are important to the billing

process as customers are empowered to calculate the expected cost of a call. In light of the recognition of this important facet of numbering, C&WJ request that the OUR bears this in mind when assigning mobile codes. The experience of the Company has been that customers have been unwilling to settle their bills because of high termination rates set by Digicel. This situation is further exacerbated by assigning codes for both Digicel and C&WJ within the same NXX, specifically the 8XX and 3XX blocs .

We propose that the OUR refrain from assigning mobile codes in those NXX number blocs within which codes have already been assigned to another mobile service provider, with a different termination rate.

It is also proposed that that the OUR post an advisory of NXX that have been assigned to all service providers, on its website, that clearly identifies the service provider to which the NXX has been assigned.

- 3.16 As stated at sections 3.2 and 3.4, the specified current allocation of 3.2 million for geographic use is overstated.
- 3.20 C&WJ recommends that the OUR adopts the NRUF. The NRUF captures basically the same data as the COCUS but facilitates the submission of Jamaica's data to NANPA.

Question 1

What are your views in relation to the future demand for numbering resources?

Numbering resources are likely to be demanded for the following services:

- ?? Mobile services
- ?? Inbound roaming
- ?? E-fax
- ?? ENUM

Question 2

Do you agree with the Office's assessment of the adequacy of existing supply of codes for the foreseeable future?

Yes.

Question 3

Should the 77X – 79X ranges be transferred to the cellular range?

Yes. C&WJ strongly recommends that the 77X – 79X be kept in the cellular range. Currently C&WJ is using twenty-five (25) of the thirty (30) NXX in the range for mobile service. It is much easier to remove the customers in the five (5) remaining ranges which are assigned to POTS services. This is in keeping with Section 8(3)(f) of the Telecommunications Act 2000 which states that:

“For the purposes of subsection (2) the Office shall . . . as far as possible and subject to paragraphs (a) to (e), avoid the imposition of cost on customers as a result of changes in the numbering system and . . .”

Section 8 (3)(g) which states that:

“ For the purposes of subsection (2) the Office shall . . . to such extent as may be reasonable and subject to paragraphs (a) to (f), preserve the numbering system maintained by the existing telecommunications carrier and the numbering allocations existing immediately before the appointed day.”

Question 4

What specific changes to the existing numbering arrangements would you recommend, and what time frames for their implementation ?

It is recommended that N11 codes be placed in the “public interest” category.

CHAPTER 4

Numbering Resources to be Administered by the Office

Application for Resources

Cable & Wireless Jamaica recommends that the OUR be copied on application for resources that the Office does not directly administer and that the application for common NANP resources be sent directly to NANPA or the relevant organisation.

Question 1

What are your views as to the potential usefulness of the resources (other than CO and Signalling Codes) discussed / recommended in this chapter ?

The resources discussed were CICs; CO codes; PNS N00-NXX Codes; 555-XXXX; 900 NXX; NPA 456; VSC; 800-855; IMSI; SS7; SANC ISPCs; SIDs; DNICs; N11; 1XX; 11X; Toll Free;

Although all the resources are not currently used in Jamaica, it is important to know that they are available for use should the market, regulatory or technical developments necessitate the use of the same. Current codes assigned to PNS, 555-XXXX, NPA 456; 800-855; IMSI and N11 are not used in Jamaica.

For the sake of clarity, it would be useful for the OUR to produce a list of those codes it administers directly and those codes administered directly by the North American Numbering Plan Administrator (NANPA).

Question 2

Do you agree to an expanded use of 1XX short codes in the fixed network and the use of the proposed 1XX (#) dialling format?

C&WJ believes that there should be an expanded use of the 1XX short codes in the fixed network. We also agree that the use of 1XX (#) is an elegant solution, however the implications of the same will have to be investigated further to ensure that it is a technically feasible solution.

The OUR will however have to establish guidelines on the basis of the allocation of short codes. If short codes are perceived as a competitive issue, the demand will exceed the supply.

Question 3

Do you agree that N11 and N00 codes should continue to have “Reserved” status ? What in your view would be the most appropriate use of these codes ?

C&WJ agrees with the classification of the OUR and the intended use of the codes, that is for special services and public interest.

Question 4

Should the limited supply of abbreviated dialling resources be apportioned to the three general categories of use – Public Interest, Common and Service Provider Specific? If so, by what ratio ? if not why?

C&WJ agrees with the classification. These resources should be allocated according to the express need of each category. The Public Interest category should be accorded priority.

Question 5

What are your views in relation to the future demand for each of the three types of codes?

There will always be need for codes for Public Interest, but there is not expected to be any significant increase in demand for these types of codes. Also it is not expected that there will be a significant increase in demand for Common Codes. The demand for Short Codes will come from service providers, who will use Short Codes for branding and for access to a proliferation of new services. Also, since it appears that the number of digits dialed in the NANP will expand, abbreviated dialing will be considered to be more convenient than dialing all the digits of a regular telephone number.

Question 6

What are your views in relation to the introduction of Toll Free Service portability? Comment on the technical and commercial implications ?

The treatment of the administration of toll free codes would necessitate a separate consultative document because of the number of issues to be addressed which are integral to the provision of the service.

A of history of the development of toll-free service in the NANP will demonstrate this point:

Since May 1993, toll free access has been provided in the USA using the SMS/ 800 database. Canada joined the SMS/800 database on January 29, 1994.

The Service Management System (SMS/800) database is centralised and contains the information associated with each toll free number. The data contained on the database includes the identity of the carriers (s) selected by the customer. The introduction of the use of the SMS/800 database coincided, in the USA, with the introduction of toll free number portability.

The database is used by Responsible Organisations to reserve new numbers, return unused numbers, and update customer records and routing instructions for the toll free numbers assigned to them. A Responsible Organisation is defined as that entity, designated by the 1-8XX service customer, that assumes the duty of managing and administering the appropriate records in the SMS/800 database. A Responsible Organisation is the only entity that can generate, reserve or administer an 800 toll free number within the SMS/800 number pool. To gain access to the database one must establish relations with a Responsible Organisation or become one.

Prior to the introduction of the database, an 800 number was associated with a specific carrier or 800 service provider in both the USA and Canada. Each service provider was responsible for assigning their own 800 codes to their own customers. These numbers were therefore not portable, because the identity of the carrier was embedded in the 800 number.

There is a fixed cost for joining the SMS/800 database per Responsible Organisation which was over US\$ 500,000. This does not include the substantive recurring per unit cost that are incurred per logon, per report, per person, per card issued and per 8XX number per month.

When the SMS/800 database was formed the Caribbean opted out because of the prohibitive cost. To facilitate the Caribbean, codes were assigned to service providers and there are a few that are reserved for use in the Caribbean.

Without joining the SMS/800 database, porting of toll free numbers in Jamaica is virtually impossible. Porting of toll free numbers using the SMS/800 database is also prohibitively expensive.

Therefore at this time it is technically impossible and commercially unfeasible to port tollfree numbers.

Reference is made to section 37 (1) of the Telecommunications Act 2000 which states that:

- (1) *“ subject to this Act, the Office may make rules subject to affirmative resolution imposing on any public voice carrier, the responsibility to offer number portability if the Office is satisfied on reasonable grounds that –*
 - (a) *the benefits likely to arise from the requirement to provide a particular form of number portability outweigh the likely cost of implementing it and;*
 - (b) *the requirement will not impose an unfair burden on any carrier or service provider.”*

Question 7

Do you think that the use of Vertical Service Codes should be standardised in accordance with the NANP assignment shown in Annex C?

Annex C has not been found, nevertheless the assignment of VSCs is by C&WJ is consistent with the NANP format of *XX or *2XX from a touch phone instrument.

CHAPTER 5
The National Numbering Plan – The Office’s Proposal

Question 1

What are your views on the relative importance of the evaluation criteria set out at the beginning of this chapter ?

C&WJ is in support of the evaluation criteria. However the Office has omitted one criteria which C&WJ wishes to see added and that is found in Section 8(3) (g) of the Telecommunications Act 2000. The section states that:

“ to such extent as may be reasonable and subject to paragraphs (a) to (f) , preserve the numbering system maintained by the existing telecommunications carrier and the numbering allocations existing immediately before the appointed day”.

Question 2

What are your views as to the appropriateness of the proposed resource allocation categories and the corresponding levels of number allocation ?

C&WJ, in general, agrees with the appropriateness of the proposed resource allocation categories, with the exception of the following:

- ? 11X is to be specifically included in the numbering plan. It is used in the “Public Interest”, “Common” and “Service Provider-Specific” categories.
- ? ? The 55X – 59X number ranges should not be considered for geographic allocation. There are already 2.7 million numbers within the allocated ranges and this should more than suffice for geographic code use. For the reasons noted earlier, the 55X – 59X number ranges should be reserved for growth
- ? ? The 77X – 79X range now allocated for competitive wireless should not be considered for later migration to competitive geographic use, given:
 - ? ? The adequacy of allocated geographic codes.
 - ? ? The negative impact on C&WJ and its customers of changing the telephone numbers for approximately 250, 000 customers for the twenty-five (25) NXXs in use, in the range, for mobile services, of the total thirty (30) NXXs in the range.
 - ? ? That C&WJ should not be placed at a disadvantage due to legacy allocations from the 809 NPA era. In other words all legacy allocations and assignments should be seamlessly incorporated into the proposed plan. There is no need

to change subscriber numbers unnecessarily and this is further supported by the fact that Jamaica's 876 NPA is under no threat of exhaust for the foreseeable future.

- ? ? The migration would see a reduction in the number resources allocated to the growing wireless service and an increase in the allocation to lower growth, geographic services.

Question 3

What do you envisage as important implications (e.g. cost, administrative, technical, service) of the proposed code changes ?

The Company agrees with the OUR that any agreed changes should be implemented on a phased basis.

The Company is however surprised that the OUR appears to have minimised and trivialised the magnitude of the proposed code changes. The OUR would expect that changing a few customer codes from time to time will not have the effect of large scale dislocation that wide ranging code changes do have. The code changes effected by the Company from time to time affect a small portion of the telephone using public. The code changes being proposed by the OUR will result in major dislocation.

These changes will have an even greater impact than changing to the 876 NPA for Jamaica. In the change to the 876 NPA, only the three digit NPA was changed and the same subscriber numbers were retained. This change affected mostly the overseas market – those calling to Jamaica. There was no change in the subscriber numbers as the same subscriber numbers were used with the new 876 NPA. The code changes proposed by the OUR will affect both the local and the overseas market and it is not the change of a three digit code but, in the majority of cases, a change of seven (7) digits for thousands of customers. In addition it is the switch at the two (2) international gateways that were programmed with 876. The NPA codes changes being proposed by the OUR will affect the entire domestic switching network.

The customer impact, particularly for business customers includes:

- ?? Loss of business
- ?? Stationery, signage and advertising material reprint and possibly direct mail to customers, locally and overseas.
- ?? Alarm monitoring companies, if affected, will have to reprogramme dialing device located on their customers' premises. They are open to liability if this is not done.
- ?? Users of point of sales terminals and other devices that automatically dial pre-programmed numbers will be required to individually reprogramme some units.
- ?? Lack of call completion
- ?? Lowered value of the printed directory

The impact on the company is:

- ?? Lowered quality of service
- ?? Lack of call completion causing loss of revenue, both locally and overseas
- ?? Advertising expense
- ?? Increased cost of additional manhours that will be necessary to do the reprogramming of the switches and operational support systems.
- ?? Loss of customers to the competitors.
- ?? The expense of training staff

The OUR has indicated that the only changes the Company would need to implement is the reprogramming of its network. This is not as simple as the OUR understands it to be. Not only do the switches need to be reprogrammed but other operational support systems within the Company will need to be reprogrammed. Each switch in the network is connected to all the others and each switch needs to know the switch on which a particular NXX reside. Each switch that has had an NXX change must advise all the other switches of the change. Therefore reprogramming the switches is not a linear but an exponential process.

Unfortunately, no matter how much effort and expenditure the Company makes to communicate with and advise its customers, there will be inconvenience and confusion following such widespread code changes. Every customer is affected – businesses and residences, wireless and wireline.

Question 4

Do you think that people adapt relatively quickly to code and number changes ?

People will remember the number that has been assigned to them. C&WJ expects that it will take customers just as long to learn the new numbers as it took to learn the old ones. It may even take longer if multiple numbers are being learnt at once.

Question 5

Do you agree with the proposed basic principles (Paragraph 5.3) to governing the use of numbers in the respective categories? What changes, if any, would you recommend that would ensure that numbers are efficiently used and that hoarding of resources is avoided?

In general, C&WJ agrees with the basic principles. The use of the proposed guidelines and the audit function therein should suffice to ensure that numbers are used efficiently.

Question 6

What are your views in relation to the appropriateness / technical implications of the proposed 1XX (#) dialing arrangement for the use of 1XX access codes in the fixed network ?

Please see response to question 2 of chapter 4.

Question 7

What are your views in relation to the establishment of rate centres on the basis of existing parish divisions ?

C&WJ believes that the establishment of a Rate Centre is an anachronism. C&WJ does not use a Rate Centre setup in order to rate its calls. Our rates have been “postalised”, that is the rate to a customer to call any exchange in the island, outside of the local customer’s exchange area is the same. It does not matter how close or how distant the other exchange is, the rate remains the same

Rate Centres were useful years ago when distance sensitive tariffing was important. A Rate Centre is a fixed point within each exchange that would ensure consistent mileage measurements between exchanges, and therefore consistent billing for long distance services.

Then rate centres were applicable since they facilitated routing and rating of calls. Now, operators “postalise” their rates. Furthermore the technology has progressed to allow several exchanges to be replaced by one switch with subtending “remotes” for routing purposes.

Also, it has been recognised that rate centres utilise number resources inefficiently because each had to have a unique NXXs assigned. This has resulted in the wasteful use of number resources and is an indictment on prudent husbandry.

It is proposed that Jamaica should be classified as a single Rate Centre, in the TRA database, for the routing of international calls.

Question 8

Do you agree with the scope, timing and method of migration of services to new number ranges? If not, what are your recommendations as to migration strategies that could be followed ?

C&WJ recommends that the Company be allowed by the OUR to consider and document all the steps and resources necessary on its part to implement the agreed changes, using a timeline. Based on this project document submitted by the Company and negotiations with the OUR, a time frame is agreed and a final project document submitted and the plan implemented.

Further and very importantly, the Company intends to use churn and attrition as a fundamental migration strategy to reduce the need to transfer any customers to new number ranges. Once a customer has churned, the number will be aged and not reassigned, in this way the Company can progress to the complete vacation of some number ranges, within a few years, without having to uproot customers.

CHAPTER 6

Proposals for Rule Making for the Administration of the NNP

- 6.4 It is proposed that the Office should also be responsible to attend the NANC and other NANP industry meetings and advise via a Numbering Bulletin of the developments in those for a that are likely to affect carriers and service providers in Jamaica.
- 6.20 C&WJ has agreed to notify the international administrations of new number ranges that have been opened in Jamaica. This function will cease in March 2003 when it is expected that there will be other international service providers.

Question 1

Is the scope of coverage of the rules adequate to ensure fairness and efficiency in the administration and use of numbering resources, and if not, what enhancements, and other rules, might apply ?

In general, the rules are fair, given that they are not retroactive. C&WJ will not agree with any retroactivity of any rules referred to in this section or any other in this document or in any of the Guidelines referred to.

Question 2

Is the proposed classification of the use of numbers satisfactory? What amendments, if any, would you propose ?

The rules are satisfactory, however C&WJ request that the OUR propose the classification for a number that is not yet working and has an attached service order pending for more than seven (7) days.

Question 3

What strategy would you recommend for code activation notification to Operator's worldwide, where there is more than one international carrier operating in Jamaica ?

The OUR should advise through the ITUs Operational Bulletin. The TRA already performs the advisory function for NANPA. Otherwise the Operator to whom the code has been assigned should do the notification.

CHAPTER 7
Traffic Routing Administration and Industry Notification

Question 1

Respondents are asked to state whether they agree that the Office should assume responsibility for the inputting of all Jamaican Rating & Routing (Part 2) data into the TRA databases and why ?

The OUR has positioned itself as an Administrative Operating Company Number (AOCN). The AOCN identifies the OUR as the entity authorised by the code holder to input and maintain data in the BIRRDS. A code holder can select any authorised entity to be its AOCN and furthermore the code holder can update the BIRRDS on its behalf. No code holder should be forced to accept the OUR as its AOCN. Selecting an AOCN is a contractual arrangement – freely entered into and exited. It is not mandatory.

Question 2

If several entities have data input responsibility, what guarantee should be in place to ensure that all of Jamaica's data in the TRA databases are satisfactorily maintained ?

It is recommended that the OUR consult with the TRA on the best way forward on this matter.

CHAPTER 8
Funding for Traffic Routing Administration

The Company that incurs the cost should pay. However, given that some Service Providers may not use the OUR as their AOCN, they should not be liable for any cost incurred, by the OUR, for the administration of numbers in the TRA.

CHAPTER 9

Expansion of the North American Numbering Plan

It is recommended that the OUR makes a presentation on this matter and sets a date for discussion and formation of a working group to examine this matter in greater details and make recommendations to protect the interest of Jamaica and in general, the Caribbean.

The objective of the INC NANP Expansion Workshop is “ to develop an industry agreed recommendation for expanding the capacity of the North American Numbering Plan to meet the long term needs of the telecommunications industry and the user community in the geographic area served by the NANP’

This matter of expanding the capacity of the NANP must be treated as a separate consultation, but first the OUR must report to the industry on the status of the matter since the OUR has been represented at the NANC meetings.

It is not reasonable to expect any substantive response to such fundamental changes in the NANP in a little over a month, for a matter that the INC NANP group has been working on since 1995.

While the NANP is expected to exhaust sometime between 2024 and 2038, preparations for a transition of this proportion that will affect the entire NANP needs a lead time of from five (5) to ten (10) years. Therefore C&WJ recommends that the OUR prioritise this matter and advise urgently of the date of the industry forum to discuss the same.

JAMAICAN CENTRAL OFFICE CODE ASSIGNMENT GUIDELINES

- ? ? The OUR is requested to advise on the proposed cost recovery mechanism for number administration.
- ? The OUR is being requested to advise of the criteria for transfer of CO codes
- ? The OUR is being requested to advise of the type of operators who will be able to apply directly to the OUR for number resources.
- 3.8 11X should also be included given that we are keeping this format. The OUR is being requested to explain further “projected future home and neighbouring NPAs”.
- 4.5 Clarification is being sought from the OUR on the import of this clause.
- 6.3.1 (a) The OUR is being requested to speak to the relevance of these categories to Jamaica. Are these new classification for the Jamaican telecoms market ?

Reclamation Procedure

- 7.1 It is assumed that these provision will not be retroactive, but rather comes into effect when the Office has made a Determination and affects those codes that are subsequently assigned.
- 7.2.2. It is recommended that these steps be detailed in a procedural table and workflow format.

APPENDIX B -CODE ACTIVATION TIMELINE (INITIAL & ADDITIONAL)

NANPA processed more than 47,000 request for additional CO code assignments or change of existing assignments in 2001. NANPA responds on the 14th calendar day.

While the existing CO Guidelines specify that the OUR should respond to the applicant on the 14th calendar day, C&WJ is of the view that since the OUR will not have to contend with the volumes that NANPA contends with, the OUR should respond promptly to request, as it is able to.

C&WJ also recognises the concerns that the OUR has that overseas carriers be given forty-five (45) days for the newly assigned codes to penetrate their networks, nevertheless, the primary focus for the local operator will be the domestic market, not the overseas market. The OUR has to recognise that in the comparatively huge U.S market, with a population of approximately 274 million, the TRA is necessary for domestic carriers and service providers to be advised of codes assigned to other domestic carriers and service providers. In Jamaica, the market will facilitate communication of assigned codes and code changes without the need for a TRA database. C&WJ is of the view that the TRA facilitates the domestic

telecoms market in the USA and request that the OUR facilitates the domestic market in Jamaica. Carriers and service providers should not be penalised for not achieving the forty-five (45) notification period under extenuating circumstances.

Further to the above the OUR should remove the constraint of a code being requested all of sixty-six (66) calendar days in advance. C&WJ submits that the nature of the telecommunications market, in Jamaica, is such that a service provider is not always able to accurately predict the need for codes. Therefore the OUR needs to amend the guidelines to empower itself with the flexibility to waive the regular procedure under exceptional circumstances.

It is recommended that the terminology on the following forms be Jamaicanised, except where there are other comments.

**PLANT TEST CODE APPLICATION FORM & OUR RESPONSE
CONFIRMATION FORM**

“Province” is redundant. At any rate it should be replaced by “ Parish”.

APPENDIX E – GENERAL INFORMATION

LATA & Local Exchange Carrier

**CENTRAL OFFICE CODE (NXX) ASSIGNMENT REQUEST – PART 2, FORM
1**

- 8. State
- 9. State code.
- 16. The OUR is being requested to advise of the necessity of a business office code.
- 18. Time Zone

**CENTRAL OFFICE CODE (NXX) ASSIGNMENT REQUEST – PART 2, FORM
2**

- 6. LATA
- 10. InterLATA
State

**CENTRAL OFFICE CODE (NXX) ASSIGNMENT REQUEST – PART 2, FORM
7**

- 6. LATA served
- 10. RC state

AGING AND ADMINISTRATION OF DISCONNECTED TELEPHONE NUMBERS

2. From the definition that the OUR uses for “ Disconnected Telephone Number” and “ Suspended telephone Number”, C&WJ understands a “ Disconnected telephone Number” to be one that has been permanently disconnected, that is the customer can neither make calls, including to public interest codes, or receive calls. C&WJ seeks clarification from the OUR on its understanding of the definition of “ Disconnected Telephone Number”.
- 3(2) The Company reserves the right to charge customers for “Specific Announcement Treatment” where the customer has requested that the calling party be advised of the telephone number at which the customer can be reached.

INTERNATIONAL MOBILE STATION IDENTITY (IMSI) ASSIGNMENT GUIDELINES

- 3.9 Typographical error. This should be IMSI, not NMSI.