

Digicel's Response to NPA Area Code Relief Planning Questions Extract from OUR Consultation

1. Question: *What are your views on the potential impact of the specified market developments on numbering? (page 17)*

We agree in general terms with the views stated by the OUR. The fact is that the extremely low utilization of fixed number ranges appears to be the biggest current constraint on overall numbering resources. Accordingly, should the OUR maintain that it is unable to reclaim and repurpose legacy C&W fixed number ranges for the purpose of easing the current numbering constraints within the existing 876 area code then it stands to reason that further numbering resources are required.

2. Question: *What other market conditions and impacts, if any, should be taken into consideration? (Page 17)*

No comment

3. Question: *Do you agree that the Standard Overlay method is the more suitable of the two stated relief methods, for NPA 876, and therefore should be adopted? If not, why? Provide clear justification for any proposed alternative. (Page 20)*

Agreed – Standard Overlay is most suitable for Jamaica.

4. Question: *Do you consider the scope of the NPA Relief impacts outlined above to be sufficiently broad to adequately prepare to address impact risks?(Page 23)*

Yes

5. Question: *Do you envisage any other important implications of the 876 NPA relief? (Page 23)*

The OUR needs to give careful consideration to the interrelationship between the 876 NPA Relief plans and the pending implementation of Local Number Portability. The OUR must be mindful of the potential impact which the introduction of 876 NPA relief will have on LNP and should ensure that this is phased for implementation in advance of LNP or at least done strategically in order that the industry may be allowed to streamline the associated technical requirements associated with each aspect of the implementation process.

6. Question: *What other issues do you think should be considered during the NPA Relief Planning? (Page 23)*

As above, the phasing of 876 NPA Relief should be scheduled preferably in advance of LNP.

7. Question: *Do you agree that Jamaica should move from the current standardized 7-digit to a mandatory 10-digit dialling for all local calls, whether an NPA Split or an Overlay relief method is applied for the NPA 876 relief? If not, please give your reasons and, explain what you think would be an appropriate dialling alternative. (Page 25)*

Yes – 10 digit dialling should be mandatory.

8. Question: *Which of the options, a) or b) above, to effect the elimination of local 7-digit dialling and the introduction of mandatory 10-digit local dialling do you think is more appropriate? (Page 25)*

The permissive method is preferred because it will have less impact on call setup time (subscriber experience) and circuit utilization without corresponding revenue. A hybrid can be considered where not every call is subjected to a pre-announcement but instead a percentage of calls dialled with the 7-digit format receive the announcement. This percentage should not exceed 20% and may be eliminated depending on the observed network impact.

9. Question: *Should the public be informed, in the public education programme, about the permissive dialling period? (Page 25)*

Yes – the public should be informed of the fact that permissive dialling will be facilitated for a limited period but it should be clear on when this will cease. This should help reinforce that behavioural/dialling changes will be required.

10. Question: *Do you agree with the stated NPA relief planning principles and considerations? (Page 27)*

Yes.

11. Question: *Do you agree with the proposed relief planning Roles and Responsibilities?(Page 35)*

Yes.

12. Question: *Do you agree with the proposed composition, roles and responsibilities for the Relief Implementation Task Forces? (Page 35)*

Yes.

13. Question: *Do you agree with the proposed Relief Implementation Schedule? If not, please give reasons and suggest alternative approaches, etc.(Page 40)*

The OUR needs to clearly map out the timelines being proposed before we can confirm agreement.