



Response

on

“The Jamaica National Numbering Plan”

to

Office of Utilities Regulation

by

Digicel

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TABLE OF CONTENTS

1	INTRODUCTION.....	4
2	GENERAL COMMENTS	5
3	DETAILED RESPONSES	6
3.1	CHAPTER 3 – THE CURRENT STATUS OF NUMBERING	6
3.2	CHAPTER 4 – NUMBERING RESOURCES TO BE ADMINISTERED BY THE OFFICE	8
3.3	CHAPTER 5 – THE NATIONAL NUMBERING PLAN – THE OFFICE’S PROPOSALS .	10
3.4	CHAPTER 6 – PROPOSED RULE MAKING FOR THE ADMINISTRATION OF THE NATIONAL NUMBERING PLAN	13
3.5	CHAPTER 7 – TRAFFIC ROUTING ADMINISTRATION AND INDUSTRY NOTIFICATION 14	
4	OTHER ISSUES	15
4.1	CHAPTER 8 – FUNDING.....	15
4.2	CHAPTER 9 – EXPANSION OF THE NORTH AMERICAN NUMBERING PLAN	15

1 Introduction

Digicel welcomes the opportunity to participate in the Numbering Consultation and to submit our response to The Jamaican National Numbering Plan document. Overall, we found the document very detailed in its attempt to cover all the issues related to numbering in Jamaica. The OUR must be commended for putting together a very comprehensive document.

Numbers are a national resource and should be managed in the overall interest of, not only the telecommunications sector, but the country as a whole. It has been recognised worldwide that an inadequate numbering plan can get in the way of service growth and *stifle* innovation. The challenge facing the OUR at this point must be to ensure that the rules and systems instituted are easy to use and provide an adequate supply of numbers for new services and service providers.

2 General Comments

Need for separate consultation on some issues

As mentioned in the introduction, the OUR must be commended for the comprehensive consultation document. However, Digicel feels that perhaps some issues would be better explored if separated from this general consultation. They could easily form the basis of a separate consultation, or at the very least, would benefit from a workshop to fully explore the issues. The latter option would give the industry a chance to better familiarise themselves with, what for many would be, new concepts and procedures. Specifically, chapter 6 and the corresponding Annex B-1 ‘Jamaican Central Office Code Assignment Guidelines’ is one such example.

Digicel is suggesting that a workshop or industry forum be held to explain the detailed rules/ guidelines that are being proposed, so that all affected entities can get an opportunity to better explore the proposals. Further, after the workshop, a separate consultation should be held to formalise the rules.

The issue of the extension of the North American Numbering Plan is also another issue that requires a separate consultation

3 Detailed Responses

In this section of the document we will give specific comments on items in each of the chapters. Responses to the various questions raised in the consultative document will also be given. We wish to state that the absence of comments on an issue does not necessarily indicate Digicel's concurrence with the opinion(s) articulated in the document.

3.1 Chapter 3 – The Current Status of Numbering

Paragraph 3.7

Digicel agrees with the OUR that no additional codes should be allocated in these blocks until a suitable transfer plan is developed.

Paragraph 3.10

Digicel notes the OUR's plans to evolve the 3XX and 8XX ranges into Cellular while designating 4XX for growth. Currently there are two carriers with cellular numbers in the 4XX range and no mention is made as to how these allocations will be handled. Digicel would like to know if these numbers will be "transferred" at a later date to either the 3XX or 8XX blocks or if these numbers will eventually have to co-exist with other categories of numbers thereby creating a mixed block of numbers.

The latter option of having a mixed block would only re-create the current situation with the 7XX range. To avoid all the related complications, Digicel proposes that the 4XX block also be designated for Cellular use.

Paragraph 3.12

As mentioned in our comments above, the 4XX range should be designated for Cellular use, if not for primary allocation, then reserved for Cellular growth *only*.

Paragraph 3.13

Digicel agrees that a 'reality test' must be applied. However, the growth in the Jamaican cellular market has far exceeded all expectations. Therefore, it is the carriers themselves that are closest to the market and have modelled their forecasts accordingly.

Further no mention is made of the advanced services, now available that the liberalisation of the market has brought. Customers are now able to access voice as well as data services from their handsets. These, and other services, require separate numbers, which means that one subscriber could have more than one number assigned to him. Additionally, the OUR should not overlook the fact that some subscribers have multiple accounts, sometimes with more than one provider.

The Office should be careful not to impose its preconceived ideas about the growth potential of the market without sufficiently factoring in the input from carriers. As there

is a provision to reclaim unused numbers in a particular timeframe, Digicel feels that there are sufficient provisions in place to prevent hoarding of numbers.

Question 1: What are your views in relation to the future demand for numbering resources?

Comments on this issue have been offered already in response to paragraph 3.13.

Question 2: Do you agree with the Office's assessment of the adequacy of existing supply of codes for the foreseeable future?

Agreed, that the current 876 area code will be sufficient to satisfy the current demands and also for the foreseeable future. Constant monitoring of the usage levels will be needed to ensure that alternatives are identified early, should the situation change.

Question 3: Should the 77X-79X ranges be transferred to the cellular ranges?

If Cellular currently utilizes more of the number than POTs within this range then it should be reserved for Cellular.

Question 4: What specific changes to the existing numbering arrangements would you recommend, and what time frames for their implementation?

Reference to our comments on paragraph 3.10 and 3.12, 4XX should be designated as growth for Cellular.

3.2 Chapter 4 – Numbering Resources to be administered by the office

Paragraph 4.1

Please find below Digicel’s views on the proposed numbering resources to be administered by the OUR.

Numbering Resources	Administered by the OUR
Central Office Codes	Yes
Carrier Identification Codes	Yes
Personal Communications Service Codes	Yes
555-XXXX Line Numbers	Yes
900-NXX Codes	Yes
International Inbound 456-NXX Codes	Yes
Vertical Service Codes	No *
800-855 Line Numbers	Yes
ANSI SS7 Point Codes	Yes
SANC/ISPC	Yes
IMSI	No*
SID	Yes
DNIC	Yes
8XX (Toll Free) Numbers	Yes

?? Vertical Service Codes:

The OUR should administer only some codes e.g. 119, 116, 110. The Service Providers should be free to use other codes such as 100, 121, 122, 123 etc.

?? IMSI

Digicel believes that the IMSI should continue to be administered by the GSM Association.

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?

Digicel believes that the numbering resources identified are important to the development of a vibrant Telecoms industry. Please refer to the table above in respect of the administering of these resources.

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?

As stated 1XX dialling works just fine in the fixed network and therefore there is no need to change the way this is done. Putting (#) after dialling a short code in the fixed network

is only a matter of educating the consumers and it is already practised by some consumers. Using these short codes on any network should be a function of the Service Provider and not for the OUR to regulate. Only the standard codes should be of concern to the office e.g. the emergency codes 119, 110 etc. It should be the responsibility of the Carrier to ensure that the switches are configured correctly to ensure the correct routing of these codes.

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?

From NANPA practices, N11 or N00 codes are reserved and these should stay this way the most appropriate use should be determined by the office and these should be standard across the networks. e.g. 911/119, 110 etc.

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?

The only abbreviated dialling resource that is limited is used in the Public Interest category. E.g. 119/911 for emergency. These numbers are standard across NANPA, there should not be any more codes required for these purposes.

An Operator should be allowed to use/assign its own abbreviated dialling numbers in whatever format they desire (e.g. *8663,8663,8663#) as long it is within the assigned number ranges.

Question 5: What are your views in relation to the future demand for each of the three types of codes?

As stated if Operators are allowed to use these abbreviated dialling codes from allotted number ranges then there should be no issues as to the future demand.

Question 6: What are your views in relation to the introduction of Toll Free Service portability? Comment on the technical and commercial implications?

Digicel’s view at this time is that all local Toll-free numbers should be controlled by one body that would administer these numbers accordingly.

Question 7: Do you think that the use of Vertical Service codes should be standardized in accordance with the NANP assignments shown in Annex C?

Only the ones administered by the OUR.

3.3 Chapter 5 – The National Numbering Plan – The Office’s Proposals

Paragraph 5.2

Digicel notes the OUR’s criteria for reorganizing the national Numbering Plan and offers the following specific comments.

“Provide customers with a broad indication of service type and cost”

Digicel is in general agreement with this criterion but questions the extent of its application in the Cellular ranges. This seems to go counter to the OUR’s stated objection to carrier branding of numbers and to a non-uniform retail rate.

If one examines the 3XX range, there are 3 carriers with allocations in this range, which are all free to set their own rates for call types. Therefore customers can be faced with many tariffs for dialling numbers in the 3XX range. [Possibilities include calls within the same network- prepaid or contract, calls from other mobiles- prepaid or contract, or calls from a fixed network]. This situation is likely to be compounded when other mobile or fixed operators enter the market.

Digicel feels that there aren’t sufficient distinctions between the numbers that have been allocated in the 3XX range, to satisfy this criterion. Further, though the OUR has stated its objection to carrier banding, an explanation has not been offered as to why it is undesirable or unsuited for the Jamaican market. Digicel urges the OUR to provide its reasoning on the issue.

“Cost effective and practical for industry implementation”

Digicel notes that there will be some CO Code reallocation and that the OUR’s approach will be ‘evolutionary rather than revolutionary’. As we have been allocated numbers in a category designed for growth, Digicel once again seeks assurances from the Office that we will not be asked to move our subscribers from the 4XX codes, which have been allocated to us.

“Support effective competition”

As mentioned in the introduction, inadequate numbering can get in the way of service growth and stifle innovation. Digicel fully support this criterion and reiterates the point made in paragraph 3.13 that the Office should include the input from carriers on the growth potential of the market when considering assignment request.

Paragraph 5.3

The suggestion that the 11X access codes should be retained in their current application could conflict with the consultation on DQ and the use of the 114 code. One of the options being examined is changing the 114 code which would remove the barrier to entry, created by the familiarity with the number, for other operators wishing to enter the

market. Any examination of this code in the context of a numbering consultation needs to be cognisant of the outcome of the DQ consultation.

Digicel notes that the 112 code is to be recovered. As the OUR is aware, this code is internationally recognised as the GSM emergency code and is programmed into all GSM handsets. It can be dialled from a handset that does not contain a SIM card; as a roamer on any visited network (this number is translated to the local emergency code e.g. 119 as is done in Jamaica) and finally, even if the subscriber is not provisioned to roam on a network, the call to 112 will go through. Given the international recognition of this short code, Digicel is therefore concerned of the proposal to reclaim it.

Question 1: What are your views on the relative importance of the evaluation criteria set out at the beginning of this chapter? How does the proposed numbering plan measure up to these criteria?

The criteria identified are in keeping with international standards and also are applicable for the Jamaican market. Digicel is in general agreement with them except for the specific comments made above.

Question 2: What are your views as to the appropriateness of the proposed resource allocation categories and the corresponding levels of number allocations?

Broadly speaking they are adequate, except for 4XX, which should be reserved for *Cellular* growth instead of being a general growth category.

Question 3: Do you think that people adapt relatively quickly to code and number changes?

Code and number changes are not uncommon in Jamaica. On the national level, all telephone users had to change from using the '809' area code to '876'. While on the local level, there have been changes in many residential and business telephone numbers over the years. Though there is always some dislocation, these can be minimised with careful planning.

Question 4: 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?

The principles are quite fine the only change would be to have 4XX designated as Cellular growth.

Question 5: What are your views in relation to the appropriateness/technical implications of the proposed 1XX (#) dialling arrangement for the use of 1XX access codes in the fixed network?

Please refer to our comments in Chapter 4.

Question 6: What are your views in relation to the establishment of rate centres on the basis of existing parish divisions?

To encourage greater competition operators should be allowed to decide how they will set their tariff structures rather than the OUR dictating that a Rate Centre mechanism be used. C&WJ only a few years ago changed from the Rate Centre mechanism to the one they are currently using where the cost of the call depends on duration as well as location (inter-parish vs. intra-parish).

Question 7: 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?

Digicel broadly agrees with the proposal.

3.4 Chapter 6 – Proposed rule making for the administration of the national numbering plan

As mentioned in our General Comments, Digicel feels that the contents of this chapter and the corresponding Annex B-1 should be the subject of a workshop and a separate consultation. Therefore we will reserve comments on the individual proposals for rule making along with the Central Office Code Guide lines.

Indicative areas that we would need further clarification on include, but are not limited to, the following:

- ✍✍ The application process for non CO Code resources – i.e. the other numbering resources to be administered by the Office
- ✍✍ The flexibility the OUR has in modifying the NANPA rules to suit the Jamaican market
- ✍✍ Clarification on the different databases – RDBS, BRIDS, LIDB etc
- ✍✍ Roles of the Applicants and Code holders, particularly in entering data in the various databases
- ✍✍ Timeframe for applications and allocations – sixty six calendar days is too long. If the OUR is going to adhere to this timeframe it should allow operators to have at least 66 days of numbers available.
- ✍✍ The Central Office Code Utilization Survey (COCUS)
- ✍✍ The in-service and reclamation timeframes
- ✍✍ The five year time period for retaining application forms

3.5 Chapter 7 – Traffic routing administration and industry notification

The issues in this chapter are closely linked to those in chapter 6 and should be included in a separate consultation. Subject to further consultation, these are the views of Digicel on the questions raised.

Question 1: Respondents are asked to state whether they agree that the Office should assume responsibility for the inputting all of Jamaican Rating and Routing (part 2) databases and why?

The Office should undertake this responsibility. As it already allocates numbers then it would be in the best position to ensure that the information that resides in these databases is accurate.

Question 2: If several entities have data input responsibility, what guarantee should be put in place to ensure that all of Jamaica's data in the TRA databases are satisfactorily maintained?

The OUR should be the one with input responsibility.

Question 3: What strategy would you recommend for code activation notification to operators worldwide, where there is more than one international carrier operating in Jamaica?

This issue should be discussed in an industry forum.

4 Other issues

4.1 Chapter 8 – Funding

Since all Telecoms operators already pay licence fee to the OUR, the cost for subscribing to these bodies should be drawn from this pool of funds.

4.2 Chapter 9 – expansion of the North American numbering plan

As mentioned in our General Comments, given the impact of such an expansion, this issue should be separated from a general consultation on numbering.