



**CACU Response to OUR  
Consultation Document**

**on**

**REVIEW AND REVISION OF  
THE JAMAICAN NATIONAL  
NUMBERING PLAN**

**&**

**THE TELECOMMUNICATIONS  
NUMBERING RULES-Phase 1**

August 2019



August 9, 2019

Office of Utilities Regulation  
P.O Box 593  
36 Trafalgar Road  
Kingston 10

Attention: Curtis N. Robinson

Subject: Response to the Consultation Document – Review and Revision of the Jamaican National Numbering Plan & Telecommunications Numbering Rules – Phase 1

The Consumer Advisory Committee on Utilities (CACU) would like to share our collective feedback on the above name consultation document.

We are happy to have an input to these regulations for our nation and look forward to having the best outcome for all concerned.

In that regard, please find below, the CACU's response to the Consultation Document on the subject.

We look forward to further discourse on this important matter.

Regards,

**Carolyn Arnold (Mrs) SMIEE, PE, PMP**  
Electrical Engineer & ICT Professional  
Consumer Advisory Committee on Utilities (CACU)

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**Response to questions:**

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**Question 2.1:** Do you agree with the OUR's position on the current allocation of numbers under area code 658? If not, please explain your views and/or any alternative proposition.

**Response:** *The CACU agrees with the current allocation of numbers for the 658 area code. The OUR should ensure however, that there is ample capacity to 1) accommodate projects (planned and/or pending) which require capacity and 2) meet growing demand from established businesses. This is of particular importance for the BPO and other technology-based enterprises.*

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**Question 2.2:** What are your views regarding the retention of the UDDP?

**Response:** *The CACU is aligned with the view that the UDDP should remain in effect with the standard 10-digit dialing arrangement for domestic calls. We believe the retention of the UDDP provides for a fair, equitable and transparent environment for all subscribers and telecom providers.*

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**Question 2.3:** Are there any risks in not retaining the UDDP? Please explain?

**Response:** *The CACU believes that there would be an adverse impact to the consumer if there are different ways to dial locally. This would likely require ongoing consumer education, the cost of which may far outweigh the benefits. Visitors would also have to be continuously educated. The risk of a non-uniform domestic dialing approach is that the consumer will likely be very frustrated. Furthermore there could possibly be unfair advantages for some providers and their subscribers, with potential uncertainty and disruption in the marketplace.*

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**Question 2.4:** Do you have any questions regarding these numbering matters that were previously determined, and do you agree with the incorporation of these and other previous and future numbering considerations of the kind, in the JNNP as a single standalone document, for broad industry reference?

**Response:** *The CACU does not have any question but would like to make the note that the Adoption of Alternative Emergency Numbers should harmonize with the consultation on Enhanced Emergency Service Access.*

*The CACU agrees with the incorporation of these numbering matters and other previous and future numbering considerations of the kind, in the JNNP as a single standalone document, for broad industry reference.*

*Therefore, the preference is for one document to include the previously determined JNNP numbering considerations as well as future numbering determinations.*

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**Question 2.5:** Do you have any suggestions regarding the content and presentation style of the JNNP document, which you believe will enhance its utility?

**Response:** *The OUR could consider presenting the JNNP on the web with an easy to use graphical user interface that persons may query for information.*

*The content and presentation should be complete and user friendly – as well as simple enough for consumers/customers to clearly understand and have the relevant references contained therein.*

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**Question 2.6:** Overall, how do you think the proposed JNNP presentation will benefit the industry?

**Response:** *The proposed JNNP should have a positive impact on the industry, reducing anti-competitive behavior and having a positive impact on the consumer's experience. It should be a single source of information for all industry players including customers/consumers.*

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**Question 2.6:** Do you agree with the proposal to retain Geographic services in their currently allocated NXXs?

**Response:** *The CACU agrees with this proposal. It prevents potential disruption in services.*

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**Question 2.7:** What are your views on the proposed numbering of VoIP Services?

**Response:** *The numbers for VoIP can be brought back under the blocks assigned for geographic numbers and the service allocation identified as 'PSTN and VoIP'. Given technological advances and best practices associated with those approaches, it makes sense to return VoIP Numbers to the general pool.*

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**Question 2.8:** Are there material advantages/disadvantages with this approach?

**Response:** *This approach should make it easier to allocate numbers given the way in which VoIP and PSTN numbers are used.*

*Other advantages: Benchmarked against developed market; more efficient use of the allocated numbers; cost-savings; consumers' preference for simple and unrestricted usage.*

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**Question 2.9:** Do you agree with the proposal to discontinue the transition plan and retain the current allocations of NXXs for mobile services, and why?

**Response:** *The CACU agrees with the proposal to discontinue the transition plan and retain the current allocations of NXXs for mobile services. This move seems prudent given the numbering development highlighted in the document. Namely, the reducing termination rates, convergence and portability have removed the need for a transition plan. Consumers #1 concern remains connectivity.*

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**Question 2.10:** Are there any new developments locally that you believe will affect the use and definition of mobile numbers in Jamaica?

**Response:** *There are no new developments that we can consider at this time.*

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**Question 2.11:** Do you agree with the proposed expansion of the 'Public Interest' Category for Access codes?

**Response:** *The paragraphs 2.52 – 2.59 do not make the answer to this question clear. e.g in para 2.52 it is stated that there are only ten(10) N11 codes and N takes the values 2 to 9, this results in eight(8) N11 codes as shown in the N11 Code Categorization table in para 2.53. The previous table indicates that 111 is unavailable while 011 is not under consideration.*

*The Legend in para 2.53 should be further explained. It would be useful to understand the difference between Public Interest (Nationally uniform) and Common (Nationally uniform – Public).*

*100 is used for Customer Care but this is categorized as Common (Intra-Network (Engineering)). Does this categorization reflect its current use?*

*123 is used for voicemail but this is categorized as Service Provider Specific (Intra-Network). Does this categorization reflect its current use?*

*If the categorization as shown in the table 1XX Code Categorization already includes codes reserved for expansion of categories, what is the proposed expansion?*

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**Question 2.12:** What are your views on the use of the 1XX codes in the fixed network and the requisite end-of-dialing indication?

**Response:** *Jamaica's mobile networks are based on the GSM standard. This standard has built into it a number of self-service short codes ending with #, such as \*120# for credit balance. These codes are network neutral and can be used by persons globally regardless of where they are. It may not be prudent to include the use of # for a service provider specific code, considering that we are part of a global marketplace this may cause some confusion vis-à-vis the use of GSM short codes that are close in format.*

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**Question 2.13:** What value do place on the "Service Provider Specific (Intra-Network)" set of 1XX codes?

**Response:** *The objective of this question is not clear. The CACU may not be in the right position to respond.*

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**Question 2.14:** What are your views on the proposed use of the 555-0100 through 0199 range of numbers in Jamaica?

**Response:** *Please clarify footnote 4, in para 2.63. The reference is not given at the end of the document.*

*The CACU sees the proposed use as a reasonable one, in so far as there is enough capacity to respond to the intended purpose and commensurate demand. Additionally, consultation (industry and consumers) is critical prior to the establishment of rules and guidelines. Lastly, public awareness programmes must be designed and delivered across all stakeholders in order to have their buy-in.*

*Why isn't there a question regarding the 456-NXX and the 900-NXX? If 456-NXX is to be removed would this then not require an update to Table 3 of the JNNP allocations?*

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**Question 2.14:** What uses of the “IMSI”, outside of an IoT context, do you envisage or anticipate for the fixed network in Jamaica?

**Response:** *The CACU does not envisage any use of the IMSI for the fixed network outside of an IoT context.*

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**Question 2.15:** Do you agree with the OUR’s proposal to accommodate the assignment IMSI’s for use in the fixed network?

**Response:** <sup>1</sup> *An international mobile subscriber identity (IMSI) is a unique number, usually fifteen digits, associated with Global System for Mobile Communications (GSM) and Universal Mobile Telecommunications System (UMTS) network mobile phone users. The IMSI is a unique number identifying a GSM subscriber.*

*The consultation does not provide a clear justification for doing the same for the fixed network. What are the clear benefits, economic/social or otherwise?*

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**Question 2.16:** Do you agree with the OUR’s proposal to assign separate MCC+MNC resources for use in the mobile and fixed networks. Are there material advantages and/or disadvantages?

**Response:** *The response to this question will depend on the network architecture of the operator. The more information that can be captured for calls would enhance traceability, however the CACU is not in a position to speak to material advantages and/or disadvantages as we believe that this is the purview of the operator.*

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<sup>1</sup> <https://www.techopedia.com/definition/5067/international-mobile-subscriber-identity-imsi>



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**Question 2.17:** Do you see any purpose for the retention of the Rate Centre scheme as originally intended?

**Response:** *The CACU does not see any purpose for the retention of the Rate Centre scheme as originally intended.*

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**Question 2.18:** Do you see any purpose to which the scheme could be adapted—and not necessarily for tariffing?

**Response:** *This scheme could be used for location identification of PSTN/Fixed line and VoIP numbers and possibly for statistical/monitoring purposes.*

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**Question 3.1:** What, in your view, are the main ways in which technological developments will influence numbering policy decisions?

**Response:** *Any technological development should be given due consideration in its influence on numbering policy as is outlined in this consultation regarding M2M communication. The way in which any other development could influence should be examined upon its merit when all information is known.*

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**Question 3.2:** How and to what extent should the OUR's current and future decisions take into account such developments?

**Response:** *The relevant Acts of parliament (such as the OUR Act etc.) and the process of consultation and determination should be sufficient to guide the OUR on this matter. Furthermore the OUR must keep pace with global developments in critical areas such as the allocation of numbering resources and should avoid micro-managing an industry which has outpaced regulatory decisions over the past few years.*

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**Question 3.3:** Do you believe that there is need for less regulatory control over the use of specified numbering resources for the operation of telecoms networks, and what are the risks? Please explain with justification.

**Response:** *Simplification of the regulatory regime governing specified numbering resources would make for more efficient oversight of the resources.*

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