



**Digicel's Submission in Response  
to a Consultation Document on a  
Local Toll Numbering Scheme**

4 November 2015

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To: Office of Utilities Regulation  
c/o Curtis N. Robinson  
Manager, Technical Services (Regulations & Policy)  
3<sup>rd</sup> Floor, PCJ Resource Centre  
36 Trafalgar Road  
P.O. Box 593  
Kingston 10

**Introduction & Overall Comments**

Digicel (Jamaica) Limited ('Digicel') is grateful for the opportunity to provide comments on the '**Local Toll-Free Numbering Scheme Consultation Document**'. The purpose of this scheme is to restructure the current toll-free number process to promote competition and provide for porting of toll-free numbers in Jamaica between various telecommunications service providers. Digicel is keen for this process to be completed.

The succeeding comments are not exhaustive and Digicel's decision not to respond to any particular issue raised in the document does not necessarily represent agreement, in whole or in part with the position taken by Digicel in this document mean a waiver of any kind of Digicel's rights in any way. Digicel expressly reserves all its rights. Any questions or remarks that may arise as a result of these comments by Digicel may be addressed to:

**Maia A. Wilson**  
**Head of Legal & Regulatory Affairs**  
**Digicel (Jamaica) Limited**  
**14 Ocean Boulevard**  
**Kingston, Jamaica**

**Fax: + 1 (876) 922 -7666**

**Tel: + 1 (876) 619 -5000**

**Response to Specific Questions Raised by the OUR**

**Question: *Do you agree with the proposed LTFNS and goals identified? What additional goals do you propose?***

Digicel's Response:

YES, Digicel agrees with the goals and at this time, have no further additional goals to propose

**Question: *Do you agree with the proposed approach to resolving the identified 'regulatory anomaly'. If not, what alternative (with justification) do you propose?***

Digicel's Response:

We agree with the solution. Please note however that Digicel is of the opinion that the solution is separate and apart from the implementation of local 10 digit dialling, henceforth the implementation of the LTFNS should not be delayed by the implementation of 10-digit dialling.

**Question: *What are your views on the two porting option? What treatment do you propose in relation to the questions regarding the "alternative approach"?***

Digicel's Response:

Option 1: Toll Free Number Centralized Database – Digicel is open to exploring this option as it proposes the implementation of a centralized non-partisan administrator for Toll Free porting.

Option 2: Toll Free Number Database Housed by An operator– This option is not the most desirable option for Digicel. This option allows for the possibility of exploitation by the Operator hosting the database. The Operator will now have visibility to the traffic originating on a competitor's network and as such they will now have insight into the competitor's operations and can utilize this information to gain an unfair competitive advantage.

Alternative Approach: We propose that this is the approach that should be undertaken. The reasons for suggesting this approach is the following:

1. Shortest time to implement
2. Adequate solution
3. It can be implemented using what obtains for the current local number portability platform

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We would propose that each toll free number returns the LRN for the host network. The host network will then be responsible for doing the necessary number translation. Therefore the operators can use their current Local Number Portability databases for the implementation of the LTFNS

**Question: *Do you agree with the proposals to immediately satisfy the need for full access to toll-free numbering resource. What additional or alternative steps do you propose?***

Digicel's Response:

Yes we agree with the proposal.

**Question: *What measures, if any, would you recommend to ensure that toll-free numbers are efficiently used and that warehousing and hoarding of the resources are avoided?***

Digicel's Response:

Digicel recommends that regularized reporting needs to be implemented for the LTFNS. Digicel suggests that the OUR implement a reporting policy that shows:

1. Number
2. Utilization of the number

END