FLOW's Response to the OUR's Local Toll-Free Numbering Scheme Consultation Document

November 3, 2015

1. **Introduction**

   1.1. FLOW values the opportunity to comment on the OUR's <u>Local Toll-Free Numbering Scheme Consultation Document</u> dated October 2015. In principle FLOW supports the need for an improved toll-free numbering scheme for Jamaica and considers the OUR's consultative approach to be helpful to determine adjustments that may be made to improve the current scheme. Please contact Charles Douglas at <u>charles.douglas@cwc.com</u> should you have any queries in relation to any aspect of the comments set out in this document.

2. **FLOW's Response to the questions asked within the consultation document;**

   2.1. *Question (page 16): Do you agree with the proposed LTFS and goals identified? What additional goals do you propose?*
      2.1.1. Answer: FLOW considers the goals outlined to be relevant and appropriate and covering the primary areas to be considered. However, FLOW reserves its right to make additional comments at a later time.

   2.2. *Question (page 18): Do you agree with the proposed approach to resolving the identified 'regulatory anomaly'. If not, what alternative (with justification) do you propose?*
      2.2.1. Answer: FLOW does not object to the OUR's proposal. It does appear to allow customers to continue to benefit from the use of all their currently assigned toll free numbers, while ensuring that going forward, new assignments will not be disruptive to their operations. To the extent that the customer's experience is not unduly compromised or disrupted, this proposed approach is acceptable.

   2.3. *Question (page 22): Do you agree with the proposals to immediately satisfy the need for full access to toll-free numbering resource. What additional alternative steps do you propose?*
      2.3.1. Answer: FLOW strongly agrees with and supports the OUR's proposal as set out in section 5.8. The procedures outlined in section 5.9 do appear reasonable, however FLOW reserves its right to make further comments at a later time.

   2.4. *Question (page 23): 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?*
      2.4.1. Answer: FLOW agrees in principle that the OUR should not facilitate the warehousing and hoarding of numbers. FLOW continues to study the best approaches to prevent this happening and will make specific suggestions at a later time.

End