FLOW

Comments on Review and Revision of

The Jamaican National Numbering Plan & Telecommunications Numbering Rules

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<u>Introduction</u>

The Office of Utilities Regulation's (OUR) Review and Revision Of The Jamaican National Numbering Plan & Telecommunications Numbering Rules – Phase 1 consultation document is timely and appropriate.

Flow welcomes the opportunity to participate in this consultative process. We commit to playing our part to ensure that the process is meaningful and yields the desired result(s).

Kindly direct any questions that you may have to Charles Douglas, Senior Manager, Regulatory Affairs at charles.douglas@cwc.com.

A. **Introduction of Additional Area Code**

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.
Answer: Flow agrees with the OUR's approach.

B. **Implementation of Uniform Domestic Dialling**

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

Answer: Flow does not object to the retention of the UDDP.

Question 2.3: Are there any risks in not retaining the UDDP? Please explain?
Answer: The absence of a standardized approach may create uncertainty for consumers of the service.

C. **Creation of a New Type of Number – Common Short Codes**

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?
Answer: It is both practical and prudent that these already determined matters be maintained. Since they remain in effect. Any change would require consultation and due process at a later date.

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?
Answer: Flow has no suggestions at this time.

Question2.6: Overall, how do you think the proposed JNNP presentation will benefit the industry?
Answer: Yes.

D. **Geographic Numbers**

Question 2.6: Do you agree with the proposal to retain Geographic services in their currently allocated NXXs?
Answer: Flow strongly agrees. This is importance in order to maintain certainty and to avoid unintended consequences of needlessly introducing change.

E. **Numbers for VOIP Services**

Question 2.7: What are your views on the proposed numbering of VoIP Services?
Answer: Flow agrees with the OUR's approach

Question 2.8: Are there material advantages/disadvantages with this approach?
Answer: The clear advantage is the better utilization of numbers. Since it the approach focuses on how the number is being used and not the underline technology over which the service is provided.

F. **Discontinuation of Fixed & Mobile Number Migration Plan**

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?

Answer: Yes.

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

Answer: Not now. However, current developments remain under review.

G. **Access Codes**

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

Answer: Flow agrees.

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

Answer: Flow supports this approach.

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

Answer: Flow places a high value on the use of these codes.

H. **555-Line Numbers**

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

Answer: This remains under internal review. Flow will comment in its next response.

I. **Statement on the IMSI Assignment Procedure**

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

Answer: This remains under internal review. Flow will comment in its next response.

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

Answer: This remains under internal review. Flow will comment in its next response.

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?

Answer: This remains under internal review. Flow will comment in its next response.

J. Discarding of the Rate Centre Scheme

Question 2.17: Do you see any purpose for the retention of the Rate Centre scheme as originally intended?
Answer: No. Flow agrees with the OUR's conclusion(s).

Question2.18: Do you see any purpose to which the scheme could be adapted—and not necessarily for tariffing?
Answer: No. **Furthermore, the Industry should be mindful** that any such adaptation may have unintended future consequences.

K. New Uses And Future Implications for Numbers

Question 3.1: What, in your view, are the main ways in which technological developments will influence numbering policy decisions?
Answer: This remains under internal review. Flow will comment in its next response.

Question 3.2: How and to what extent should the OUR's current and future decisions take into account such developments?
Answer: This remains under internal review. Flow will comment in its next response.

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.

Answer: Flow accepts that there is value to the proper management and supervision of the assignment and use of numbers. However, the process needs to be transparent and simple (i.e. eliminating needless bureaucracy). Flow will make additional comments in its next response.

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