



Flow's Comments on Industry
Comments to the Office of Regulation's
Consultation Document on The
Jamaican Numbering Plan and
Telecommunications Numbering Rules
Phase 1

September 2019

REASONS FOR REDACTIONS

Flow stated in the second paragraph of the introduction to this document, "...this response will focus on any area of difference, as well as **questions that were previously unanswered**" (Emphasis added). The unanswered questions referred to were Nos. 1.4 (x2), 1.5 and 1.6 in the Consultation Document, **Document Number: 2019/TEL/004/CON.002** – 2019 July 22.

The Initial deadline for the submission of responses to the "Questions" in the Consultation Document was 2019 August 16. However, the OUR granted a stakeholder's request for an extension of the date for the submission of responses, to 2019 August 30.

The OUR, therefore, considered Flow's submission of its responses to the questions, on 2019 September 13, as unacceptable for the following reasons:

1. The responses were submitted after the last published deadline and without prior OUR authorization of a deadline extension.
2. The late submission effectively denied other stakeholders the opportunity to comment on those responses.

Consequently, the responses to the questions have been redacted and will not be taken into consideration for the Office Determinations from the consultative Review and Revision of The Jamaican National Numbering Plan & Telecommunications Numbering Rules – Phase 1.

OFFICE OF UTILITIES REGULATION

Introduction

As a part of the ongoing consultation process, Flow hereby shares its comments on Industry comments published in response to the Office of Utilities Regulation's (OUR) Review and Revision of The Jamaican National Numbering Plan & Telecommunications Numbering Rules – Phase 1 consultation document.

Having reviewed the Industry responses (namely those of the CACU and Digicel), we found considerable consensus in the answers submitted to the OUR. As such, this response will focus on any area of difference, as well as questions that were previously unanswered.

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

Flow's Comments on Industry Comments

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: In response to question 2.9 Digicel correctly concluded that the transition plan *“should be formally discontinued and the “frozen” allocations released.* It thereafter mistakenly concludes that such a discontinuation would entitle it to be assigned by the OUR an “equivalent allocation” of numbers to restore equity. Flow strongly disagrees. Such a position reflects a lack of understanding of the aim of the transition plan and its intended outcome. It presupposes that the number assignments initially made to Cable and Wireless by the OUR were inappropriate and needed to be reclaimed. This is incorrect. Digicel should simply seek to be assigned numbers based on its reasonable commercial needs, any other approach will result in an inefficient assignment of numbers.

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

Answer: [Redacted]

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: [Redacted]

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

Answer: [Redacted]

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: [Redacted]

End of document

