
Office of Utilities Regulation

**Review of the Number Portability
Framework**

Consultation Document

PHASE ONE



OFFICE OF UTILITIES REGULATION

2021 November 30

Abstract

Number portability is generally viewed as an important enabler of competition in telecommunication markets. The opportunity for a subscriber to continue using a specific telephone number when changing service provider is a crucial facilitator of subscriber choice and effective competition. Number portability serves to reduce barriers to switching and makes it easier for new entrants to challenge existing market positions. Since the implementation of number portability in Jamaica in 2015, the local telecommunications landscape has experienced robust competition. Service providers offers now include diversified sets of value added services with competitive tariff packages to potentially entice the subscriber to switch to the network offering the best package to suit his/her needs.

The existing framework that governs the operations of number portability in Jamaica has not been reviewed since its implementation. As the market dynamics change over the years, it is important that the framework is reviewed to continually improve the process. Further, with the recent reports of unauthorised porting of mobile numbers, the regime is at a critical juncture requiring the implementation of additional consumer safeguards and other measures to minimise instances of fraudulent/inappropriate porting, as well as to ensure that the efficiency and integrity of the regime is uncompromised.

Consultation Process

Persons who wish to express opinions on this Consultation Document are invited to submit their comments in writing to the Office of Utilities Regulation (“OUR”) by post, facsimile or email addressed to:

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

Attention: Marsha Minott

Fax: (876) 929-3635

Email: NumberPortabilityContacts@our.org.jm

Responses are requested by 2021 December 28

Any confidential information should be submitted separately and clearly identified as such. The submission of confidential information should be accompanied by a justification in keeping with section 7(6) of the Telecommunications Act.

Responses which are not confidential pursuant to sections 7(6) and 7A of the Telecommunications Act will be posted to the OUR’s website (www.our.org.jm). Respondents are therefore requested to supply their responses in electronic form to facilitate such postings.

COMMENTS ON RESPONSES

There will be a specific period for respondents to view other responses (non-confidential) and to make comments on them. The comments may take the form of either correcting a factual error or putting forward counter arguments. As in the case of the responses, comments which are not confidential pursuant to the Telecommunications Act will be posted to the OUR’s website.

Comments on responses are requested by 2022 January 12

Arrangement for viewing responses

This Consultation Document and the responses and comments received by the OUR will also be made available to the public through the OUR’s Information Centre (“OURIC”). Persons who wish to view the Document, responses and comments should make an appointment by contacting:

**Ms. Colleen Mignott
Coordinator OURIC/Information Officer**

Telephone: (876) 968-6053
Fax: (876) 929-3635
Email: colleen.mignott@our.org.jm

Individuals with appointments should visit the OUR's offices at:

3rd Floor, PCJ Resource Centre,
36 Trafalgar Road,
Kingston 10

Photocopies of selected responses and comments may be provided on request at a price which reflects the cost to the OUR.

CONSULTATIVE TIMETABLE

The timetable for the consultation is summarized below:

<i>Event</i>	<i>Date</i>
Publish Consultation Document	2021 November 30
Responses to Consultation	2021 December 28
Comments on Responses	2022 January 12
Issue Determination by	2022 March 31

Glossary

In this document, unless the context otherwise requires, the following terms will have the meanings specified below:

1. “Act” means the Telecommunications Act.
2. “Code” means the Code of Practice for Number Portability approved by the Office of Utilities Regulation on 2015 June 19 (Document Number 2015/TEL/007/APD.001)
3. “Licensee” has the same meaning as in the Act.
4. “Office” means the Office of Utilities Regulation
5. “OUR Act” means the Office of Utilities Regulation Act
6. “Rules” means the Telecommunications (Number Portability) Rules, 2014
7. “Service Provider” has the same meaning as in the Act.

Abbreviations

ACMA	Australia Communications and Media Authority
INPG	Industry Number Portability Guidelines
NPA	Number Portability Administrator
NPWG	Number Portability Working Group
OUR	Office of Utilities Regulation
SIM	Subscriber Identity Module
SMS	Short Messaging Service
TATT	Telecommunications Authority of Trinidad and Tobago
TRAI	Telecommunications Regulatory Authority of India

Table of Contents

Chapter 1: Introduction	1
1.1 Background	1
1.2 Number Portability – the Jamaican Experience	1
1.3 The Establishment of a Working Group	3
1.4 Purpose of Document	4
1.5 Structure of the document	4
Chapter 2: Legal Framework	5
2.1 General Provisions	5
2.2 Number Portability	6
Chapter 3: Discussion of the Proposals and Modifications Proposed	8
3.1 Proposal 1	8
3.2 Proposal 2	17
3.3 Proposal 3	23
3.4 Proposal 4	24
3.5 Proposal 5	29
3.6 Proposal 6	30
3.7 Proposal 7	34
3.8 Proposal 8	39
Chapter 4: Proposals for Modification of the General Sections of the INPG	41
Chapter 5: Proposed Modifications to the INPG.....	48
5.1 Modifications based on Proposals	48
5.2 Proposed Modifications of the General Sections of the INPG	67
APPENDICES	74

Chapter 1: Introduction

1.1 Background

- 1.1.1 Number portability is now a fixture in many telecommunication markets globally. It allows consumers to move from their current service provider to a new provider of choice while maintaining their existing number. Number portability is viewed as another means of levelling the telecommunication's competitive landscape. The ease at which consumers are able to switch service providers, while maintaining their telephone number, increases their willingness to participate in the process. This also increases the competitiveness of service providers to maintain, as well as to attract new customers.
- 1.1.2 In Jamaica, number portability covers both fixed and mobile networks, and was implemented in the country in 2015 July in keeping with the provisions of the Telecommunications (Number Portability) Rules, 2014 ('the Rules'). The Rules therefore provided the regulatory framework for the enactment of number portability in Jamaica. Included in the Rules, are specifications set out at rule 42, for the establishment of a Number Portability Working Group (NPWG). The NPWG was the body responsible for the development of the specification requirements for both the technical and administrative aspects of the number portability process; the implementation scheduling; and the overall management of number portability in the country. Among its varied responsibilities, a crucial role of the NPWG was the development of the Industry Number Portability Guidelines (INPG) in accordance with rules 43 and 46. The INPG, which supplements the Rules, provides the guiding principles intended to manage the processes and activities required in the execution of the porting regime on an ongoing basis. The Rules and the INPG establish the overall framework of the operations of number portability in Jamaica.
- 1.1.3 The Office of Utilities Regulation (OUR) played an integral role in the implementation of number portability. The duties of the OUR in this process are outlined at rule 40, among others of the Rules. Of note, is the stipulation at rule 47, which charges the OUR with the responsibility of providing ongoing regulatory oversight of the number portability administration after the cessation of the NPWG. The NPWG had an expiration timeline of six (6) months post number portability implementation. Among the responsibilities given to the OUR in the capacity of regulatory oversight, is the authority to amend the INPG as is deemed necessary.

1.2 Number Portability – the Jamaican Experience

- 1.2.1 The establishment of number portability in Jamaica was aligned with the ongoing need to foster effective competition in the local market, by enabling consumers the ease of

choice of service provider, through the reduction of barriers to switching. By fostering competition, it also encourages technological innovation by the service providers as they develop new products, services and packages intended to stimulate consumer demand. This is complimented by vibrant and robust marketing campaigns by service providers indicating promotions that are intended to entice consumers to join their network, as well as to keep a firm grip on their existing subscribers.

- 1.2.2 Subscribers have actively participated in porting transactions since number portability was implemented. In fact, as at 2021 June 31, there were 13,568 porting transactions relating to fixed networks, and 757,373 porting transactions on mobile networks. The reported figures translate to approximately 3% of overall fixed subscriptions involved in porting transactions and 26% of mobile subscriptions involved in porting transactions.

Recent Challenges

- 1.2.3 In 2020 June, the OUR received a complaint from a licensee regarding seemingly fraudulent/inappropriate porting transactions by another licensee. The OUR also received a similar complaint from a consumer who contacted its Consumer and Public Affairs Department and reported an unauthorised porting transaction. To assist in its investigation of the complaints received, the OUR requested from the licensee, documentation including all Porting Request Forms and related customer identification information received for the period 2020 January 1 to 2020 June 30; all correspondence related to the complaints; and the results of any investigation conducted into the complaints. Apart from the request for documentation specific to the complaints, the OUR also requested the submission of a sample of Porting Request Forms for its review.
- 1.2.4 The OUR's investigation revealed inconsistencies in the manner in which porting activities were undertaken by service providers in relation to the provisions of the INPG and the Rules. One major inconsistency revealed by the investigation, was the ongoing activity of the initiation of porting requests at locations outside of the designated points of sale stipulated by the INPG. The INPG made reference to the service provider's retail store or authorised dealer as points of sale locations. Additionally, in its review of the Porting Request Forms, the OUR found irregularities such as:
- Incidences of multiple ports by the same individual
 - Incidences of unsigned Porting Request Forms
 - No ID provided with the Porting Request Form
 - The ID provided not matching the customer's information on the Porting Request Form
 - The signature on the Porting Request Form being different from that on the associated ID.

- 1.2.5 Tasked with the responsibility of oversight of the number portability framework, and given the need to continually improve the regime, the OUR had signalled to stakeholders its intention to review the existing number portability framework having included it in its Corporate Plan. However, the recent concerns expressed by consumers and service providers regarding aspects of the porting process; and the subsequent irregularities found by the OUR through its investigation, placed even more urgency on the need to review the framework. The review is intended to improve the efficiency of the porting process, as well as to implement measures to address the issues revealed by the investigation.

1.3 The Establishment of a Working Group

- 1.3.1 The OUR took the decision to have a similar construct for the review process as that which was established in the developmental stages of the number portability regime. Accordingly, telecommunications licensees who have been assigned numbers, and are therefore capable of participating in the number portability process (regardless of whether or not they were currently participating in the regime), were invited to nominate two representatives to participate in a working group to be established by the OUR to review the framework. Along with Licensees, representatives from the Ministry of Science Energy and Technology were also invited by the OUR to participate in the working group. The OUR was also mindful that any changes to the existing framework may likely have an impact on the operations of the Number Portability Administrator (NPA), and as such, the entity was also invited to participate in the working group.
- 1.3.2 Members of the working group were requested to submit proposals to the OUR regarding any changes/modifications that were considered necessary to improve the existing number portability framework. Along with any proposals submitted, the OUR required that the relevant justification be submitted for each proposal, indicating its benefit to the process and any perceived detriment if the proposed change was not included in the framework.
- 1.3.3 In addition to the request for proposals, the OUR also requested that the NPA indicates how any proposal would impact its operations, including any cost implications. Information from the NPA in this regard would factor into the discussion of each proposal wherever a likely cost implication was identified.

Phased Consultation Approach

- 1.3.4 The OUR received proposals from Licensees regarding modifications to the existing framework. While the proposals predominantly require modifications to the INPG, there are some which will also require changes to specific provisions in the Rules. The OUR,

while having autonomy over any modification it determines for the INPG, does not have the same authority in relation to the Rules. As the Rules fall within the remit of the responsible Minister, any proposal accepted after discussions that impacts the Rules, cannot be implemented by the OUR. These proposals can only be presented in the form of recommendations to the Minister for a decision on whether the specific Rules that they impact would be modified accordingly.

- 1.3.5 Given the foregoing delineation of authority in regard to the INPG and the Rules, and in light of the need to promptly address some of the issues brought forward by the licensees, the OUR took the decision to do the consultation in three (3) phases. In this approach, the OUR will focus on the issues that singularly affect the INPG which it has the authority to modify in phase one (1) of the consultation. Phase two (2) of the consultation will focus on the issues that will require modification to the Rules.
- 1.3.6 It is further recognised that any modifications made to the INPG and the Rules, may necessitate conforming modifications to the Code of Practice issued pursuant to rule 44 of the Rules. After completion of the phase 1 and phase 2 consultative processes, in phase 3, a review of the Code of Practice will be undertaken and amendments made, where appropriate, pursuant to rule 47 of the Rules.

1.4 Purpose of Document

The document lays out proposals for discussion regarding the intended Phase one modification of the current framework that governs the number portability regime.

1.5 Structure of the document

- **Chapter 2** outlines the Legal Framework that underscores the remit of the OUR in regard to the telecommunications sector, as well as the OUR's ongoing role of regulatory oversight for the number portability regime.
- **Chapter 3** outlines the OUR's proposals and those of the licensees that impact the INPG only; as well as proposed modifications to the INPG including those that were not a part of the initial proposals.
- **Chapter 4** outlines general sections of the INPG that the OUR proposes to update to reflect the current realities of the porting process.
- **Chapter 5** lists the proposals and proposed modifications to be made throughout the INPG.

Chapter 2: Legal Framework

2.1 General Provisions

- 2.1.1 The OUR was established under the Office of Utilities Regulation Act (OUR Act) with the power to regulate “prescribed utility services.” Section 2 and the First Schedule of the OUR Act define “prescribed utility services” to include “*the provision of telecommunication services.*”
- 2.1.2 The power and authority of the OUR to regulate the telecommunications sector is governed by the provisions of the OUR Act and the Telecommunications Act (“the Act”).
- 2.1.3 Section 4(1) of the OUR Act permits the OUR to, among other things:
- “ ...
- (a) *regulate the provision of prescribed utility services by licensees or specified organizations;*
-
- (c) *conduct such research as it thinks necessary or desirable for the purposes of the performance of its functions under this Act;.*”
- 2.1.4 Section 4(3) of the OUR Act empowers the OUR to undertake such measures, as it considers necessary and desirable, to inter alia:
- “(a) *encourage competition in the provision of prescribed utility services;*
- (b) *protect the interests of consumers in relation to the supply of a prescribed utility service;*
- ...
- (d) *promote and encourage the development of modern and efficient utility services;*
- ...”
- 2.1.5 The Act also grants the OUR general regulatory oversight of the telecommunications sector, as well as provides for specific powers to the OUR regarding certain areas of focus, including but not limited to, promotion of competition, quality of service standards and consumer protection in the provision of telecommunications services. Some of the relevant provisions of the Telecommunications Act in this regard are as follows:

“4.- (1) The Office shall regulate telecommunications in accordance with this Act and for that purpose the Office shall –

(a) regulate specified services and facilities;

...

(d) promote the interests of customers, while having due regard to the interests of carriers and service providers;

...

(f) make available to the public, information concerning matters relating to the telecommunications industry;

(g) promote competition among carriers and service providers;

...

(3) In exercise of its functions under this Act, the Office may have regard to the following matters –

(a) the needs of the customers of the specified services;

(b) whether the specified services are provided efficiently and in a manner designed to –

...

(iii) afford economical and reliable service to its customers;

(c) Whether the specified services are likely to promote or inhibit competition.”

2.2 Number Portability

2.2.1 The Act provides for the implementation of a number portability regime by the responsible Minister. Rules imposing number portability obligations have been issued pursuant to section 37 of the Act. Specifically, Section 37(1) states:

The Minister may after consultation with the Office make rules imposing on any public telecommunications carrier the responsibility to offer number portability.

2.2.2 The Telecommunications (Number Portability) Rules, 2014 (the “Rules”) require, subject to certain exemptions, that every public telecommunications carrier offer number

portability. The Rule make provision for various duties of carriers with respect to the facilitation of number portability, and sets out, among other things, the framework within which the porting process should be conducted.

- 2.2.3 A Code of Practice and the INPG were developed in accordance with the provisions of rule 43(1)(b) and 46 of the Rules. The Code and INPG detail, among other things, the duties and responsibilities of licensees to each other and to their customers, and the procedures applicable to the porting of numbers. Rule 47 gives the OUR the authority to provide ongoing regulatory oversight of the number portability administration and to amend the INPG and Code periodically. The rule states:

“47. The Office shall provide ongoing regulatory oversight of number portability administration and may, from time to time and, after the Group ceases to exist, amend the –

(a) Code of Practice;

(b) Industry number portability guidelines...”

Chapter 3: Discussion of the Proposals and Modifications Proposed

3.1 Proposal 1

- (a) Amend the INPG to make it clear that the Porting Request Form must include:**
- **the name and signature of the service provider's representative undertaking the validation process**
 - **the specific location at which the porting process was initiated**
- (b) Amend the INPG to specify that the recipient service provider shall verify that the signature on the identification provided by the person requesting the port matches the signature provided on the Porting Request Form.**
- (c) Amend the INPG to require the inclusion of a set of mandatory information that must be included on the Porting Request Form.**
- (d) Amend the INPG to increase the time period for retention of customer porting transaction details.**

3.1.1 Following the OUR's investigation in the reports of fraudulent/inappropriate porting in the number portability process, the irregularities found and the discussions that ensued in the working group, the OUR finds it imperative that more consumer safeguards are implemented to protect against such recurrences. Accordingly, the OUR has submitted the foregoing proposals and is of the view that they are necessary modifications that will help to strengthen the porting process by acting as a deterrent to any attempt to abuse it. Further, in the event that there is a case of fraudulent/inappropriate porting, the inclusion of such critical information on the porting authorization form will assist in the investigative process.

3.1.2 The objective of making number portability a simple and efficient process is not lost on the OUR. However, as a regulator, the OUR must ensure that while the process is efficient, the welfare of consumers is protected. From its research on the porting process in different jurisdictions, the OUR has observed that in many countries the focus of the number portability process is not centred around details such as how the customer's request should be received, verified and processed for authorization. While this might be the case in most jurisdictions, there are countries in which the regulator, although mindful of the importance of the efficiency of the process, also ensures that there is an

added layer of security from the initial stages of a request to port. For example, in India, the Telecommunication Regulatory Authority of India (TRAI) stated in its notification on mobile number portability regulations that to implement mobile number portability successfully, the process must be “simple, easy and speedy for the subscriber.”¹ Notwithstanding its statement, in its 2019 consumer guidelines² TRAI specified that along with the requirement for consumers to complete a Customer Acquisition Form, and a Porting Form as part of the eligibility process, a unique porting code (UPC) sent by the donor operator after the customer sends an SMS requesting to port, must also be submitted to facilitate the process. The Telecommunications Authority of Trinidad and Tobago (TATT) in its porting request form, found in its number portability customer procedures³, included a section where the customer service representative undertaking the porting request must:

- Print his/her name as the person who undertook the porting request
- Confirm that the customer’s number was verified
- Confirm that the customer’s ID was checked and a copy retained
- Sign the end of the form and also affix the company’s stamp

3.1.3 While the OUR’s proposals are similar to the foregoing measures implemented by Trinidad and Tobago, the OUR’s proposal at 1(b) is intended to go further with validating the request by making it explicitly clear that both signatures should match. During the investigation of fraudulent/inappropriate porting, the OUR noted that a significant proportion of the porting forms submitted to facilitate the investigation, had initials purportedly made by the customer as the signature included on the form, while the signature on the ID provided had most or all of the customer’s name written. While it is plausible that the customer could have decided to simply affix his/her initial to the form, it is the OUR’s view that if the process insists on a matching of signatures, this will provide an added layer in authenticating the identity of the person making the request to port. The OUR is mindful that service providers or their representatives are not handwriting experts. Accordingly, the process being proposed of checking/matching of signatures would be similar to that which is carried out by representatives of a banking/financial institution in the processing/validating of cheques, vouchers and other instruments of value in which the signature on the instrument is matched against that which they have on file for the customer. In the case of porting, it is proposed that the recipient service provider’s representative should observe whether the signature of the

¹ TRAI, Telecommunication Mobile Number Portability Regulations (2009) Notification

² TRAI, Customer Guide for Availing the Facility of Mobile Number Portability. Available at: https://www.trai.gov.in/sites/default/files/Customer_Guide.pdf

³ Number Portability in the Republic of Trinidad and Tobago. Customer Procedures – November 2015.

customer on the Porting Request Form resembles the signature on the ID presented by the customer.

3.1.4 It was argued by at least one service provider, that a customer's signature could change over time due to a physical disability/impairment that had not previously existed. Examples of such impairment were given to include the loss of sight or the maiming of the hand that would normally have been used to formulate the signature. Although noting that this particular issue can indeed arise, it is however the OUR's view that such occurrences are likely to be the exception rather than the norm. Notwithstanding the foregoing, if such a situation arises, it is proposed that the service provider's representative verifying the customer's information at the porting request initiation stage, should include on the Porting Request Form the relevant notation/comments specific to the disability/impairment that prevented the customer from providing a signature that is similar to that on the supporting ID and witness the mark of the customer.

3.1.5 As it relates to the proposal for the specific location where the porting request was initiated, the information included on the Porting Request Form must provide details of the geographic location. The OUR has also included a set of additional mandatory information that must be included on the Porting Request Form, which is aimed at protecting the customer. The new mandatory information on the Porting Request Form include the date of signature by the customer, the location at which the porting request was initiated, the name and signature of the service provider's representative, the date of signature of the form by the service provider's representative, and confirmations by the service provider's representative that:

- The customer's signature on the identification matches the signature provided on the porting request form.
- He/She has witnessed the mark or signature of the customer.
- The service requested by the customer can be provided.
- All required information is collected to satisfy that the customer is authorised to port the number.
- The prepaid customer, if applicable, was advised that any remaining credit on the current service will be forfeited.
- The customer was advised that all data stored in relation to the current network related services (such as in mailboxes) will expire automatically when porting takes place.
- The customer was informed (for fixed number porting) that an email account or a mobile phone is required as a prerequisite to enable the receipt of messages relating to the progress of the port.

- 3.1.6 The proposed modified template for the Porting Request Form can be found in Appendix 1 of this document.
- 3.1.7 In light of the possibility of investigations and other inquiries that may be triggered by allegations of fraudulent or inappropriate porting transactions, disputes, complaints or breaches of applicable law it is recognized that the six (6) month retention period for porting records may be inadequate. A longer retention period is necessary to facilitate access to original documentation where investigations, inquiries and processes may extend beyond the current six (6) month period. It is further proposed that the retention obligation be extended to all porting records, and not just the identification information, as currently specified in the INPG. A definition of “porting records” would then be included in the glossary of terms in Appendix F of the INPG to indicate that porting records include the Porting Request Form, supporting documentation, and correspondence between the service providers, and between the customer and service providers in connection with a porting request. It is proposed that recipient service providers retain porting records for a minimum period of twenty-four (24) months.

Impact of the Proposal on the INPG

- 3.1.8 The inclusion of Proposal 1(a) in the INPG will require the insertion of new provisions. The existing provisions at 13.2(ii), A.1.4(ii), A.14.4(v), B.1.4(ii) and B.14.4(v) of the INPG would have to be modified to capture the new requirement proposed at Proposal 1(b). For proposal 1(c) the existing provisions at 12.1.5, 13.2(i), A.1.4(i), A.14.4(iv) B.1.4(i) and B.14.4(iv) would have to be modified to indicate that a set of mandatory information is included on the Porting Request Form. The Porting Request Form template in appendix H of the INPG would also have to be modified.

The following modifications are proposed to the INPG to capture Proposal 1:

- 3.1.9 Modify section 12.1.5 and insert a new 12.1.6 and 12.1.7 as follows:
- 12.1.5 The customer signs the Porting Request Form, the form of which can be found in Appendix H. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification.*

12.1.6 The representative of the recipient service provider executing the validation of the request to port completes the confirmations on the Porting Request Form, prints his/her name on the Porting Request Form and signs and dates the form.

12.1.7 The mandatory information indicated on the Porting Request Form must be completed by the customer and the representative of the recipient service provider as applicable.

3.1.10 The appropriate renumbering of the unmodified paragraphs of section 12 (that is the current 12.1.6 to 12.1.18) would be done to accommodate the inclusion of the proposed new clauses.

3.1.11 Modify paragraph 13.2 to amend sub-paragraphs i. and ii. and add two additional provisions, as sub-paragraphs iii. and iv. as follows:

13.2 The recipient service provider shall undertake the following validation steps:

- i. Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary;*
- ii. Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records for*

a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.

- iii. Ensure that the representative of the recipient service provider that is executing the validation of the request to port prints his/her name on the Porting Request Form, confirms on the form that the steps at 12.1.3 and 12.1.4 were undertaken, and signs and dates the form.*
- iv. Ensure that the location of the point of sale where the porting request was initiated is recorded on the Porting Request Form.*

A.1.4 The recipient service provider shall satisfy itself that the customer requesting the port of a number is authorized to do so. The recipient service provider will undertake the following validation steps:

- i. Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary;*
- ii. Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records for a period of at least*

twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.

- iii. Ensure that the representative of the recipient service provider that is executing the validation of the request to port prints his/her name on the Porting Request Form, confirms on the form that the steps at 12.1.3 and 12.1.4 were undertaken, and signs and dates the form.*
- iv. Ensure that the location of the point of sale where the porting request was initiated is recorded on the Porting Request Form.*

A.14.4 The recipient service provider shall:

...

- iv. ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. The Porting Request Form is also the legal instrument appointing the recipient service provider as its agent to port its number from the donor service provider and close its account if necessary;*
- v. Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.*

...

- vii *Ensure the representative of the recipient service provider that is executing the validation of the request to port prints his/her name on the Porting Request Form, confirms on the form that the steps at 12.1.3 and 12.1.4 were undertaken, and signs and dates the form.*
- viii *Except where the porting request is initiated electronically, ensure that the location of the point of sale where the porting request was initiated is recorded on the Porting Request Form.*

B.1.4 The recipient service provider shall satisfy itself that the customer requesting the port of a number is authorized to do so. The recipient service provider will undertake the following validation steps:

- i. *Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary;*
- ii. *Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.*

- iii. *Ensure that the representative of the recipient service provider that is executing the validation of the request to port prints his/her name on the Porting Request Form, confirms on the form that the steps at 12.1.3 and 12.1.4 were undertaken, and signs and dates the form.*
- iv. *Ensure that the location of the point of sale where the porting request was initiated is recorded on the Porting Request Form.*

B.14.4 The recipient service provider shall:

...

- iv. *Ensure that the customer completes and signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. The Porting Request Form is also the legal instrument appointing the recipient service provider as its agent to port its number from the donor service provider and close its account if necessary;*
- v. *Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.*

...

- vii *Ensure the representative of the recipient service provider that is executing the validation of the request to port prints his/her name*

on the Porting Request Form, confirms on the form that the steps at 12.1.3 and 12.1.4 were undertaken, and signs and dates the form.

viii Except where the porting request is initiated electronically, ensure that the location of the point of sale where the porting request was initiated is recorded on the Porting Request Form.

- 3.1.12 Note that it is proposed that the provisions of A.14.4 and B.14.4 not mentioned above would remain as in the current INPG unmodified.

3.2 Proposal 2

Amend the INPG to make it clear that the Porting Request Form may either be hard copy or represented as a soft copy on an electronic device.

- 3.2.1 Service providers were of the view that the INPG should make it clear that the Porting Request Form is not restricted to a physical paper form. They noted that many businesses and institutions are moving from paper-based transactions/filings to a paperless means of doing business where possible. As such, they were of the opinion that they should be given the flexibility to utilise electronic devices to capture the customer's information at the outset. They expressed the concern that the requirement to retain the Porting Request Form for at least six (6) months creates a challenge for adequate physical storage needed to meet the ongoing porting requests that are processed. It is their position that the use of electronic devices is a more practical solution to the use of paper forms. As the use of electronic devices to complete the form would translate to the customer providing an electronic signature, service providers would like the INPG to explicitly state that an electronic signature is accepted in the process.

The OUR's Assessment

- 3.2.2 The OUR is mindful of the changes taking place locally, and indeed globally, in the drive to go paperless from an environmental standpoint as well as the potential efficiencies that can be achieved overall through the use of electronic devices. In the current case, the use of these devices to complete, upload and store the Porting Request Forms may prove cost effective in terms of storage and retrieval of information.
- 3.2.3 The OUR also acknowledges the provisions of the Electronic Transactions Act of 2006 ("the Electronic Transactions Act"), which provides for the acceptance of electronic signatures in Jamaica. An 'electronic signature' as defined by the Electronic Transactions Act, means information that is contained in, attached to or logically

associated with, an electronic document; and is used by a signatory to indicate his adoption of the content of that document. The definition however specifically excludes any signature produced by a facsimile machine or by an electronic scanning device.

- 3.2.4 Notwithstanding the legality of electronic signature, the OUR is concerned that the issue of mismatching of signatures on the Porting Request Form and the ID presented may arise in instances where due care is not exercised by the customer in how the signature is made using the electronic pen or other writing apparatus affixed to the device. There may also be instances where the type of writing apparatus provided, despite the efforts of the customer, does not allow the customer the ease of making his/her signature in the manner accustomed. In its investigation of reported incidents of fraudulent/inappropriate ports, the OUR noted that a significant number of the Porting Request Forms reviewed had a different styled signature compared to the ID submitted. One explanation given to the OUR as a contributing factor to the mismatched signatures was the use of electronic devices such as a tablet, in the completion of the Porting Request Form.
- 3.2.5 In researching whether other jurisdictions allow the use of electronic devices to submit a porting request, the OUR observed that the regulations in most jurisdictions while making reference to the customer completing a form as a part of the porting request initiation, do not specify the format of such form. In jurisdictions such as India, the regulations reserve the format of the porting request to the discretion of the Recipient Operator. TRAI's mobile number portability regulations stipulate that the customer wishing to port his/her number must make the request in writing in such format as specified by the Recipient Operator⁴. It is therefore left up to the Recipient Operator to decide on the format to be utilised, electronic or otherwise, to engage the customer in the porting process. The Australian Communications and Media Authority (ACMA), in its Telecommunications (Mobile Number Pre-Porting Additional Identity Verification) Industry Standard 2020, includes the option for the porting request to be made online⁵. Accordingly, the porting request information that is submitted by the customer in this manner would be in an electronic format, including any requirement for the customer to include a signature.
- 3.2.6 The OUR although expressing concern about possible issues regarding the manner in which customers sign on the electronic devices, nevertheless agrees to the practicality of the use of electronic devices to aid in the efficiency of the porting request process. The OUR also notes the position taken by other regulatory agencies to allow the recipient service provider the flexibility to decide how the information from the customer should be received. The OUR supports the proposal to modify the INPG to indicate that the

⁴ See supra note 1

⁵ Australian Communications and Media Authority Telecommunications (Mobile Number Pre-Porting Additional Identity Verification) Industry Standard - February 2020. Available at: <https://www.legislation.gov.au/Details/F2020L00179>

Porting Request Form can be in an electronic format. Notwithstanding the OUR's support of the proposal, the recipient service provider or its representative **MUST** ensure that in the absence of any disability rendering the customer unable to make the same signature or mark on the documentation signifying his/her intent to port, as that on the identification presented, both signatures must match. As mentioned above, electronic devices do not allow the customer to accurately replicate his/her signature. In order to address this challenge, it is proposed that the customer be required to write his or her signature or mark on a paper form in addition to the completion of the Porting Request Form on the electronic device. As in the case of the customer's signature on the paper Porting Request Form, the service provider representative will be required to verify that the customer's signature on the paper form matches the signature on the ID. Note also that where customer has to make a mark due to a disability/impairment, the service provider representative verifying the customer's information at the porting request initiation stage, must include on the Porting Request Form the relevant notation/comments specific to the disability/impairment that prevented the customer from providing a signature that is similar to that on the supporting ID.

Impact of the Proposal on the INPG

- 3.2.7 The OUR is of the view that the INPG should be modified to reflect the new requirements that the Porting Request Form may be paper-based or in an electronic format.

The following modifications are proposed to capture Proposal 2

- 3.2.8 It is proposed that further modifications be made to sub-paragraphs 12.1.5, 13.2(i), A.1.4(i), A.14.4(iv), B.1.4(i) and B.14.4(iv) as follows.

12.1.5

- i. A paper-based or electronic Porting Request Form shall be completed, the form of which can be found in Appendix H.*
- ii. In the case of a paper-based Porting Request Form, the customer signs the Porting Request Form. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification.*
- iii. In the case of an electronic Porting Request Form, the customer signs the Porting Request Form as well as a paper-based register upon which the customer's name, date, telephone number, and service provider representative's*

name will be recorded (the Porting Register). Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark on the Porting Register, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification.

- 13.2(i) Ensure that the customer signs the Porting Request Form indicating an intent to port. In the case of an electronic Porting Request Form the customer shall also sign a paper-based register upon which the customer's name, date, telephone number, and service provider representative's name will be recorded. The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary;*

A.1.4

- i. Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. In the case of an electronic Porting Request Form the customer shall also sign a paper-based register upon which the customer's name, date, telephone number, and service provider representative's name will be recorded (the Porting Register). The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary.*
- ii. Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form or the Porting Register is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider*

is required to retain the Porting Records and the Porting Register for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.

A.14.4

...

- iv. *Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. In the case of an electronic Porting Request Form the customer shall also sign a paper-based register upon which the customer's name, date, telephone number, and service provider representative's name will be recorded (the Porting Register). The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary.*
- v. *Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form or the Porting Register is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records and the Porting Register for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.*

...

B.1.4

- i. *Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. In the case of an electronic Porting Request Form the customer shall also sign a paper-based*

register upon which the customer's name, date, telephone number, and service provider representative's name will be recorded (the Porting Register). The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary.

- ii. *Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form or the Porting Register is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records and the Porting Register for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.*

B.14.4

...

- iv. *Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. In the case of an electronic Porting Request Form the customer shall also sign a paper-based register upon which the customer's name, date, telephone number, and service provider representative's name will be recorded (the Porting Register). The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary.*
- v. *Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the*

Porting Request Form or the Porting Register is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records and the Porting Register for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.

3.3 Proposal 3

Amend the INPG to include the requirement of proof of address as part of the validation.

- 3.3.1 It was proposed by a service provider that the INPG be amended to provide for a secondary method of verifying the identity of the customer authorising the port through independent proof of their usual residential address. The service provider took the position that this addition will assist in the mitigation of theft and fraud by strengthening the validation process, given the relative ease at which a number can currently be ported by a customer.
- 3.3.2 Another service provider however disagreed with the proposal put forward citing that the proposal in its current form was unworkable, and that of proof of address should be utilised as a part of a Know Your Customer (KYC) requirement. It was further stated that the option of uniform “Know Your Customer” requirements (KYC) should be explored. Notwithstanding, it was also the view of the service provider that any such KYC was a matter that should be dealt with separately as it did not fall within the scope of the number portability review.

The OUR's Assessment

- 3.3.3 The OUR notes the proposal put forward but is however of the view that the inclusion of proof of address as an additional layer of identity verification, may prove challenging for some customers wishing to port their number. This would likely be the case in instances where the requisite proof of address such as utility bills, may not be available where the customer is not the account holder of such services at his/her current residence. In the case of rentals, there might be some lease arrangements wherein the utilities

remain in the name of the property owner. There is also the case of young adults who reside with parents and would not be the account holders of bills at the residence. The OUR is also mindful of the social challenges in Jamaica which contribute to pockets of informal settlements across the island. It is unlikely that persons living in these informal settlements would be able to provide proof of address to permit a porting request. Even in instances where the customer would be the account holder by virtue of having a mobile subscription, the majority of these customers have a prepaid service, and as such would not have been receiving bills.

- 3.3.4 Given the foregoing assessment, the OUR is of the view that the proposal to include proof of address as a part of the validation of the request to port does not benefit the number portability process. The OUR agrees that the requirement of Know Your Customer requirements is better served if explored in a context outside of the current number portability framework review.

3.4 Proposal 4

Amendment of the INPG to outline a Transparent Repatriation Process

- 3.4.1 In its review of the INPG, the OUR observed that it does not currently provide sufficient details to clearly outline the process of repatriation. It is the OUR's view that an appropriate repatriation process should be detailed in such a manner that ensures the customers and service providers are protected. A transparent repatriation process will, among other things, provide clarity on what would constitute fraudulent and inappropriate porting. If left unchecked, it could severely undermine the integrity and credibility of the number portability process in the market. The OUR is mindful that the repatriation of a number must be done quickly to ensure that the integrity of the number portability process is maintained. For this to be accomplished, clear procedures to facilitate repatriation need to be outlined. As repatriation should only be allowed in very stringent circumstances, the process should indicate, among other things, the conditions under which repatriation will be permitted. In the case of repatriation due to fraudulent/inappropriate porting of a customer's number, the repatriation process must clearly state what constitutes a fraudulent/inappropriate port to trigger the process.
- 3.4.2 Further, the OUR is concerned that there is currently a lack of timelines for the investigation of a complaint of a potential fraudulent/inappropriate port. A complaint of this nature would not fit in the 'Management of Customer Complaints' outlined in paragraph 8 of the INPG, nor would the timelines given be considered suitable for what should be treated with urgency. Where the investigation becomes protracted, this would

likely be to the detriment of the customer, who can be without his/her service on his/her desired network for an extended period. Out of frustration with the process, the customer may decide to stay on the recipient service provider's network, or at least until the ninety (90) day porting restriction period has expired, or depending on the circumstance may 'lose' his number. The OUR is also of the view that given the urgency required in cases of fraudulent or inappropriate porting transactions that the dispute resolution procedures under paragraph 9 would not be considered suitable. In this instance, the dispute should be referred directly to the OUR for resolution, rather than the dispute resolution procedures under paragraph 9 as is specified in the current sub-paragraph 18.7. The dispute resolution procedures under paragraph 9 requires that the parties first engage in good faith negotiations for up to fifteen (15) working days before referring the matter to the OUR. This first step is unnecessary as the good faith engagement between the donor service provider and recipient service provider would already have ended in disagreement. Also the time period set out in paragraph 9 would cause further delays in addressing the otherwise urgent matter of a repatriation request. Therefore, in order to ensure that repatriation is treated with urgency, the OUR is of the view that the process must set out the order in which each participant shall take a particular action, and the timeframe in which the action shall be taken.

Impact of the Proposal on the INPG

- 3.4.3 To facilitate the proposal, modifications will be required to various provisions under paragraph 18 of the INPG which allows for emergency repatriation.

The proposed modifications to section 18 of the INPG are detailed below.

- 3.4.4 It is proposed that sub-paragraph 18.1 be modified to include the requirement for the number to be repatriated promptly and in a manner as if the number had not been ported as follows:

18.1 Repatriation comprises the return of a customer's ported number to the donor service provider, and in a manner to ensure the restoration of all routing as if the number had not been ported. Repatriation is not time-bound and can be invoked at any time by a customer who is able to demonstrate that the ported number is assigned to him and has been ported without his consent. Repatriation must be done promptly and in accordance with the provisions of this paragraph 18.

- 3.4.5 It is proposed that sub-paragraph 18.2 be modified to include the timelines within which the donor service provider should act once a complaint of fraudulent/inappropriate porting is received as follows:

18.2 The donor service provider shall request the recipient service provider to provide copies of the Porting Request Form and associated identification documentation used to initiate the particular porting transaction within one (1) working day of receipt of the complaint of a fraudulent or inappropriate porting transaction.

- 3.4.6 It is proposed that a new provision be included as paragraph 18.3 which indicates the timeline within which the recipient service provider must respond to the donor service provider's request as follows:

18.3 The recipient service provider shall provide the information requested by the donor service provider within one (1) working day of receipt of the request.

- 3.4.7 It is proposed that the existing paragraph 18.3 be renumbered as 18.4, and modified to reflect the timeline within which both the donor and recipient service provider shall complete their investigation into a complaint of a fraudulent or inappropriate porting transaction as follows:

18.4 The donor service provider and the recipient service provider shall work in good faith to complete the investigation into reported incidents of fraudulent or inappropriate porting transactions within three (3) working days of having received the requested information (in the case of the donor service provider) or having provided the requested information (in the case of the recipient service provider), and promptly report their findings to the NPA.

- 3.4.8 It is proposed that a new provision be included as paragraph 18.5 outlining the circumstances under which a porting transaction may be considered to be fraudulent or inappropriate.

18.5 The following circumstances may constitute fraudulent or inappropriate porting:

- *Inconsistency between the mandatory porting data outlined in A.1.7 and B.1.7 included on the Porting Request Form and the customer information held by the donor service provider.*
- *A Porting Request Form that is not signed by both the customer and the service provider representative.*
- *The name on the customer identification submitted at the time of the initiation of the porting process does not match the information on the Porting Request Form.*
- *The signature on the customer identification submitted at the time of the initiation of the porting process is different from that of the customer on the Porting Request Form or Porting Register, except where the customer makes a mark in the circumstances specified in sub-paragraph 13.2 ii.*
- *There is no record of a valid, acceptable and unexpired proof of identity of the person requesting the port and the person submitting the request where necessary, and*
- *Any other circumstances in which the customer can demonstrate that the number was ported without his/her consent.*

3.4.9 It is proposed that the automated repatriation process set out in Appendix 2 of this document be included as a new Appendix J in the INPG. Additionally, the existing sub-paragraphs at 18.4 and 18.5 may be consolidated, renumbered as 18.6 and modified to include the timeline within which the repatriation must be completed using the automated repatriation process in Appendix J. The modified sub-paragraph may be as follows:

18.6 Where porting transactions are subsequently determined to be fraudulent or inappropriate, the numbers involved shall be repatriated promptly, to the donor service provider within 24 hours of the said determination using the automated repatriation process outlined in Appendix J.

3.4.10 It is proposed that the existing provision at sub-paragraph 18.6 be deleted as it is no longer necessary given the new repatriation process in Appendix 2 of this document that is being proposed for inclusion in the INPG.

- 3.4.11 It is proposed that the existing provision at sub-paragraph 18.7 be modified to reflect that the matter must be referred to the OUR where the donor service provider and the recipient service provider cannot reach agreement as to the status of the porting transaction, that is whether or not it is fraudulent or inappropriate. The proposed amendment is as follows:

18.7 Where the donor service provider and the recipient service provider cannot reach agreement as to the status of the porting transaction, that is whether or not it is fraudulent or inappropriate, within five (5) working days of receipt of the customer's complaint, either party may refer the dispute to the Office for a resolution. If the Office determines that the porting transaction was fraudulent or inappropriate, the automated repatriation process set out in Appendix J shall be applied.

- 3.4.12 It is proposed that a new provision be included as sub-paragraph 18.8 which outlines what the OUR will require where the service providers cannot reach an agreement in their investigation of a complaint regarding an alleged fraudulent or inappropriate porting transaction, and the matter is referred to the OUR for a resolution. The proposed new provision is as follows:

18.8 Where the dispute referenced at sub-paragraph 18.7 above is referred to the Office for resolution, the following shall be provided to the Office along with the referral:

- *Copies of all documents that were required for the initiation of the porting request (where available in the case of a referral from the donor service provider).*
- *Copies of all correspondence, where available, between the customer and the service provider regarding the complaint, and any documents submitted.*
- *Copies of correspondences between the donor service provider and recipient service provider regarding the complaint and its investigation.*
- *Copies of the results of the investigations carried out by the service providers into the complaint.*
- *Any other information as may be requested by the Office from time to time.*

3.4.13 As the existing and proposed procedures and timelines for customer complaint handling and disputes between the service providers in respect of allegations of fraudulent or inappropriate porting differ from those specified in the provisions which generally address the management of customer complaints and dispute resolution, it is proposed that the general provisions be modified to expressly exclude complaints and disputes relating fraudulent or inappropriate porting, and instead reference the procedures in this regard as set out in paragraph 18 of the INPG.

3.4.14 It is therefore proposed that new clauses be included in paragraphs 8 and 9 of the INPG as follows:

8.7 *Notwithstanding the foregoing provisions, customer complaints relating to alleged fraudulent or inappropriate porting shall be subject to the procedures set out in paragraph 18.*

9.3 *Notwithstanding the foregoing provisions, disputes between service providers concerning complaints or investigations of fraudulent or inappropriate porting shall be addressed in accordance with the provisions in paragraph 18.*

3.5 Proposal 5

Amend the INPG to reflect an automated repatriation process.

3.5.1 The service providers expressed the concern that the repatriation process should be automated to ensure the efficiency of the process. The current manual system requires coordination between the donor service provider and the NPA personnel, as the NPA's help desk will need to bypass the SMS/IVR validation and ninety (90) day subsequent porting restriction checks to facilitate emergency repatriation of numbers. According to them, this type of manual process has proven to be tedious and time-consuming for the service providers as any agreed window that is missed by any of the parties will require the rescheduling of the repatriation.

The OUR's Assessment

3.5.2 The OUR agrees that an automated repatriation process will improve the efficiency of the number portability process. Following the concerns of the service providers regarding the manual process, the NPA was contacted with respect to any upgrades that

may be required to the system to facilitate the automation of process. The OUR was subsequently informed by the NPA that there was already a repatriation process in its Import number portability platform that could be activated and utilised, and as such there would be no cost to the service providers. The details of this process is included in Appendix 2 of this Consultation Document.

Impact of the proposal on the INPG

- 3.5.3 The modifications proposed earlier to be made to the consolidated provision (18.4 and 18.5) at sub-paragraph 18.6 adequately address this proposal, as they speak to the number being repatriated in accordance with the automated repatriation process outlined in the proposed new Appendix J of the INPG.

18.7 Where it is determined that a porting transaction is fraudulent or inappropriate the number(s) shall be returned to the donor service provider using the emergency repatriation process outlined in Appendix J.

3.6 Proposal 6

- (a) Permit a porting request to be initiated at additional locations designated by the service provider that is outside of the prescribed points of sale.**
- (b) Amend the INPG to remove any ambiguity regarding the definition of a point of sale.**

- 3.6.1 A service provider raised a concern that the initiation of porting requests should be permitted at locations other than a retail store and authorised dealer, which are identified as points of sale in the INPG. The view was expressed that additional point of sale locations designated by the service provider, at which the intended customers can be reached, should be included. According to the service provider, permitting the designation of additional locations is a means of prioritizing the accessibility of the service, and adds to the convenience customers will have in their ability to engage in such transactions from various locations. It is the service provider's opinion that failure to modify the INPG to include additional locations could result in negative commercial and financial impact on service providers.

- 3.6.2 While one service provider requested that the provision regarding points of sale be reviewed to extend the reach to customers, another service provider was of the view that the provision in the INPG relating to how a porting request was initiated required clarity in relation to the propriety of the use of field representatives. The service provider was

of the view that in the absence of clarity, operators may form the view that porting can be initiated at places other than a point of sale.

The OUR's Assessment

- 3.6.3 The OUR has observed through its research that the manner in which a porting request is initiated is not detailed in most jurisdictions. The regulations governing number portability in many countries mostly speak to the customer making the request to port by visiting the service provider's store. Where there are supplementary guidelines to these regulations, no further details are included regarding the location at which the porting request is initiated. In Australia however, the Additional Pre-Porting Identity Verification Requirements⁶ outlines the various options that a customer can utilise to initiate a request to port. These were given as at a retail store, through a call centre, or by submitting the request online. Notwithstanding the options provided, it is the customer who contacts the service provider in each option to initiate the porting request.
- 3.6.4 The current proposal to extend the initiation of a porting request to locations in addition to retail stores and authorised dealers in the INPG, emerged from the unsanctioned actions of the service providers who were soliciting ports from customers at locations outside of these designated points of sale. In its investigation of fraudulent or inappropriate porting transactions, the OUR received reports from affected customers who informed that they were approached by the service provider's representatives at various locations that were not the designated points of sale. These complainants lamented that they were unaware that they were engaging in any porting activity, as when approached by the service provider's representative, they were told about a service promotion and not about porting to another service provider. It was reported that in some cases, the service provider's representative took out the customer's SIM card under the guise that the type of phone the customer had was being checked.
- 3.6.5 Given the indicated reports of fraudulent or inappropriate porting transactions, and the increasing incidents of fraud such as identity theft, experienced globally, the OUR must remain vigilant regarding the execution of the number portability process. The OUR is cognisant of the fact that fraudsters may use mobile technology to carry out scams such as SMS phishing to gain access to customers' information, which is then used for fraudulent purposes. SIM swap fraud is another common means of identity theft, and can result in the access of customers' banking accounts where they are linked to their mobile number. The OUR is mindful that with technology rapidly evolving, the use of multi-

⁶ See supra note 4

factor authentication for accounts has become more prevalent. Many financial institutions are moving to a two-factor authentication system to provide secure services to customers. There is increasing interest in stealing phone numbers because banks often send two-step verification codes over SMS. Where a SIM swap is done by a fraudster, access is gained to the authentication messages and passwords that are sent to the mobile number.

- 3.6.6 SIM swap is a legitimate service offered by the service providers, for example, to replace a damaged SIM; to facilitate a different size SIM for a new device; or as it relates to porting, to enable the customer to move to a different network. The OUR is however concerned that where the porting process is not managed properly, the customer's information can be stolen by fraudsters purporting to be a part of the legitimate number portability process. In particular, the OUR is concerned that the porting process may be more vulnerable when the porting request is initiated at locations outside of the points of sale stated in the INPG. Despite the foregoing concern, the OUR is also aware of the changes taking place in terms of how companies conduct their business, including how they market their products and reach their customers and potential customers. The Covid-19 pandemic has also played a role in transforming businesses and how customers are engaged. One example is the current physical distancing requirements in public spaces, which has resulted in a significant reduction in the number of customers permitted to enter retail and dealer stores.
- 3.6.7 The OUR in recognition of the changing market place, is amenable to expanding the types of locations at which a porting request may be initiated under the INPG. Notwithstanding, the OUR is not minded to adopt the practice of service provider's representatives being permitted to randomly approach customers and potential customers in the streets or at their homes as an acceptable mode of operation going forward. Locations that are designated as points of sale under the INPG at which the porting process may be initiated will require structure and the strict application of required protocols and procedures to minimise incidents of porting irregularities. Accordingly, it is proposed that service providers may be permitted to establish temporary stations at fixed locations from which they may conduct porting activities, in addition to their retail stores and authorised dealers. These stations may be established at:
- Community centres;
 - Public squares;
 - Entertainment and sporting events;
 - Educational centres;

- Shopping plazas; and
- Such other locations or events as the Office may approve from time to time.

3.6.8 It is the OUR's view that the porting procedures and validation requirements proposed earlier at Proposal 1 and Proposal 2, will act as consumer safeguards in the number portability process, and may mitigate the risk of fraudulent or inappropriate porting transactions. It is expected that service providers will be better able to monitor and supervise the consistent application of these procedures at fixed locations. It is therefore proposed that the term "point of sale" as used in the INPG to refer to locations at which porting transactions may be initiated should expressly include retail stores, authorised dealers and the temporary stations established at the locations mentioned in paragraph 3.6.7 above.

Impact of the Proposals on the INPG

3.6.9 To facilitate the proposals, it is suggested that a definition of 'points of sale' which includes the temporary stations established at the locations mentioned in paragraph 3.6.7, be included in the INPG. Where there are references in the INPG to "points of sale (such as a retail store or authorised dealer)", such as in paragraphs 12.1.1, 12.1.2, A.1.1, A.1.2, B.1.1 and B.1.2., these would be modified to delete the bracketed words.

3.6.10 It is proposed that a definition of "point of sale" be included in Appendix F of the INPG – Glossary of Terms and Abbreviations as follows:

<i>TERMS OR ABBREVIATIONS</i>	<i>DEFINITIONS</i>
<i>Point of sale</i>	<i>A retail store, authorised dealer store, or a temporary station that is set up by the service provider or its authorised dealer at a fixed location in a community centre, public square, entertainment or sporting event, educational centre, shopping plaza, or at such other locations or events as the Office may approve from time to time, for the purpose of executing the porting process.</i>

3.7 Proposal 7

- (a) Amend the INPG to allow the NPA to progress a porting transaction where the donor service provider fails to send the Authorisation Response within the specified timeline.**
- (b) Amend the INPG to reflect that the NPA will undertake the actions at A.8 and B.8 where the donor service provider fails to send the Instruction Response within the specified timeline, as if it was sent.**
- (c) Amend the INPG to reflect that the NPA must notify the customer where the recipient service provider does not send the Instruction Request within the specified timeline and the port is aborted.**

3.7.1 The OUR became concerned after complaints received from service providers, and data from the NPA indicated a high proportion of Port-Out Requests being timed-out due to authorization delays. The provisions of A.12 of the INPG speaks to the ordering timeframes in which the recipient service provider, the donor service provider and the NPA shall take a particular action. Failure of any of the parties to act within the timeframe set at each stage of the porting process results in the porting transaction being timed-out.

3.7.2 The OUR is mindful that there is an incentive for a donor service provider to delay its Authorization Response, given that it would be losing a customer from its network. Based on checks done by the OUR, it appeared that licensees were engaging in conduct that, without lawful justification, resulted in a significant number of timed-out ports. Where the port is aborted by the NPA after it times out, the customer is required to resubmit the porting request to facilitate the port. It is the OUR's view that if appropriate measures are not implemented to address this issue, persistent failures of this nature can negatively affect the efficiency of the porting process. Further, if left unchecked, such wilful act by licensees will serve to undermine the overall integrity of the number portability framework, frustrate the competitive process and ultimately compromise consumer welfare.

3.7.3 With the foregoing issues to be considered, the OUR convened a meeting with licensees to find workable solutions to address the matter of timed-out ports. At that meeting the OUR made proposals to reduce the impact of the donor service provider's actions on the porting process. The proposals presented by the OUR for mobile porting transactions distinguished between postpaid and prepaid transactions. This distinction was made in a

bid to facilitate the immediate adoption of an automatic authorization response for the porting of prepaid numbers, if the system was able to distinguish between prepaid and postpaid numbers. The NPA subsequently advised however that the system is unable to distinguish between prepaid and postpaid numbers. Given this information from the NPA, the recommended distinction is excluded from the proposals that are the subject of this consultation.

- 3.7.4 The proposals are intended to have the NPA override the requirement for an Authorisation Response from the donor service provider where same is not received within two (2) working days from the time the Authorisation Request was sent. In overriding this requirement from the donor service provider, the NPA would send an Authorisation Response to the recipient service provider as if the donor service provider had done the appropriate checks and raised no objection to the port.
- 3.7.5 The OUR is mindful that the proposed solution to the timed-out issue could result in the porting of numbers that would otherwise be liable for rejection of the porting request on a ground specified in Appendix C of the INPG, if the appropriate checks were completed by the donor service provider. The grounds for rejection include incorrect service type, outstanding charges and number disconnected. Notwithstanding this risk, the guidelines are very clear regarding a four (4) hour timeline within which a donor service provider should complete its porting approval checks, and submit an Authorisation Response, authorising or rejecting a porting request (see paragraphs A.3.4 and B.3.4 of the INPG). The Guidelines provide for a further two (2) working day window within which the Authorisation Response may be provided by the donor service provider before the porting transaction is aborted (see paragraphs A.3.5, A.3.6, B.3.5 and B.3.6 of the INPG). The OUR is of the view that these time frames are adequate for the completion by the donor service provider of its verification checks, and strict adherence is necessary for the efficiency of the porting process. Additionally, the failure to provide an Authorisation Response within the times specified are a breach of the guidelines (see paragraphs A.3.7 and B.3.7 of the INPG).
- 3.7.6 Further, the OUR is of the view that allowing the NPA to progress a porting transaction in the absence of an Authorisation Response within the prescribed timeline will avoid the timing out of porting requests and will add to the efficiency of the system. By so doing, consumer welfare will be maintained as it will mitigate the risk of service providers deliberately using the timing out process as a means by which it can disrupt the porting system, and frustrate the customer, such that the customer resorts to remaining on the donor's network.

- 3.7.7 Currently, where the donor service provider does not send the Instruction Response within the timeframe specified in the INPG, the NPA will carry out this and other activities relating to that action as if the donor service provider had acted accordingly. By an oversight, this action by the NPA is not reflected in the INPG, and as such, it is proposed that the necessary modification be done so that the INPG reflects the current procedures.
- 3.7.8 To be consistent with the NPA's action of notifying the customer at different stages of the porting process, it is proposed that the INPG be modified to include a notification from the NPA to be sent to the customer where the recipient service provider does not send the Instruction Request to the NPA within the specified timeframe and the port is subsequently aborted.

Impact on the Proposals on the INPG

- 3.7.9 The following modifications to provisions A.3.6, A.4.2, A.5.1, A.5.5, A.5.6, A.7.3, A.12.2, B.3.6, B.4.2, B.5.1, B.5.5, B.5.6, B.7.3, and B.12.2 of the INPG are proposed:

A.3.6 If the Authorisation Response is not sent in time, then it shall be sent as soon as possible thereafter. If the Authorisation Response has not been sent to the NPA within two (2) working days, then the NPA shall override the requirement for an Authorisation Response from the donor service provider and progress the porting transaction as if the appropriate checks were done by the donor service provider and no objection was raised to the port.

A.4.2 Where the port is approved by the donor service provider, or the NPA overrides the requirement for an Authorisation Response in accordance with sub-paragraph A.3.6, the NPA will send the Authorisation Response approving the port to the recipient service provider.

A.5.1 If the porting has been approved by the donor service provider, or the NPA overrides the requirement for an Authorisation Response in accordance with sub-paragraph A.3.6, upon receipt of the Authorisation Response from the NPA, the recipient service provider shall activate the

ported number(s) on its network, and send an Instruction Request to the donor service provider via the NPA.

A.5.5 Within two (2) hours after receiving an Authorisation Response approving the port, the recipient service provider shall activate the number on its network and send the Instruction Request to the NPA. Where such an Authorisation Response is received within the last two (2) hours of the porting window, the recipient service provider shall wait until the start of the next porting window to send the Instruction Request to the NPA.

A.5.6 If the recipient service provider is unable to send the Instruction Request within two (2) hours from the time the Authorisation Response is received, then it shall be sent as soon as possible thereafter. If the Instruction Request has not been sent to the NPA within two (2) working days, then the porting transaction shall be aborted by the NPA, and the NPA shall notify:

- i. both the recipient and donor service providers via a Timed Out Message; and*
- ii. the customer via an SMS,*

that the porting transaction has been aborted. The recipient service provider shall then deactivate the ported number.

A.7.3 The actions in sub-paragraph A.7.2 shall be completed within two (2) hours after the Instruction Request is received. If the donor service provider is unable to send the Instruction Response within the said two (2) hours then it shall be sent as soon as possible thereafter. If the Instruction Response has not been sent to the NPA within two (2) hours, then the NPA shall undertake the activities outlined in sub-paragraph A.8.1, and shall send a report to the Office and the donor service provider indicating that the Service Level Agreement (SLA) was missed.

A.12.2 Except for the Authorisation Response stage of the porting process, after two (2) working days, the NPA shall send a Timed Out message to both the recipient service provider and donor service provider, advising that the order has 'timed-out' and that the porting transaction shall be aborted.

- B.3.6 If the Authorisation Response is not sent in time, then it shall be sent as soon as possible thereafter. If the Authorisation Response has not been sent to the NPA within two (2) working days, then the NPA shall override the requirement for an Authorisation Response from the donor service provider and progress the porting transaction as if the appropriate checks were done by the donor service provider and no objection was raised to the port.*
- B.4.2 Where the port is approved by the donor service provider, or the NPA overrides the requirement for an Authorisation Response in accordance with sub-paragraph B.3.6, the NPA will send the Authorisation Response approving the port to the recipient service provider.*
- B.5.1 If the porting has been approved by the donor service provider, or the NPA overrides the requirement for an Authorisation Response in accordance with sub-paragraph B.3.6, upon receipt of the Authorisation Response from the NPA, the recipient service provider shall activate the ported number(s) on its network, and send an Instruction Request to the donor service provider via the NPA.*
- B.5.5 Within four (4) working days of receiving an Authorisation Response approving the port, the recipient service provider shall activate the number on its network and send the Instruction Request to the NPA. Where such an Authorisation Response is received within the last two (2) hours of the porting window, the recipient service provider shall wait until the start of the next porting window to send the Instruction Request to the NPA.*
- B.5.6 If the recipient service provider is unable to send the Instruction Request within four (4) working days from the time the Authorisation Response is received, then it shall be sent as soon as possible thereafter. If the Instruction Request has not been sent to the NPA within two (2) working days, then the porting transaction shall be aborted by the NPA, and the NPA shall notify:*
- i. both the recipient and donor service providers via a Timed Out Message; and*

ii. *the customer via an SMS or email,*
that the porting transaction has been aborted. The recipient service provider shall then deactivate the ported number.

B.7.3 The actions in sub-paragraph B.7.2 shall be completed within four (4) hours after the Instruction Request is received. If the donor service provider is unable to send the Instruction Response within the said four (4) hours then it shall be sent as soon as possible thereafter. If the Instruction Response has not been sent to the NPA within four (4) hours then the NPA shall undertake the activities outlined in sub-paragraph B.8.1, and shall send a report to the Office and the donor service provider indicating that the Service Level Agreement (SLA) was missed.

B.12.2 Except for the Authorisation Response stage of the porting process, after two (2) working days the NPA shall send a Timed Out message to both the recipient service provider and donor service provider, advising that the order has 'timed-out' and that the porting transaction shall be aborted.

3.8 Proposal 8

Quarterly Report Filing for Aged Numbers

- 3.8.1 The OUR is concerned that service providers are not consistently applying the provisions of the INPG as it relates to the treatment of aged numbers. The INPG specifies the aging of a number that was ported and disconnected and the return of that number to the Block Operator. The OUR notes however that there are instances in which the numbers that have aged out of the system in accordance with the Telecommunications Numbering Rules, are not returned to the Block Operator. In order to ensure monitoring and compliance with the provisions under A.17 and B.17 of the INPG, the OUR is proposing the following:
- Quarterly filings by service providers (to be submitted 6 weeks as at the end of each quarter) regarding aging of ported-in numbers.
 - The report must provide information on the status of the aging port-in numbers for the different class of service.

Impact of the proposal on the INPG

- 3.8.2 It is proposed that new provisions be included in the INPG as A.17.6 and B.17.6 which require that service providers submit quarterly filings on the status of aging port-in numbers to the OUR as follows.

A.17.6/B.17.6 Each recipient service provider shall submit to the Office within six (6) weeks of the end of a quarter, a report on the status of the aging of ported-in numbers for the different class of service for that quarter. The report should include:

- i. A description of each number - i.e. the number being aged, the class of service, and its status in the aging process (e.g. one month out of 3, etc.,)*
- ii. The numbers returned to the Block Operator during the quarter.*

Chapter 4: **Proposals for Modification of the General Sections of the INPG**

In addition to the modifications to specific sections of the INPG to address the proposals that have been included in the previous section of this Consultation Document, a general review of the INPG was deemed necessary to identify and update the provisions, so that obsolete clauses are removed, aspects of the porting process that are currently in operation are adequately reflected in the INPG and, where reflected in the INPG but not adequately operationalized, that this is done. Additionally, changes are proposed to ensure that sections, such as the definition section, are comprehensive.

- 4.1.1 The proposed modifications and or deletions are detailed below.

Paragraph 1 – Introduction

- 4.1.2 It is proposed that paragraph 1 should be updated to reflect the status of the revised INPG when finalised and amended by the OUR, should remove references and obligations of the Number Portability Working Group which is now obsolete, and should solely reference the OUR's power to amend the INPG as provided for in the Rules.
- 4.1.3 A proposed redraft of the paragraph is as follows:

- 1.1 Industry Number Portability Guidelines ("INPG") were developed and agreed in 2015 June in accordance with rules 43 and 46 of the Telecommunications (Number Portability) Rules, 2014 ("the Rules") by the Number Portability Working Group ("NPWG") established under the Rules. The INPG prescribes procedures to manage the processes for porting telephone number(s) between public telecommunications carriers ("PTC"). The NPWG has now ceased to exist pursuant to rule 43(2) of the Rules.*
- 1.2 This document sets out the INPG as amended by the Office of Utilities Regulation ("the Office") in accordance with rule 47 of the Rules.*
- 1.3 These INPG may be amended, from time to time, by the Office, in keeping with the Telecommunications Act ("the Act").*

Paragraph 3 – Principles

- 4.1.4 In light of the modifications proposed to paragraph 1 - Introduction, it is further proposed that the change control procedures set out in paragraph 3 be deleted in their entirety. This would result in the paragraph addressing only the effective date and applicable law of the INPG.
- 4.1.5 A proposed redraft of paragraph 3 is as follows:

3. PRINCIPLES

3.1 Effective Date

3.1.1 These INPG shall come into force on XXXXX.

3.2 Applicable Law

3.2.1 In the event of any conflict or inconsistency between the INPG and Rules, the Act or any other applicable laws of Jamaica, the Rules, the Act and the other applicable laws of Jamaica shall prevail.

Paragraph 5 – Technical and Operational Principles of Number Portability

- 4.1.6 It is proposed that sub-paragraphs 5.1.9 to 5.1.13 be modified to reflect obligations of the NPA, sharing of information with the Office and NPA, as appropriate, regarding contact details of responsible departments and officers in the porting process, and the provision of advisories concerning planned and unplanned system disruptions.
- 4.1.7 Proposed redrafts of these provisions are as follows:

5.1.9 PTCs, service providers and the NPA shall share with each other and advise the Office of the following:

- a. contact details of the sections or departments within their respective organisations which deal with the day-to-day operation of number portability and with number portability escalations; and*
- b. emergency contact details, which apply outside of normal work hours.*

To avoid misunderstanding, contacts should refer to responsibilities and/or positions rather than named individuals, that is, 'The Help Desk Manager'

rather than 'Mrs. Joan Smith'. The Contact Information template included in Appendix G may be used as a guide.

5.1.10 PTCs, service providers and the NPA agree to manage and monitor the porting process to:

- a. the general benefit of customers; and*
- b. ensure that any recognised weak points or common areas of failure in the service are identified and, where practical, eliminated.*

5.1.11 PTCs, service providers and the NPA will, at all times and in good faith, cooperate to ensure that disruptions in service are minimised.

5.1.12 PTCs, service providers and the NPA will, at all times and in good faith, ensure that:

- a. planned changes to their own networks or systems are communicated to other PTCs and service providers, the NPA and the Office, where some disruption to the porting process is unavoidable or envisaged.*
- b. unplanned changes to their own networks or systems are communicated to other PTCs and service providers, the NPA and the Office, as soon as practicable, and completed in such a way as to minimise disruption to the porting process.*

5.1.13 Where appropriate, PTCs, service providers and the NPA will cooperate to manage the normal operational functionality of the porting process where a planned change to the network/system of an individual PTC, service provider or NPA is likely to cause disruption to the porting process.

Paragraph 20 – Planned and Unplanned Outages

4.1.8 It is proposed that paragraph 20 be modified to provide for notifications to the OUR regarding unplanned outages and the conclusion of outages, and include the timeframe within which the Office and the NPA should be notified of planned outages.

4.1.9 Proposed modifications of sub-paragraphs 20.3, 20.4 (a) and 20.6 are as follows:

20.3 PTCs and service providers must provide details of all planned outages to the NPA and the Office at least five (5) working days before the outage occurs. Changes to the planned outage date or time shall be communicated to the NPA and the Office via telephone and email as soon as possible.

20.4 In the event that a PTC or service provider identifies that it is experiencing an unplanned outage, it must as soon as practicable:

(a) notify all parties involved in the porting process and the Office via telephone and email. Where notification by email fails, then the notification shall be provided by facsimile; and

20.6 The PTC or service provider that experienced the system outage shall, as soon as practicable, give notice of the conclusion of the outage to all parties involved in the porting process and the Office via telephone and email. Where notification by email fails, then the notification shall be provided by facsimile.

Appendix C – Response Code List

4.1.10 Rule 24(a) states that a number to be ported may be denied where “there are inconsistencies between the mandatory porting data, as defined in the industry number probability guidelines under rule 46, and the customer information that has already been collected or held by the donor service provider.” In accordance with this rule, the INPG specifies at A.1.7 and B.1.7, a set of mandatory porting data that should be included in the Authorisation Request that the recipient service provider sends to the NPA, as follows:

- (a) Telephone number
- (b) Name of customer
- (c) Name of donor service provider
- (d) Type of service (pre-paid, post-paid, Close User Group)

The INPG also specifies at A.13.1 and B.13.1 that a donor service provider can reject an Authorisation Response for the rejection reason(s) specified in Appendix C of the INPG. In reviewing the existing response codes the OUR noted that they would not adequately reflect the requirements for all mandatory porting data. See table below:

Response Code*	Description
00	Ok / Approved
01	Service type not correct
02	Outstanding charges
03	Number disconnected
04	Outstanding charges - Roaming

- 4.1.11 The OUR, during a subsequent discussion with the NPA on this matter, was made aware by the NPA that a porting request cannot be created on its order handling system without a telephone number, and that the system automatically determines the donor service provider. The NPA also informed the OUR that the system is not currently configured to make the name of the customer a mandatory entry on the Authorisation Request. The NPA informed however, that it can implement changes to its system to ensure that all the mandatory porting data is a required entry in the order handling system, and made visible to the donor service provider. The NPA further informed that this can be done without a cost being passed on to the service providers. In relation to the service providers, where their systems are not currently configured to include all the mandatory porting data, adjustments will be required. The OUR is currently unaware of any cost implication to the service providers to make this change where necessary. With the foregoing in mind, and to ensure that the number portability process is being conducted in accordance with the stipulation of the rules and the INPG, the OUR is proposing to correct this oversight as a part of the consultation process.
- 4.1.12 A modification will be made to Appendix C in the INPG to include a response code as follows:

Response Code	Description
05	Customer name does not match

Appendix F – Glossary of Terms and Abbreviations

- 4.1.13 The Glossary provides an easy reference point to verify the meaning of terms and abbreviations used throughout the INPG. It is proposed that a few additional defined terms used in the INPG that have not been included in the Glossary be added as follows:

<i>TERMS OR ABBREVIATIONS</i>	<i>DEFINITIONS</i>
<i>Act</i>	<i>The Telecommunications Act as may be amended or replaced from time to time</i>
<i>Guidelines</i>	<i>The Industry Number Portability Guidelines developed pursuant to the Rules.</i>
<i>ID</i>	<i>Identification Card</i>
<i>INPG</i>	<i>The Industry Number Portability Guidelines developed pursuant to the Rules.</i>
<i>Office</i>	<i>The Office of Utilities Regulation.</i>
<i>Porting Records</i>	<i>The Porting Request Form, Porting Register, supporting documents submitted with a porting request (including proof of identity of the person requesting a port and the person submitting the request where the individuals are different, and the documents outlined in sub-paragraphs A.14.2 and B.14.2), and correspondence between the customer and service provider and between the recipient service provider and donor service provider, that are associated with a porting request.</i>
<i>Porting Register</i>	<i>A paper-based register kept by the recipient service provider upon which the customer's name, customer's signature date, telephone number, and service provider representative's name will be recorded in respect of porting requests made using an electronic Porting Request Form.</i>
<i>PTC</i>	<i>Public telecommunications carriers.</i>

<i>Rules</i>	<i>The Telecommunications (Number Portability) Rules, 2014 issued pursuant to the Act, and as may be modified or replaced from time to time.</i>
<i>Service Provider</i>	<i>Shall have the meaning as ascribed in the Telecommunications Act.</i>

Appendix G – NP Contact Information

4.1.14 It is noted that some of the contact information included in Appendix G of the INPG is outdated as organisation structures and responsible officers in the organizations have changed. It is also anticipated that during the life of the INPG this information will change from time to time. It is therefore proposed that the details of the contact information for officers involved in the porting process not be included as a schedule to the INPG. Instead it is recommended that this schedule reflect a template for the presentation of that information as should be shared and notified pursuant to paragraph 5.1.9 of the INPG.

4.1.15 The proposed modification to Appendix G is as follows:

APPENDIX G – TEMPLATE FOR NUMBER PORTABILITY CONTACT INFORMATION

Name of Organization:

<i>FUNCTIONAL AREA</i>	<i>POSITION</i>	<i>CONTACT NUMBER</i>	<i>EMAIL</i>
<i>Help Desk/Customer service</i>			
<i>Porting Provisioning</i>			
<i>IT Systems/Technical Support</i>			
<i>Network(s)/Core Network Routing</i>			
<i>Escalation for Network</i>			
<i>Emergency Contact</i>			
<i>Sponsor</i>			

Chapter 5: Proposed Modifications to the INPG

5.1 Modifications based on Proposals

Proposal 1

- (e) Amend the INPG to make it clear that the Porting Request Form must include:**
 - the name and signature of the service provider's representative undertaking the validation process
 - the specific location at which the porting process was initiated
- (f) Amend the INPG to specify that the recipient service provider shall verify that the signature on the identification provided by the person requesting the port matches the signature provided on the Porting Request Form.**
- (g) Amend the INPG to require the inclusion of a set of mandatory information that must be included on the Porting Request Form.**
- (h) Amend the INPG to increase the time period for retention of customer porting transaction details.**

The following modifications are proposed to the INPG to capture Proposal 1:

Modify section 12.1.5 and insert a new 12.1.6 and 12.1.7 as follows:

12.1.5 The customer signs the Porting Request Form, the form of which can be found in Appendix H. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification.

12.1.6 The representative of the recipient service provider executing the validation of the request to port completes the confirmations on the Porting Request Form, prints his/her name on the Porting Request Form and signs and dates the form.

12.1.7 The mandatory information indicated on the Porting Request Form must be completed by the customer and the representative of the recipient service provider as applicable.

The appropriate renumbering of the unmodified paragraphs of section 12 (that is the current 12.1.6 to 12.1.18) would be done to accommodate the inclusion of the proposed new clauses.

Modify paragraph 13.2 to amend sub-paragraphs i. and ii. and add two additional provisions, as sub-paragraphs iii. and iv. as follows:

13.2 The recipient service provider shall undertake the following validation steps:

- i. Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary;*
- ii. Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records for*

a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.

- iii. Ensure that the representative of the recipient service provider that is executing the validation of the request to port prints his/her name on the Porting Request Form, confirms on the form that the steps at 12.1.3 and 12.1.4 were undertaken, and signs and dates the form.*
- iv. Ensure that the location of the point of sale where the porting request was initiated is recorded on the Porting Request Form.*

A.1.4 The recipient service provider shall satisfy itself that the customer requesting the port of a number is authorized to do so. The recipient service provider will undertake the following validation steps:

- i. Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary;*
- ii. Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records for a period of at least*

twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.

- iii. Ensure that the representative of the recipient service provider that is executing the validation of the request to port prints his/her name on the Porting Request Form, confirms on the form that the steps at 12.1.3 and 12.1.4 were undertaken, and signs and dates the form.*
- iv. Ensure that the location of the point of sale where the porting request was initiated is recorded on the Porting Request Form.*

A.14.4 The recipient service provider shall:

...

- iv. ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. The Porting Request Form is also the legal instrument appointing the recipient service provider as its agent to port its number from the donor service provider and close its account if necessary;*
- v. Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.*

...

- vii *Ensure the representative of the recipient service provider that is executing the validation of the request to port prints his/her name on the Porting Request Form, confirms on the form that the steps at 12.1.3 and 12.1.4 were undertaken, and signs and dates the form.*
- viii *Except where the porting request is initiated electronically, ensure that the location of the point of sale where the porting request was initiated is recorded on the Porting Request Form.*

B.1.4 The recipient service provider shall satisfy itself that the customer requesting the port of a number is authorized to do so. The recipient service provider will undertake the following validation steps:

- i. *Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary;*
- ii. *Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.*

- iii. *Ensure that the representative of the recipient service provider that is executing the validation of the request to port prints his/her name on the Porting Request Form, confirms on the form that the steps at 12.1.3 and 12.1.4 were undertaken, and signs and dates the form.*
- iv. *Ensure that the location of the point of sale where the porting request was initiated is recorded on the Porting Request Form.*

B.14.4 The recipient service provider shall:

...

- iv. *Ensure that the customer completes and signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. The Porting Request Form is also the legal instrument appointing the recipient service provider as its agent to port its number from the donor service provider and close its account if necessary;*
- v. *Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.*

...

- vii *Ensure the representative of the recipient service provider that is executing the validation of the request to port prints his/her name*

on the Porting Request Form, confirms on the form that the steps at 12.1.3 and 12.1.4 were undertaken, and signs and dates the form.

- viii *Except where the porting request is initiated electronically, ensure that the location of the point of sale where the porting request was initiated is recorded on the Porting Request Form.*

Note that it is proposed that the provisions of A.14.4 and B.14.4 not mentioned above would remain as in the current INPG unmodified.

Proposal 2

Amend the INPG to make it clear that the Porting Request Form may either be hard copy or represented as a soft copy on an electronic device.

The following modifications are proposed to capture Proposal 2

It is proposed that further modifications be made to sub-paragraphs 12.1.5, 13.2(i), A.1.4(i), A.14.4(iv), B.1.4(i) and B.14.4(iv) as follows:

12.1.5

- i. *A paper-based or electronic Porting Request Form shall be completed, the form of which can be found in Appendix H.*
- ii. *In the case of a paper-based Porting Request Form, the customer signs the Porting Request Form. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification.*
- iii. *In the case of an electronic Porting Request Form, the customer signs the Porting Request Form as well as a paper-based register upon which the customer's name, date, telephone number, and service provider representative's name will be recorded (the Porting Register). Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark on the Porting Register, and shall include a notation on the Porting Request Form detailing the*

disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification.

- 13.2(i) *Ensure that the customer signs the Porting Request Form indicating an intent to port. In the case of an electronic Porting Request Form the customer shall also sign a paper-based register upon which the customer's name, date, telephone number, and service provider representative's name will be recorded. The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary;*

A.1.4

- i. *Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. In the case of an electronic Porting Request Form the customer shall also sign a paper-based register upon which the customer's name, date, telephone number, and service provider representative's name will be recorded (the Porting Register). The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary.*
- ii. *Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form or the Porting Register is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records and the Porting Register for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.*

A.14.4

...

- iv. *Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. In the case of an electronic Porting Request Form the customer shall also sign a paper-based register upon which the customer's name, date, telephone number, and service provider representative's name will be recorded (the Porting Register). The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary.*
- v. *Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form or the Porting Register is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records and the Porting Register for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.*

...

B.1.4

- i. *Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. In the case of an electronic Porting Request Form the customer shall also sign a paper-based register upon which the customer's name, date, telephone number, and service provider representative's name will be recorded (the Porting Register). The Porting Request Form is also the legal instrument appointing the recipient*

service provider as his agent to port his number from the donor service provider and close his account if necessary.

- ii. *Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form or the Porting Register is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records and the Porting Register for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.*

B.14.4

...

- iv. *Ensure that the customer signs the Porting Request Form, the form of which can be found in Appendix H, indicating an intent to port. In the case of an electronic Porting Request Form the customer shall also sign a paper-based register upon which the customer's name, date, telephone number, and service provider representative's name will be recorded (the Porting Register). The Porting Request Form is also the legal instrument appointing the recipient service provider as his agent to port his number from the donor service provider and close his account if necessary.*
- v. *Record a valid and unexpired proof of identity of the person requesting a port and the person submitting the request (where the persons are different). The recipient service provider shall ensure that the likeness on the identification resembles the person requesting or submitting the request to port, as the case may be, and that the signature provided on the Porting Request Form or the Porting Register is similar to the signature on the identification submitted at the time the porting request is initiated. Where the customer is unable to sign due to physical or other impairment, the representative of the recipient service*

provider shall permit the customer to make a mark, shall witness the mark, and shall include a notation on the Porting Request Form detailing the disability or impairment that prevented the customer from providing a signature that is similar to that on the supporting identification. The recipient service provider is required to retain the Porting Records and the Porting Register for a period of at least twenty-four (24) months. Proof of identity includes national identification card, passport, driver's licence, work or school ID.

Proposal 3

Amend the INPG to include the requirement of proof of address as part of the validation.

Based on the OUR's assessment of this proposal in chapter 3, the view was taken that it did not improve the validation process and would rather disenfranchise some of the customer base, who given their demography, social and or economic profiles, would be unable to provide proof of address. The proposal was therefore rejected.

Proposal 4

Amendment of the INPG to outline a Transparent Repatriation Process

The proposed modifications to section 18 of the INPG are detailed below.

It is proposed that sub-paragraph 18.1 be modified to include the requirement for the number to be repatriated promptly and in a manner as if the number had not been ported as follows:

18.1 Repatriation comprises the return of a customer's ported number to the donor service provider, and in a manner to ensure the restoration of all routing as if the number had not been ported. Repatriation is not time-bound and can be invoked at any time by a customer who is able to demonstrate that the ported number is assigned to him and has been ported without his consent. Repatriation must be done promptly and in accordance with the provisions of this paragraph 18.

It is proposed that sub-paragraph 18.2 be modified to include the timelines within which the donor service provider should act once a complaint of fraudulent/inappropriate porting is received as follows:

18.2 The donor service provider shall request the recipient service provider to provide copies of the Porting Request Form and associated identification documentation used to initiate the particular porting transaction within one (1) working day of receipt of the complaint of a fraudulent or inappropriate porting transaction.

It is proposed that a new provision be included as paragraph 18.3 which indicates the timeline within which the recipient service provider must respond to the donor service provider's request as follows:

18.3 The recipient service provider shall provide the information requested by the donor service provider within one (1) working day of receipt of the request.

It is proposed that the existing paragraph 18.3 be renumbered as 18.4, and modified to reflect the timeline within which both the donor and recipient service provider shall complete their investigation into a complaint of a fraudulent or inappropriate porting transaction as follows:

18.4 The donor service provider and the recipient service provider shall work in good faith to complete the investigation into reported incidents of fraudulent or inappropriate porting transactions within three (3) working days of having received the requested information (in the case of the donor service provider) or having provided the requested information (in the case of the recipient service provider), and promptly report their findings to the NPA.

It is proposed that a new provision be included as paragraph 18.5 outlining the circumstances under which a porting transaction may be considered to be fraudulent or inappropriate.

18.5 The following circumstances may constitute fraudulent or inappropriate porting:

- *Inconsistency between the mandatory porting data outlined in A.1.7 and B.1.7 included on the Porting Request Form and the customer information held by the donor service provider.*
- *A Porting Request Form that is not signed by both the customer and the service provider representative.*
- *The name on the customer identification submitted at the time of the initiation of the porting process does not match the information on the Porting Request Form.*
- *The signature on the customer identification submitted at the time of the initiation of the porting process is different from that of the customer on the Porting Request Form or Porting Register, except where the customer makes a mark in the circumstances specified in sub-paragraph 13.2 ii.*
- *There is no record of a valid, acceptable and unexpired proof of identity of the person requesting the port and the person submitting the request where necessary, and*
- *Any other circumstances in which the customer can demonstrate that the number was ported without his/her consent.*

It is proposed that the automated repatriation process set out in Appendix 2 of this document be included as a new Appendix J in the INPG. Additionally, the existing sub-paragraphs at 18.4 and 18.5 may be consolidated, renumbered as 18.6 and modified to include the timeline within which the repatriation must be completed using the automated repatriation process in Appendix J. The modified sub-paragraph may be as follows:

18.6 Where porting transactions are subsequently determined to be fraudulent or inappropriate, the numbers involved shall be repatriated promptly, to the donor service provider within 24 hours of the said determination using the automated repatriation process outlined in Appendix J.

It is proposed that the existing provision at sub-paragraph 18.6 be deleted as it is no longer necessary given the new repatriation process in Appendix 2 of this document that is being proposed for inclusion in the INPG.

It is proposed that the existing provision at sub-paragraph 18.7 be modified to reflect that the matter must be referred to the OUR where the donor service provider and the recipient service provider cannot reach agreement as to the status of the porting

transaction, that is whether or not it is fraudulent or inappropriate. The proposed amendment is as follows:

18.7 Where the donor service provider and the recipient service provider cannot reach agreement as to the status of the porting transaction, that is whether or not it is fraudulent or inappropriate, within five (5) working days of receipt of the customer's complaint, either party may refer the dispute to the Office for a resolution. If the Office determines that the porting transaction was fraudulent or inappropriate, the automated repatriation process set out in Appendix J shall be applied.

It is proposed that a new provision be included as sub-paragraph 18.8 which outlines what the OUR will require where the service providers cannot reach an agreement in their investigation of a complaint regarding an alleged fraudulent or inappropriate porting transaction, and the matter is referred to the OUR for a resolution. The proposed new provision is as follows:

18.8 Where the dispute referenced at sub-paragraph 18.7 above is referred to the Office for resolution, the following shall be provided to the Office along with the referral:

- Copies of all documents that were required for the initiation of the porting request (where available in the case of a referral from the donor service provider).*
- Copies of all correspondence, where available, between the customer and the service provider regarding the complaint, and any documents submitted.*
- Copies of correspondences between the donor service provider and recipient service provider regarding the complaint and its investigation.*
- Copies of the results of the investigations carried out by the service providers into the complaint.*
- Any other information as may be requested by the Office from time to time.*

As the existing and proposed procedures and timelines for customer complaint handling and disputes between the service providers in respect of allegations of fraudulent or inappropriate porting differ from those specified in the provisions which generally

address the management of customer complaints and dispute resolution, it is proposed that the general provisions be modified to expressly exclude complaints and disputes relating fraudulent or inappropriate porting, and instead reference the procedures in this regard as set out in paragraph 18 of the INPG.

It is therefore proposed that new clauses be included in paragraphs 8 and 9 of the INPG as follows:

- 8.7 *Notwithstanding the foregoing provisions, customer complaints relating to alleged fraudulent or inappropriate porting shall be subject to the procedures set out in paragraph 18.*
- 9.3 *Notwithstanding the foregoing provisions, disputes between service providers concerning complaints or investigations of fraudulent or inappropriate porting shall be addressed in accordance with the provisions in paragraph 18.*

Proposal 5

Amend the INPG to reflect an automated repatriation process.

Impact of the proposal on the INPG

The modifications proposed earlier to be made to the consolidated provision (18.4 and 18.5) at sub-paragraph 18.6 adequately address this proposal, as they speak to the number being repatriated in accordance with the automated repatriation process outlined in the proposed new Appendix J of the INP.

- 18.7 *Where it is determined that a porting transaction is fraudulent or inappropriate the number(s) shall be returned to the donor service provider using the emergency repatriation process outlined in Appendix J.*

Proposal 6

- (a) Permit a porting request to be initiated at additional locations designated by the service provider that is outside of the prescribed points of sale.
- (b) Amend the INPG to remove any ambiguity regarding the definition of a point of sale.

Impact of the Proposals on the INPG

To facilitate the proposals, it is suggested that a definition of ‘points of sale’ which includes the temporary stations established at the locations mentioned in paragraph 3.6.7, be included in the INPG. Where there are references in the INPG to “points of sale (such as a retail store or authorised dealer)”, such as in paragraphs 12.1.1, 12.1.2, A.1.1, A.1.2, B.1.1 and B.1.2., these would be modified to delete the bracketed words.

It is proposed that a definition of “point of sale” be included in Appendix F of the INPG – Glossary of Terms and Abbreviations as follows:

<i>TERMS OR ABBREVIATIONS</i>	<i>DEFINITIONS</i>
<i>Point of sale</i>	<i>A retail store, authorised dealer store, or a temporary station that is set up by the service provider or its authorised dealer at a fixed location in a community centre, public square, entertainment or sporting event, educational centre, shopping plaza, or at such other locations or events as the Office may approve from time to time, for the purpose of executing the porting process.</i>

Proposal 7

- (a) Amend the INPG to allow the NPA to progress a porting transaction where the donor service provider fails to send the Authorisation Response within the specified timeline.
- (b) Amend the INPG to reflect that the NPA will undertake the actions at A.8 and B.8 where the donor service provider fails to send the Instruction Response within the specified timeline, as if it was sent.

- (c) **Amend the INPG to reflect that the NPA must notify the customer where the recipient service provider does not send the Instruction Request within the specified timeline and the port is aborted.**

Impact on the Proposals on the INPG

The following modifications to provisions A.3.6, A.4.2, A.5.1, A.5.5, A.5.6, A.7.3, A.12.2, B.3.6, B.4.2, B.5.1, B.5.5, B.5.6, B.7.3, and B.12.2 of the INPG are proposed:

- A.3.6 If the Authorisation Response is not sent in time, then it shall be sent as soon as possible thereafter. If the Authorisation Response has not been sent to the NPA within two (2) working days, then the NPA shall override the requirement for an Authorisation Response from the donor service provider and progress the porting transaction as if the appropriate checks were done by the donor service provider and no objection was raised to the port.*
- A.4.2 Where the port is approved by the donor service provider, or the NPA overrides the requirement for an Authorisation Response in accordance with sub-paragraph A.3.6, the NPA will send the Authorisation Response approving the port to the recipient service provider.*
- A.5.1 If the porting has been approved by the donor service provider, or the NPA overrides the requirement for an Authorisation Response in accordance with sub-paragraph A.3.6, upon receipt of the Authorisation Response from the NPA, the recipient service provider shall activate the ported number(s) on its network, and send an Instruction Request to the donor service provider via the NPA.*
- A.5.5 Within two (2) hours after receiving an Authorisation Response approving the port, the recipient service provider shall activate the number on its network and send the Instruction Request to the NPA. Where such an Authorisation Response is received within the last two (2) hours of the porting window, the recipient service provider shall wait until the start of the next porting window to send the Instruction Request to the NPA.*

A.5.6 If the recipient service provider is unable to send the Instruction Request within two (2) hours from the time the Authorisation Response is received, then it shall be sent as soon as possible thereafter. If the Instruction Request has not been sent to the NPA within two (2) working days, then the porting transaction shall be aborted by the NPA, and the NPA shall notify:

iii. both the recipient and donor service providers via a Timed Out Message; and

iv. the customer via an SMS,

that the porting transaction has been aborted. The recipient service provider shall then deactivate the ported number.

A.7.3 The actions in sub-paragraph A.7.2 shall be completed within two (2) hours after the Instruction Request is received. If the donor service provider is unable to send the Instruction Response within the said two (2) hours then it shall be sent as soon as possible thereafter. If the Instruction Response has not been sent to the NPA within two (2) hours, then the NPA shall undertake the activities outlined in sub-paragraph A.8.1, and shall send a report to the Office and the donor service provider indicating that the Service Level Agreement (SLA) was missed.

A.12.2 Except for the Authorisation Response stage of the porting process, after two (2) working days, the NPA shall send a Timed Out message to both the recipient service provider and donor service provider, advising that the order has ‘timed-out’ and that the porting transaction shall be aborted.

B.3.6 If the Authorisation Response is not sent in time, then it shall be sent as soon as possible thereafter. If the Authorisation Response has not been sent to the NPA within two (2) working days, then the NPA shall override the requirement for an Authorisation Response from the donor service provider and progress the porting transaction as if the appropriate checks were done by the donor service provider and no objection was raised to the port.

- B.4.2 Where the port is approved by the donor service provider, or the NPA overrides the requirement for an Authorisation Response in accordance with sub-paragraph B.3.6, the NPA will send the Authorisation Response approving the port to the recipient service provider.*
- B.5.1 If the porting has been approved by the donor service provider, or the NPA overrides the requirement for an Authorisation Response in accordance with sub-paragraph B.3.6, upon receipt of the Authorisation Response from the NPA, the recipient service provider shall activate the ported number(s) on its network, and send an Instruction Request to the donor service provider via the NPA.*
- B.5.5 Within four (4) working days of receiving an Authorisation Response approving the port, the recipient service provider shall activate the number on its network and send the Instruction Request to the NPA. Where such an Authorisation Response is received within the last two (2) hours of the porting window, the recipient service provider shall wait until the start of the next porting window to send the Instruction Request to the NPA.*
- B.5.6 If the recipient service provider is unable to send the Instruction Request within four (4) working days from the time the Authorisation Response is received, then it shall be sent as soon as possible thereafter. If the Instruction Request has not been sent to the NPA within two (2) working days, then the porting transaction shall be aborted by the NPA, and the NPA shall notify:*
- iii. both the recipient and donor service providers via a Timed Out Message; and*
 - iv. the customer via an SMS or email,*
- that the porting transaction has been aborted. The recipient service provider shall then deactivate the ported number.*
- B.7.3 The actions in sub-paragraph B.7.2 shall be completed within four (4) hours after the Instruction Request is received. If the donor service provider is unable to send the Instruction Response within the said four (4) hours then it shall be sent as soon as possible thereafter. If the Instruction Response has not been sent to the NPA within four (4) hours*

then the NPA shall undertake the activities outlined in sub-paragraph B.8.1, and shall send a report to the Office and the donor service provider indicating that the Service Level Agreement (SLA) was missed.

B.12.2 Except for the Authorisation Response stage of the porting process, after two (2) working days the NPA shall send a Timed Out message to both the recipient service provider and donor service provider, advising that the order has 'timed-out' and that the porting transaction shall be aborted.

Proposal 8

Quarterly Report Filing for Aged Numbers

Impact of the proposal on the INPG

It is proposed that new provisions be included in the INPG as A.17.6 and B.17.6 which require that service providers submit quarterly filings on the status of aging port-in numbers to the OUR as follows.

A.17.6/B.17.6 Each recipient service provider shall submit to the Office within six (6) weeks of the end of a quarter, a report on the status of the aging of ported-in numbers for the different class of service for that quarter. The report should include:

- iii. A description of each number - i.e. the number being aged, the class of service, and its status in the aging process (e.g. one month out of 3, etc.,)*
- iv. The numbers returned to the Block Operator during the quarter.*

5.2 Proposed Modifications of the General Sections of the INPG

Paragraph 1 – Introduction

It is proposed that paragraph 1 should be updated to reflect the status of the revised INPG when finalised and amended by the OUR, should remove references and obligations of

the Number Portability Working Group which is now obsolete, and should solely reference the OUR's power to amend the INPG as provided for in the Rules.

A proposed redraft of the paragraph is as follows:

- 1.4 Industry Number Portability Guidelines ("INPG") were developed and agreed in 2015 June in accordance with rules 43 and 46 of the Telecommunications (Number Portability) Rules, 2014 ("the Rules") by the Number Portability Working Group ("NPWG") established under the Rules. The INPG prescribes procedures to manage the processes for porting telephone number(s) between public telecommunications carriers ("PTC"). The NPWG has now ceased to exist pursuant to rule 43(2) of the Rules.*
- 1.5 This document sets out the INPG as amended by the Office of Utilities Regulation ("the Office") in accordance with rule 47 of the Rules.*
- 1.6 These INPG may be amended, from time to time, by the Office, in keeping with the Telecommunications Act ("the Act").*

Paragraph 3 – Principles

In light of the modifications proposed to paragraph 1 - Introduction, it is further proposed that the change control procedures set out in paragraph 3 be deleted in their entirety. This would result in the paragraph addressing only the effective date and applicable law of the INPG.

A proposed redraft of paragraph 3 is as follows:

3. PRINCIPLES

3.1 Effective Date

3.1.1 These INPG shall come into force on XXXXX.

3.2 Applicable Law

3.2.1 In the event of any conflict or inconsistency between the INPG and Rules, the Act or any other applicable laws of Jamaica, the Rules, the Act and the other applicable laws of Jamaica shall prevail.

Paragraph 5 – Technical and Operational Principles of Number Portability

It is proposed that sub-paragraphs 5.1.9 to 5.1.13 be modified to reflect obligations of the NPA, sharing of information with the Office and NPA, as appropriate, regarding contact details of responsible departments and officers in the porting process, and the provision of advisories concerning planned and unplanned system disruptions.

Proposed redrafts of these provisions are as follows:

5.1.9 PTCs, service providers and the NPA shall share with each other and advise the Office of the following:

- a. contact details of the sections or departments within their respective organisations which deal with the day-to-day operation of number portability and with number portability escalations; and*
- b. emergency contact details, which apply outside of normal work hours.*

To avoid misunderstanding, contacts should refer to responsibilities and/or positions rather than named individuals, that is, 'The Help Desk Manager' rather than 'Mrs. Joan Smith'. The Contact Information template included in Appendix G may be used as a guide.

5.1.10 PTCs, service providers and the NPA agree to manage and monitor the porting process to:

- a. the general benefit of customers; and*
- b. ensure that any recognised weak points or common areas of failure in the service are identified and, where practical, eliminated.*

5.1.11 PTCs, service providers and the NPA will, at all times and in good faith, cooperate to ensure that disruptions in service are minimised.

5.1.12 PTCs, service providers and the NPA will, at all times and in good faith, ensure that:

- a. *planned changes to their own networks or systems are communicated to other PTCs and service providers, the NPA and the Office, where some disruption to the porting process is unavoidable or envisaged.*
- b. *unplanned changes to their own networks or systems are communicated to other PTCs and service providers, the NPA and the Office, as soon as practicable, and completed in such a way as to minimise disruption to the porting process.*

5.1.13 *Where appropriate, PTCs, service providers and the NPA will cooperate to manage the normal operational functionality of the porting process where a planned change to the network/system of an individual PTC, service provider or NPA is likely to cause disruption to the porting process.*

Paragraph 20 – Planned and Unplanned Outages

It is proposed that paragraph 20 be modified to provide for notifications to the OUR regarding unplanned outages and the conclusion of outages, and include the timeframe within which the Office and the NPA should be notified of planned outages.

Proposed modifications of sub-paragraphs 20.3, 20.4 (a) and 20.6 are as follows:

- 20.3 *PTCs and service providers must provide details of all planned outages to the NPA and the Office at least five (5) working days before the outage occurs. Changes to the planned outage date or time shall be communicated to the NPA and the Office via telephone and email as soon as possible.*
- 20.4 *In the event that a PTC or service provider identifies that it is experiencing an unplanned outage, it must as soon as practicable:*
 - (a) *notify all parties involved in the porting process and the Office via telephone and email. Where notification by email fails, then the notification shall be provided by facsimile; and*
- 20.6 *The PTC or service provider that experienced the system outage shall, as soon as practicable, give notice of the conclusion of the outage to all parties involved in the porting process and the Office via telephone and email.*

Where notification by email fails, then the notification shall be provided by facsimile.

Appendix C – Response Code List

In reviewing the existing response codes the OUR noted that they would not adequately reflect the requirements for all mandatory porting data. A modification will be made to Appendix C in the INPG to include a response code as follows:

Response Code	Description
05	Customer name does not match

Appendix F – Glossary of Terms and Abbreviations

The Glossary provides an easy reference point to verify the meaning of terms and abbreviations used throughout the INPG. It is proposed that a few additional defined terms used in the INPG that have not been included in the Glossary be added as follows:

<i>TERMS OR ABBREVIATIONS</i>	<i>DEFINITIONS</i>
<i>Act</i>	<i>The Telecommunications Act as may be amended or replaced from time to time</i>
<i>Guidelines</i>	<i>The Industry Number Portability Guidelines developed pursuant to the Rules.</i>
<i>ID</i>	<i>Identification Card</i>
<i>INPG</i>	<i>The Industry Number Portability Guidelines developed pursuant to the Rules.</i>
<i>Office</i>	<i>The Office of Utilities Regulation.</i>
<i>Porting Records</i>	<i>The Porting Request Form, Porting Register, supporting documents submitted with a porting request (including proof of identity of the person requesting a port and the person submitting the request where the individuals are different, and</i>

	<i>the documents outlined in subparagraphs A.14.2 and B.14.2), and correspondence between the customer and service provider and between the recipient service provider and donor service provider, that are associated with a porting request.</i>
<i>Porting Register</i>	<i>A paper-based register kept by the recipient service provider upon which the customer's name, customer's signature date, telephone number, and service provider representative's name will be recorded in respect of porting requests made using an electronic Porting Request Form.</i>
<i>PTC</i>	<i>Public telecommunications carriers.</i>
<i>Rules</i>	<i>The Telecommunications (Number Portability) Rules, 2014 issued pursuant to the Act, and as may be modified or replaced from time to time.</i>
<i>Service Provider</i>	<i>Shall have the meaning as ascribed in the Telecommunications Act.</i>

Appendix G – NP Contact Information

It is noted that some of the contact information included in Appendix G of the INPG is outdated as organisation structures and responsible officers in the organizations have changed. It is also anticipated that during the life of the INPG this information will change from time to time. It is therefore proposed that the details of the contact information for officers involved in the porting process not be included as a schedule to the INPG. Instead it is recommended that this schedule reflect a template for the presentation of that information as should be shared and notified pursuant to paragraph 5.1.9 of the INPG.

The proposed modification to Appendix G is as follows:

APPENDIX G – TEMPLATE FOR NUMBER PORTABILITY CONTACT INFORMATION

Name of Organization:

<i>FUNCTIONAL AREA</i>	<i>POSITION</i>	<i>CONTACT NUMBER</i>	<i>EMAIL</i>
<i>Help Desk/Customer service</i>			
<i>Porting Provisioning</i>			
<i>IT Systems/Technical Support</i>			
<i>Network(s)/Core Network Routing</i>			
<i>Escalation for Network</i>			
<i>Emergency Contact</i>			
<i>Sponsor</i>			

APPENDICES

APPENDIX 1

Proposed Revised Template for Porting Request Form

APPENDIX H – PORTING REQUEST FORM TEMPLATE

PORTING REQUEST FORM

*** Information required**

TO BE COMPLETED BY CUSTOMER

*Number(s) to be ported in: _____

*Donor Service Provider: _____

*Type of service on number(s) to be ported in: ☐ Prepaid ☐ Postpaid

☐ Mobile ☐ Fixed

☐ CUG

*Type of service desired after porting in: ☐ Prepaid ☐ Postpaid

☐ Mobile ☐ Fixed

☐ CUG

*Name of Customer: _____

*Address of Customer: _____

Alternative mobile number: _____

Email address: _____

*ID Type: ☐ National ID ☐ Passport ☐ Driver's Licence ☐ Other _____

*ID Number: _____

*I hereby declare and agree as follows:

that this Porting Request Form has been accurately completed by me and I shall be responsible for any discrepancy in the above information;

- i. that the Porting Terms and Conditions have been explained to me and I understand and accept same;
- ii. that _____ shall not be liable in any way to me for any losses incurred as a result of porting or failure to port.
- iii. I am appointing _____ to close my account or just specific services with the donor service provider and to port my number.

*Customer Name _____

* Signature/Mark _____

*Date: _____

.....
*** TO BE COMPLETED BY SERVICE PROVIDER REPRESENTATIVE**

I confirm that the signature on the ID matches the signature provided on the Port Request Form or Porting Register. ☐

I confirm that I have witnessed the mark or signature of the customer. ☐

I confirm that the service requested by the customer can be provided. ☐

I confirm that all required information is collected to satisfy that the customer is authorised to port the number. ☐

I confirm that the prepaid customer was advised that any remaining credit on the current service will be forfeited. ☐

I confirm that the customer was advised that all data stored in relation to the current network related services (such as in mailboxes) will expire automatically when porting takes place. ☐

I confirm that the customer was informed (for fixed number porting) that an email account or a mobile phone is required as a prerequisite to enable the receipt of messages relating to the progress of the port. ☐

Location/Address of point of sale at which the request was initiated _____

Comments:

*Full name of service provider's representative

*Signature

*Date:.....

APPENDIX 2

APPENDIX J – NPA AUTOMATED REPATRIATION PROCESS

Automated Repatriation Process



Number repatriation

PXS Imports repatriation process



Document Index

Author PXS
Date 10 November 2021
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Document History

Version	Remarks	Author	Date
1.0	Final version	PXS	22-02-2021
1.1	Updated terminology	PXS	03-05-2021
1.2	Updated terminology	PXS	08-07-2021
1.3		PXS	10-11-2021



Number Repatriation

Introduction

There are several situations where the emergency repatriation of a phone number is required. In those situations, the operators can use the repatriation functionality that is part of the Imports system.

This process description provides an explanation of the process and all steps to repatriate a phone number within the PXS Imports number portability platform.

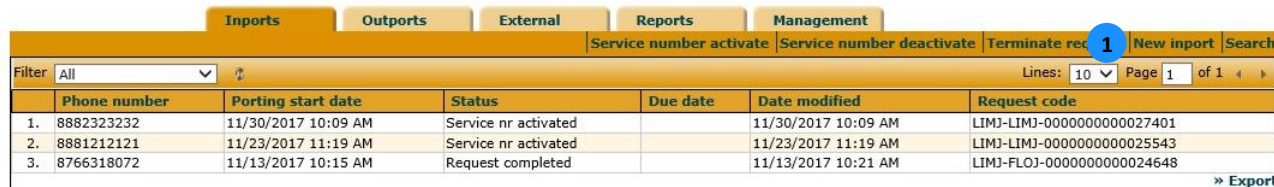
The repatriation functionality can be activated following the contractor's request. The functionality is available through both the Web GUI and the XML webservice.

Once the functionality is activated, emergency repatriation can be requested at any time during the period in which porting is prohibited (90 days after the number is ported). This period is referred to as the 'cool-off window' in the application's user interface. Repatriation requests are explicitly marked in Web GUI and XML, to easily identify such requests.

Repatriation process

Step 1

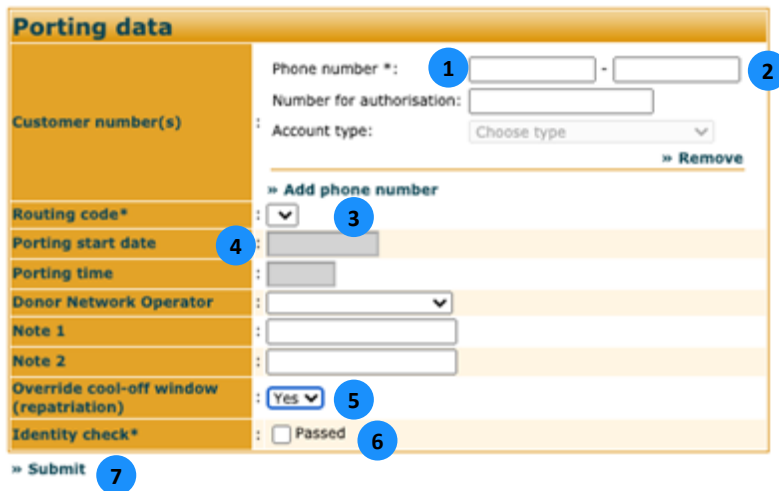
1. The recipient operator requesting the repatriation clicks 'New import'



Imports Outports External Reports Management						
Service number activate			Service number deactivate		Terminate rec	1 New import Search
Filter	All		Lines: 10 Page 1 of 1			
	Phone number	Porting start date	Status	Due date	Date modified	Request code
1.	8882323232	11/30/2017 10:09 AM	Service nr activated		11/30/2017 10:09 AM	LIMJ-LIMJ-0000000000027401
2.	8881212121	11/23/2017 11:19 AM	Service nr activated		11/23/2017 11:19 AM	LIMJ-LIMJ-0000000000025543
3.	8766318072	11/13/2017 10:15 AM	Request completed		11/13/2017 10:21 AM	LIMJ-FLOJ-0000000000024648
						» Export

Step 2

1. Enter the digits of the number to be repatriated
2. Hit the tab button to determine the number range's end
Number is automatically added to the second field. In case of a range, please enter the end of the range in the second field
3. Select the 10-digit LRN (local routing number)
4. Select the porting start date
If left blank, the system will automatically select the first possible porting date and time within the porting window
5. Select 'Yes' for Override cool-off window (repatriation)
6. After internal customer identity verification, confirm the 'Identity check' as passed
7. Click 'Submit' to submit the port request



Porting data

Phone number *: 1 [] - [] 2

Number for authorisation: []

Account type: Choose type [v] » Remove

» Add phone number

Routing code* [v] 3

Porting start date 4 []

Porting time []

Donor Network Operator [v]

Note 1 []

Note 2 []

Override cool-off window (repatriation) [v] Yes 5

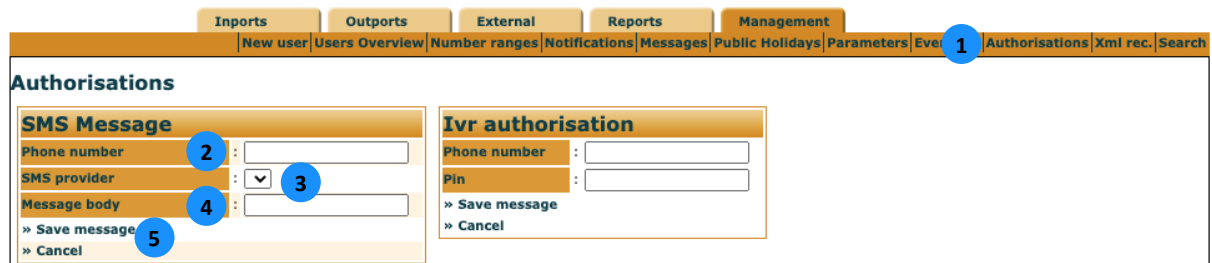
Identity check* [] Passed 6

» Submit 7

Step 3

Just like a regular port request, when submitting the repatriation request, customer authorization is required. In case the customer has no access to its phone or SIM-card to send the text message, the current (donor) operator can be asked to generate a manual authorization. This is typically the situation when repatriation is required as a consequence of an outport following a stolen sim card. This can be done in the Inports GUI (Management tab > Authorizations)

1. The donor operator clicks 'Authorizations'
2. Enter the digits of the phone number to be repatriated
3. Select the SMS provider (the donor operator)
4. Enter the Message body ('PORT')
5. Click 'Save message' to submit the manual customer authorization
6. The donor operator responds with either:
 - a. Agreement (code 00) → *proceed with step 4*
 - b. Block (codes 01, 02, 03 or 04) → *end of process*



Authorisations

SMS Message

Phone number 2 []

SMS provider [v] 3

Message body 4 []

» Save message 5

» Cancel

Ivr authorisation

Phone number []

Pin []

» Save message

» Cancel



Step 4

After the donor operator generated a customer authorization (or after the customer sent the authorization by himself), the current operator receives the repatriation port request that was submitted by the recipient operator. In both the GUI and XML-message the 'Override cool-off window' is marked with 'Yes'.

Porting data	
Request code	:
Date created	:
Date modified	:
Porting start date	:
Change date	:
Due date	:
Date actual	:
Recipient Network Operator	:
Donor Network Operator	:
Routing code	:
Status	:
Note 1	:
Note 2	:
Override cool-off window (repatriation)	Yes

1. The donor operator responds with either:
 - a. Agreement (code 00) → *proceed with step 4*
 - b. Block (codes 01, 02, 03 or 04) → *end of process*

Step 5

1. On the day of porting, the recipient operator selects 'Instruction Request' to repatriate the number
2. The system sends the Broadcast Message to all operators, confirming the number is ported to the recipient operator
3. The donor operator disconnects the number from its network, by:
 - a. Selecting the response code 30 (OK)
 - b. Clicking 'Send Instruction Response'

Imports							Outports	External	Reports	Management
Filter: All							Service number activate Service number deactivate Terminate request New import Search			
Lines: 10 Page: 1 of 1										
1.	888121211	11/30/2017 9:00 AM	Authorisation requested	12/1/2017 5:00 PM	11/30/2017 5:00 AM	DIGI-LIMJ-00000000000027395				
2.	8885656565	12/1/2017 9:00 AM	Authorised	12/5/2017 5:00 PM	12/1/2017 9:14 AM	DIGI-LIMJ-00000000000027430				
3.	8882323232	11/30/2017 10:09 AM	Request completed		11/30/2017 10:13 AM	DIGI-LIMJ-00000000000027402				
4.	8889696969	11/28/2017 3:41 AM	Service nr activated		11/28/2017 3:41 AM	DIGI-DIGI-00000000000027305				

Evaluate Import	
Porting data	
Request code	: DIGI-LIMJ-00000000000027430
Date created	: 12/1/2017 8:52 AM
Porting start date	: 12/1/2017 9:00 AM
Change date	:
Due date	:
Date actual	:
Date modified	: 12/1/2017 9:14 AM
Recipient Network Operator	: DIGI
Donor Network Operator	: LIMJ
Routing code	: 876388921
Status	: Authorised
Note 1	:
Note 2	:

Customer Data	
Customer ID	:
Company name	:
Initials	:
First name	:
Last name	:
Address Line 1	:
Address Line 2	:
Post Code	:
City	:
Country	:
Contact phone number	:
Email	:

Item data				
Start	End	Number for authorisation	Resp. code	Resp. note
8885656565	8885656565		00	

1 → Instruction request
→ Abort request