

**Response to
Consultation on Policy Recommendations for the
Implementation of Number Portability (NP) in ECTEL States**

Initial Comments

**Response from
Columbus Communications Limited**

Submitted January 25 2016

1. INTRODUCTION

- 1.1 Columbus Communications Limited (Columbus) thanks the Eastern Caribbean Telecommunications Authority (ECTEL) for the opportunity to provide input to the Consultation on Policy Recommendations for the Implementation of Number Portability NP in ECTEL Member States. The views expressed herein are not exhaustive. Failure to address any issue in our response, does not in any way indicate acceptance, agreement or relinquishing of Flow's rights.
- 1.2 Telephone numbers are national resources, and we firmly believe that this resource should be used in a way that most effectively and efficiently fosters the development of a competitive market. Columbus supports the objective to implement NP in the various ECTEL countries. We note that the purpose of this consultation process is to define key policy parameters to guide the actual implementation. Below we provide comments to specific recommendations.

2. Recommendation 5

- 2.1 Recommendation 5 is that the NP Clearing House may either be operated from ECTEL or hosted overseas. In reviewing the options (locally based in an ECTEL jurisdiction, outsourced to a provider extra regionally or a regional provider), we note the advantages and disadvantages presented in the document. International best practice indicates that number portability transaction processing including database operations is best done through a neutral centralized clearinghouse.
- 2.2 It is unclear whether the factor of a neutral vs. a connected party is considered in addressing the advantages and disadvantages of the various options. Nevertheless, it is our considered view that the advantages of the outsourcing to a neutral third party with proven experience would be the most efficient and effective option. As the regional regulator, ECTEL is a connected party, and would also need to acquire or develop the capacity to provide such services.

- 2.3 Columbus recommends the NP Clearing House is contracted to a neutral third party and hosted overseas.

4. Recommendation 11

- 4.1 Recommendation 11 provides that NP will be implemented and launched to the ECTEL public within 12 to 15 months from the official launch of the ECTEL NP programme to the operators and NP stakeholders. The timing of the official launch to stakeholders including operators not clear. As such we request clarification as to what ECTEL considers as the official launch timeframe.
- 4.2 Based on our experience with the launch of NP in Jamaica for example Columbus recommends that the date should be determined and agreed by the stakeholder group / committee that is planning and executing the implementation.

5. Recommendation 13

- 5.1 Recommendation 13 is that all customer porting requests will be completed within; 1 working day for mobile NP and 5 working days of fixed NP, from the date of the customer's validated and signed porting request. These timelines seem consistent with what obtains in several jurisdiction around the world. In many instances these outcomes have been based on experience post implementation.
- 5.2 We recommend that these target timelines be confirmed through deliberation by the stakeholder group / committee looking at the implementation.

Concluding Comments

We look forward to providing further comments in subsequent phases of this process.
Kindly direct any communication in relation to this response to:

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