

Response to Consultation Document NP 01/13: Comments on Number Portability

Dear Ing. Micallef,

Having worked with one of the major telephony operators during which I was involved in the testing and launch phase of number portability, as well as currently working with the NRA and forming part of a team who oversees the implementation and successful running of number portability, below please find some comments on the consultation issued on the implementation of number portability in Bermuda.

Yours sincerely,
Ing. David Scerri
Malta Europe

Responses to consultation

Q2:- As regards to the routing proposals, the option of making a list of ported numbers available to overseas operators does not seem to provide any added benefits. This is due to the fact that the routing function carried out by the foreign operator is usually based on the first 2 to 3 digits of a number rather than carry out the routing operation on a whole number. In addition to the technical complexity referred before, the foreign operator will route overseas calls towards an operator with whom it has established an interconnection agreement in that particular country irrespective whether the called party is served by that operator or not.

Q3:- In order to avoid carrying out complete re-hauls in the technical infrastructure as well as in the ordering process in the future, implementing primarily the solution as proposed for option A would be the ideal situation. The process for option A can then be reviewed in the future in order to address any minor issue which might emerge following the launch of the NP process and improving the process accordingly.

Q4:- The authority should impose a single solution with which all the operators will have to abide with in order to avoid having multiple solutions offering the same NP service. However, the proposed solution should take into consideration the costs and benefits of the solution proposed, whilst allowing specific technical solutions which would still reach the same service levels.

Q6:- Unless an adequate interconnection framework for special tariff numbers is established, the market for such a service will not emerge and therefore the need for porting of such numbers will be almost nonexistent. Thus, portability of special tariff numbers should be postponed until the underlying special tariff number framework is deployed.

Q7:- Whilst the number of porting might exceed 100 portings during the first few days following the introduction of the new NP service, new market players, or new service packages, the proposed

number of 100 portings sounds reasonable when taking into consideration the population size of Bermuda. However, during the drafting stages of the underlying specifications, one should take into consideration such scenarios and include adequate provisions in order to avoid any NP service interruptions during such instants.

Q8:- The selection of whether to implement a central or distributed database will depend on a number of factors which the authority, together with the operators needs to take into consideration. Irrespective whether a centralised or distributed database is adopted, the solution implemented should include automated audited process whilst maintain to a minimum any human intervention (such as request carried out via email including attachments or updating of porting transactions within spreadsheets)