



**Trinidad & Tobago
Computer Society**

Trinidad and Tobago Computer Society
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Telecommunications Authority of Trinidad and Tobago
#5, Eighth Avenue Extension, off Twelfth Street,
Barataria, Republic of Trinidad & Tobago

May 31 2011

Re: Trinidad and Tobago Computer Society's comments on "Draft Implementation Plan on Number Portability For The Republic of Trinidad and Tobago"

Dear Sir/Madam,

The Trinidad and Tobago Computer Society (TTCS) is pleased to submit to the Telecommunications Authority of Trinidad and Tobago (TATT) our comments on the "Draft Implementation Plan for Number Portability For the Republic of Trinidad and Tobago" dated March 31 2011 as posted on TATT's website at <http://www.tatt.org.tt/LinkClick.aspx?fileticket=sP4J-z4tYWk%3d&tabid=120>

We solicited comments from our email list, Facebook and Twitter feed and held one public meeting (<http://post.ly/238oh>) where members met to discuss the document and to compose this response.

Kind Regards,

A handwritten signature in black ink that reads "Dev Anand Teelucksingh".

Dev Anand Teelucksingh
Secretary, Trinidad and Tobago Computer Society
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TATT CONSULTATION COMMENT SUBMISSION FORM

Name of Document: Draft Implementation Plan on Number Portability For The Republic of Trinidad & Tobago

1. Respondent Category:

- (a) Regional regulatory or governmental agencies
- (b) Existing service and/ or facility providers and affiliates
- (c) Potential service and/ or facility providers and affiliates
- (d) Service provider associations/ clubs/ groups
- (e) Consumers/ consumer groups
- (f) General public

2. Interest

The Trinidad and Tobago Computer Society (TTCS ; <http://www.ttcsweb.org/>) is a computer user group based in Trinidad. Operating since 1997 and incorporated as a non-profit organisation in 2004, we :

- are a forum where computers, related technologies and related social issues are discussed.
- keep current with the events in the local Information Technology (IT) and telecommunications industries.
- “Network local computer users” so that they can share knowledge and improve upon their experiences with modern technology.

3. Contact Information:

Respondent's Name: Trinidad and Tobago Computer Society
Postal Address: 112A Edward Street, Port of Spain, Trinidad
Email Address: admin@ttcsweb.org
Contact Number: 684-1796

4. Comments

Document Section	Comments	Recommendations
<p>1. Introduction (Page 5)</p>	<p>The TTCS welcomes the Draft Implementation Plan for Number Portability as:</p> <ol style="list-style-type: none"> 1. Service providers (concessionaires) would offer better customer service, better services and infrastructure as a unsatisfied customer can more easily take their existing phone number to an alternative service provider. 2. Since you don't have to call every single person in your contacts when you move to a new provider, this means that you have relatively minor communication issues which positively impact the person and the business. 3. For Businesses, this means keeping your phone number permanently while changing providers (concessionaires) thus making phone numbers more of a marketing tool 4. Consumers now have more power to choose their provider of choice without the hassle of losing friends, family, customers, etc 	
	<p>The TTCS notes a significant disadvantage of number portability depending on its implementation:</p> <p>How can users know how much a phone call will cost?</p> <p>A user, either on the originating network (when dialling a number) or the recipient network (when seeing a caller id of the incoming call) cannot easily identify which network/provider the number belongs to.</p> <p>This is significant because:</p> <p>(a) Calls/SMS/MMS, etc within the same provider are typically less expensive than calls between providers.</p> <p>If the caller (person making the call) knows which network/provider the callee (person</p>	<p>Users should know when calling a phone number whether such a number is ported (on a different network).</p> <p>Thus, we strongly support a form of announcement be used to alert the user of an "off net" call as outlined in Section 7.5.</p> <p>The Number Portability System should be able to allow persons receiving a call and with a PBX to indicate if the number is ported (i.e. on a different network) or not. This is needed to ensure that call accounting reconciliation is accurate.</p>

	<p>being called) is on, the caller may choose to call using a phone on the same network/provider as the callee.</p> <p>Many mobile phone users either typically have a phone per mobile provider or use dual sim phones for this reason. If the number becomes portable then it would become very difficult for the caller to apply the above strategy of using a phone with the same provider as the callee. This in effect means the caller may have to pay more for their calls since the caller will be unaware of the costs being incurred until the caller gets the phone bill, which are typically not itemised.</p> <p>If the calling rates would be flat rates within and between concessionaires then no solution is required since cost is the same.</p> <p>(b) The same problem as (a) above can be extended to businesses who has implemented Least Cost Routing (LCR).</p> <p>LCR basically is the ability for a PBX (Private Branch Exchange or internal telephone network) to select the appropriate trunk line (connected to a particular provider) for a caller that would in effect be the lowest cost.</p> <p>E.g. If a user calls a TSTT number then the PBX would select a TSTT trunk line to make the call, based on the number being dialed.</p> <p>(c) An extended problem of (b) is Call Accounting or Call Reconciliation. Most PBXs have some form of call accounting to appropriately charge relevant departments within an organization for the calls they have made.</p> <p>Some call accounting packages would therefore become unreliable since most if not all Call Accounting packages are based on the number being called.</p>	<p>If the costs of a phone call within and between different network providers was fixed then this would greatly simplify costs to consumers and would allow proper billing/reconciliation by companies using PBXs</p>
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<p>3.4.1 Location Portability (Page 10)</p>	<p>“In the absence of a ‘unified’ rate structure unpredictable billing patterns may act as a disincentive to users to port their telephone number. Until a single national rate for fixed line service is introduced, the Authority expects that there will be suppressed demand for location portability outside of the rate area at this time.”</p> <p>While a Single National Rate (cost per minute) would simplify cost calculations, the effect would be to raise the cost of phone calls for users and businesses alike. For example, a food delivery service calling a customer for directions within the area would usually pay a single charge for a call that can take several minutes. A Single National Rate would mean a call that used to be 23 cents will be a dollar or more. The cost of doing business for companies (a conference call between companies within a area) instead of 23 cents per caller would be much higher with a per minute rate. Since the cost of doing business will increase, companies will have no choice but to pass the increased costs of doing business to their customers and the general public.</p> <p>Given that the cost of a phone call within the incumbent’s exchange was a fixed cost PER CALL, given the size of Trinidad and Tobago, that the cost of a fixed line phone call should be a fixed cost PER call</p>	<p>The Authority should consider a fixed cost PER call, instead of a Single National Rate (cost per minute) within a domestic fixed line concessionaire’s network.</p>
<p>3.4.2 Service Number Portability (Page 11)</p>	<p>“The Authority does not wish to deter the technological development of a concessionaire’s network and as such makes no policy decision on this issue. The Authority will revisit this issue at a later date as the market matures.”</p> <p>Service Providers typically use service upgrades as a means to raise the fees for using the service.</p>	<p>The Authority should be vigilant and review any fee increases with respect to service upgrades performed by service providers.</p>

<p>4.1 - "Methods of Implementation" (Page 14)</p>	<p>"There are basically two methods of implementing service provider number portability, either of which can be used for the porting of both mobile and fixed line numbers: a) bilateral, b) centralized /clearing house"</p> <p>The Centralised/clearing house is the favourable approach to the methods of implementation of the Service Provider Number Portability. We note that there must be redundancy built into this which included redundant hardware as well as a hot backup site to cater for a well-defined SLA as to the uptime of this service.</p>	<p>The Authority should ensure that the method of implementation chosen should be reliable and resilient as possible, with appropriate levels of hardware redundancy as well as a hot backup site to ensure uptime of the service.</p> <p>The Authority should evaluate a scenario such as a natural disaster which would be a significant event that would affect service providers and how service could be restored in the shortest possible time.</p>
<p>Section 4.2 "Implementation Schemes" (Page 14)</p>	<p>"a) Onward Routing – OR, b) Query on Release- QoR, c) Call drop back, d) All Call Query- ACQ"</p> <p>The All Call Query – ACQ Scheme is welcomed for both Fixed Line and Mobile calls. Proper Security Systems must be implemented for the NPDB (Number Portability Database)</p>	<p>The All Call Query - ACQ implementation scheme the querying and routing of fixed and mobile calls is preferred ; The Authority should review the NPDB and/or the party maintaining the NPDB to ensure the confidentiality of data held by the NPDB or the entity maintaining the NPDB is maintained.</p>
<p>Section 4.3 "Popular method for Implementation of Number Portability" (Page 20)</p>	<p>A question arises with respect to businesses who have Call Accounting Systems and the need to reconcile their accounts.</p> <p>How did businesses in countries such as the Dominican Republic and Singapore reconcile their Call Accounting Systems with the issue that a portable number may have a different rate from a non-portable number?</p>	<p>The cost of a call to a ported number should be the same as the cost to a non-ported number.</p>
<p>Section 5 "Proposed Implementation Plan for Number Portability n Trinidad and Tobago" (Page 21)</p>	<p>"3. The administrative procedures necessary for inter-operator working to support a porting time of no more than two working days for fixed line and mobile services. These procedures shall not be burdensome on the customers so as to deter them from porting"</p> <p>This Service Level Agreement (SLA)</p>	<p>The Authority should consider penalties to be imposed on service providers if this SLA requirement is not met.</p>

	requirement is welcomed by the TTCS.	
Section 6.3 “Cost to port” (Page 27)	<p>“The Authority proposes that no charge shall be levied on users when porting their mobile and fixed line telephone numbers.”</p> <p>The TTCS supports this proposal from TATT</p>	
Section 7.3 “SMS Service” (Page 29)	<p>“The concessionaires shall be required to provide SMS service to all ported mobile telephones”</p> <p>The concessionaire should ensure that the SMS works across all concessionaires. i.e. an SMS can be successfully sent from Provider A to Provider B.</p>	
Section 7.4 “Unlocking of mobile handsets”	<p>“The Authority proposes that concessionaires shall remove, at no cost to the user, their lock code on mobile telephone handsets at the request of the user provided the contract term has expired. Where the contract term has not expired, section C20b of the concessionaires’ document shall apply.”</p> <p>The TTCS welcomes this statement of purpose.</p>	
Section 7.5 “Off net” alert (Page 31)	<p>This is welcomed especially for businesses with call accounting systems that need to distinguish an “On net” call from an “Off net” call.</p> <p>If Call Accounting Systems cannot distinguish this then there will be challenges with respect to reconciling accounts.</p>	
Section 7.6 “Abuse of porting facility” (Page 31)	<p>While this is a potential form of abuse, the TTCS is of the the view that it is important for users to be able to switch to an alternate provider (even back to the original provider) if they are unhappy with the service provider (be it quality of service, costs, etc). Having to wait up to six months to be able to switch to a alternate provider is too long and we recommend a shorter period of say three months</p>	<p>For users to have a choice of service providers, users should be allowed to port a telephone number at no cost once in every three month period.</p>

Appendix 1 "Number Portability Implementation in Europe" (Page 32)		After implementation in Trinidad and Tobago, similar statistics should be collected by the Authority and should be published for the public to determine trends
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5. Confidentiality

The information and comments stated above can be published by the Authority for the purposes of consultation.

Agree

Do not agree because:

- All comments submitted are confidential
- Some of the comments submitted are confidential. (In the information submitted in Section 4 above, please indicate what information should be considered as confidential by the Authority.
- Name of Respondent/Name of the Organisation is confidential

If you do not want part of your response, your name or the name of your organisation to be published, can the Authority still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or your identity)?

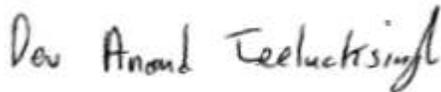
Yes

No

6. Declaration

I confirm that the comments and recommendations submitted under this cover sheet is a formal consultation response that the Authority can publish, exclusive of those comments marked confidential.

Signature:



Position of signatory: Secretary, Trinidad and Tobago Computer Society