



Annexure A

QUESTIONNAIRE: INQUIRY INTO NUMBER PORTABILITY REGULATIONS

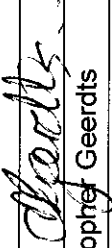
SECTION A - GENERAL

Licensee Details

Licensee Name	Ohreh Telecoms cc
Address	9 First Road, Boksburg
Contact Person	Christopher Geerdts
Designation	Chief Operating Office
Telephone	010 786 0000
Email	chris@otel.co.za

Services Offered by Licensee (select all that are applicable):

Retail	
Geographic	Full-service telephony
Mobile	
Wholesale	
Other (Specify)	Full-service telephony

Any confidential information must be marked as such and a request for confidentiality made in terms of Section 4D of the ICASA Act		
Signature		
Designation	Christopher Geerdts	Date: 28 / 10

I, Christopher Geerdts, in my capacity as Chief Operating Officer hereby confirm that the information provided herein is true and correct.

Notes:

The main purpose of the submission is to draw attention to 3 items: the need to be stricter about timer violations (especially with donor's releasing numbers), the need to drop clause 4(11) and amend 4 (9) of the functional specifications to bring in line with de facto practice and the need to ensure operators maintain routes to ported numbers as well as acceptable call quality.

Mobile and Geographic Numbering Indicators

SECTION B: MOBILE NUMBER INDICATORS			
Mobile Number Indicators	Indicators	From Inception to Date	Comments
	Total Mobile Numbers Allocated	N/A	
	Total Mobile Number subscriptions		
	Prepaid		
	Post-paid		
	Mobile Numbers Ported In		
	Mobile Numbers Ported Out		

SECTION C: GEOGRAPHIC NUMBER INDICATORS				
Geographic Number Indicators	Indicators	From Inception to Date	Comments	
	Total Geographic Numbers Allocated	8000	8 x 1000 ranges allocated by ICAA	
	Total Geographic Numbers' subscriptions		Could not determine precise amount. Reseller detail is not known.	
	Prepaid			
	Post-paid			
	Geographic Numbers Ported In	Approx 1200		
	Geographic Numbers Ported Out	Approx 400	Total ports in and out is 1613 but exact split not known	

Numbering Portability Regulations Questionnaire

1. Describe your company or personal involvement in number portability

Company ports numbers for own retail customers as well as on behalf of resellers
I manage the team that ports the numbers

2. Describe your company's positioning in the fixed line and/or mobile markets.

Ohren is a leading provider of fixed-line telephony (and broadband) services, especially to consumers and SMEs
and via resellers

3. What would you consider to be the advantages and/or disadvantages with the current number portability framework and administration thereof?

The system generally functions and if the correct documentation is available and process followed, the port
process timing and outcomes are reasonably predictable
Disadvantage: ICASA should have an associated desk where violations can be escalated in real time and
resolution achieved.

4. Would you consider the fees structure associated with participating in Number Portability such as cost recovery, subscription to number portability administration and charging of ports to be effective?

Yes, for individual numbers ports.
Block ports should be discounted as they are part of one process and the costs make it unfeasible to port

5. Would you say that there is a need to review the block sizes for Number porting? Please elaborate.

No

6. What is the mean porting timeframe, in hours, have your subscribers experienced? Do you consider it to be reasonable? If not, please indicate what challenges have you experienced and what measures could be taken to reduce the porting timeframe.

The quickest is about 3 days and the longest over three weeks (excluding staggering at customer request)
ICASA should be very strict in monitoring and policing the time frames for releasing numbers. The biggest delay is in donor release. Operators can ignore requests with impunity and some have no updated contact information or fail to respond

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7. Do you think the current geographic porting at the local area code exchange promotes effective number portability? If not, please elaborate and propose alternatives if any

No. On VoIP systems, local area code has no relevance. The current restrictions are often a stumbling block
Customers should be able to take their numbers wherever they wish.

8. What other non-geographic numbers do you think should be subjected to number portability besides mobile numbers? Please elaborate

08 numbers. Companies rely on these as their advertised inbound numbers and this is a major hurdle to porting.
In particular : 080, 086, 087

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9. Do you think the port back waiting period of two (2) months in the current number portability regulations promotes effective number portability? If not, please elaborate and propose alternatives if any

Yes

10. Which provisions of the Number Portability regulations including the functional specifications do you think should be reviewed to improve the efficiency and effectiveness of porting?

One significant change is requested: Currently customers can port out regardless of their outstanding balance or contract settlement amounts. The customer may not be technically "suspended" but may be substantially in arrears or have significant ongoing contract commitments (including amortisation or financing of hardware provided). Request is to drop 4 (11) and amend 4 (9) of the functional specifications to expand the scope of when

an operator can reject a port. Operator should be able to reject a port if customer has not met contractual obligations, is in arrears or has not settled on contractual commitments going forward.
The changes being proposed actually represent the current <i>de facto</i> way of operating, including by the largest fixed operator as well as by other large operators. The regulations need to be updated to match widespread industry practice (which is also good practice, for the reasons given above)
Failure to make this change puts operators at substantial risk of incurring debt.

11. Do you think the number of days it takes to port should be increased or decreased? Please elaborate and provide alternatives if any

This should be decreased by reducing timers and rationalising the message steps
Currently the priority is to make changes so as to be able to police the existing timers in real time.

12. Do you think the current recipient led porting process is effective? Please elaborate and provide alternatives if any

The overall concept is potentially effective.

13. Do you think there should be a standard/uniform call routing mechanism? Please elaborate

Uniform mechanism is not needed and may not be practical for the smaller operators to implement. However there must be a mechanism to enforce the effective routing of inbound numbers to the correct operator.
Customers from time to time battle to call ported numbers because larger operators are not accountable to
Maintain effective routing and top call quality. In other words, a caller from a large operator either can't reach a ported number or suffers poor audio, and both the caller and the called party (owning the ported number) have
Inadequate recourse.

14. Do you think the processes and procedures for resolving subscriber complaints and providing subscribers remedies are efficient? Please elaborate.

More people may use this service if they know it exists, if the steps are communicated and are simple and if
They believe that it is worth the effort of complaining to achieve a result

15. Do you think that consumers are adequately protected by the Number Portability regulations? If not, please elaborate and provide alternatives.

No. Because there is no close monitoring, donors can violate the regulations with impunity.
ICASA should be geared to respond to and deal with violations within short enough time periods to ensure effective adherence (particularly by larger operators)
Issues to monitor closely are: donor not releasing numbers and operators not ensuring their customers can call all ported numbers and maintaining adequate audio to those numbers.

16. Please submit any other information that you believe the Authority should consider.

It is suggested that the CRDB system includes details of the porting contact person for each participating operator. It should be obligatory for operators to provide this information and ensure it is up-to-date.
That will contribute partly to addressing conflicts or violations.