



Fixed Number Portability

The Ministry Of Information And Communications Technology (“ictQATAR”)

Public Consultation Document

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1 Background

In January 2013 Ooredoo Q.S.C (Ooredoo) and Vodafone Qatar Q.S.C (VFQ) made available to their customers the facility for the customer to retain their mobile number when they changed their service provider, Mobile Number Portability. This was in accordance with their mobile service licenses and ictQATAR policy.

The Fixed Line licenses of Ooredoo and VFQ includes a requirement to introduce the same facility for fixed-line customers, Annexure J clause 5.1 and Annexure J clause 4.1 respectively.

To enable Ooredoo and VFQ to fulfil their license obligations, ictQATAR will introduce a policy for Fixed Line Number Portability (FNP).

To build on Ooredoo and VFQ's experience of implementing MNP, ictQATAR sought "without prejudice" comments from both service providers on the content of the policy. ictQATAR received helpful input from both service providers and responded with ictQATAR's initial thinking on the various points that they raised. The draft policy, on which ictQATAR is now consulting, reflects our conclusions on the comments received.

The purpose of this consultation is to seek formal views from all interested parties, including Ooredoo and VFQ.

2 Fixed Number Portability Policy

While there are some significant differences between the provision of mobile and fixed-line services that will impact on the detailed implementation of Number Portability, it is ictQATAR's intention that the FNP and MNP Policies should be consistent. The only differences should be limited to those required by the nature of the services. ictQATAR believes that this will have a number of benefits, including:

- Consistency of customer procedures;
- Simplifying the process of implementing the facility; and
- Minimising the implementation costs to the service providers.

The definition of Fixed-Line services is contained in the licenses and ictQATAR will adopt those for this Policy. ictQATAR wish to encourage customer choice of service providers and we believe that this will be enhanced if customers are able to retain their numbers when they move some or all of their services from one service provider to another. Therefore, ictQATAR intends that customers can move individual fixed-line services and port only the numbers associated with those services. There should not be a requirement for a customer to move other services to the recipient service provider.

ictQATAR is aware that all telecommunications service providers have an on-going programme of network and system upgrades to enhance customer service. The introduction of FNP has to be programmed into these upgrade cycles. In addition, the testing of the facility is more complex than many upgrades as it involves the interworking of two (or more) service providers systems and (potentially) that of a specialist supplier of a Number Portability system. This has to be balanced against the customer benefits of FNP. The draft policy includes an implementation timetable that balances these against the customer benefits from an early introduction of FNP.

The nature of the provision of fixed-line services require different actions by the service providers than those used for MNP. ictQATAR is aware that a number of countries now require that porting of a customers fixed-line number is completed within one working day. Nonetheless, ictQATAR considers that the number should be ported when the customer requires it providing that this does not exceed five working days for private customers and 10 days for enterprise customers.

ictQATAR is aware that 'slamming' (the transfer of a customer's service from one provider to another without the customer's agreement) has occurred in some countries. To avoid this, the MNP process includes the requirement for the customer to provide a positive acknowledgement of the transfer using an SMS message. The SMS facility is not available with fixed-line services. Therefore, ictQATAR has included the requirement and the customer must provide their account number when requesting the port of their number and, for enterprise customers, a letter of authority from the owner with a copy of the CR

ictQATAR recognises the legitimate concern that portability could create situations whereby a customer does not settle their bill with the Donor Operator. We also acknowledge that the prevention measures in the MNP processes are complex and may act as a barrier to customers wishing to port their numbers, especially for enterprise customers. Nonetheless, for consistency between the MNP and FNP processes, we intend to retain the requirements of the MNP Policy.

3 Consultation Questions

In keeping with an open, transparent process, ictQATAR invites stakeholders to express their views on the issue and/or to respond to the questions raised below:

1. Are we correct in adopting common policies for MNP and FNP that only vary where required by the nature of the services?
2. Do you agree that FNP should be applied to all fixed line services defined in the operator's licenses? If not, which services should be excluded and why?
3. What should be the maximum porting periods between a customer requesting the recipient operator to port of their number and completion of the port?
4. Does the provision of a customer's account number provide adequate protection against slamming? If not, what is the degree of risk with this approach and how can the risk be mitigated in a proportional manner?
5. How can the debt management processes be simplified without introducing unreasonable risks of bad debts for the donor operator.

4 Instructions for Responding to this Consultation:

4.1 Consultation Procedures

All interested parties are invited to submit responses to the questions specifically identified in this document and to provide their views on any other relevant aspects. Comments should reference the number of the question being addressed or the specific section of this document if not responding to a particular question.

ictQATAR asks that, to the extent possible, submissions be supported by examples or relevant evidence. Any submissions received in response to this consultation will be carefully considered by ictQATAR when progressing to revised NNP. Nothing included in this consultation document is final or binding. However, ictQATAR is under no obligation to adopt or implement any comments or proposals submitted.

Responses should be submitted by email to numbering@ict.gov.qa and the deadline for receipt is close of business on 26th of December 2013.

Any submissions received in response to this consultation will be carefully considered by ictQATAR when preparing the Order. Nothing included in this consultation document is final or binding. However, ictQATAR is under no obligation to adopt or implement any comments or proposals submitted.

4.2 Publication of Comments

In the interests of transparency and public accountability, ictQATAR intends to publish the submissions to this consultation on its website at www.ictqatar.qa. All submissions will be processed and treated as non-confidential unless confidential treatment of all or parts of a response has been requested.

In order to claim confidentiality for information in submissions that stakeholders regard as business secrets or otherwise confidential, stakeholders must provide a non-confidential version of such documents in which the information considered confidential is blacked out. This “blacked out” text should be contained in square brackets. From the non-confidential version it has to be clear where information has been deleted. To understand where redactions have been made, stakeholders must add indications such as “business secret”, “confidential” or “confidential information”.

A comprehensive justification must be provided for each and every part of the submission required to be treated as confidential. Furthermore, confidentiality cannot be claimed for the entire document or whole sections of the document as it is normally possible to protect confidential information with limited redactions.

While ictQATAR will endeavor to respect the wishes of respondents, in all instances the decision to publish responses in full, in part or not at all, remains at the sole discretion of ictQATAR. By making submissions to ictQATAR in this consultation, respondents will be deemed to have waived all copyright that may apply to intellectual property contained therein.

If you have any questions or concerns, please contact Numbering Management Section, Technical Affairs Dpt (numbering@ict.gov.qa).

Annex – Draft FNP Policy

Fixed Number Portability Policy for the State of Qatar

Implementation Time Scales

The operators will implement and launch the Fixed Number Portability (FNP) service to customers according to the following timetable:

Activity	Completed By:
Policy Consultation Period and Policy issued	28 th February 2014
Vendor selection process (if necessary) and Vendor agreement (including design phase)	30 th June 2014
Code of Conduct and IoA agreed	30 th September 2014
Technical implementation and intra-operator testing	31 st March 2015
Inter-operator testing / Friendly User Testing	30 th June 2015
Fixed Number Portability Available to Customers	6 th July 2015

Scope of Fixed Number Portability

FNP shall apply to all Authorized Telecommunications Services as defined in the fixed service licences. At the time of issuing this ictQATAR Policy these services are:

- (a) Domestic and international Public Fixed Telecommunications Services;
- (b) Value Added Services;
- and
- (c) Any ancillary services that are provided as an adjunct to or in support of these services.

Changes to the Authorized Telecommunications Services in the licence shall be deemed to be changes to this Policy.

Customers are not obliged to move all the services that they receive from a Donor Operator to the Recipient Operator when they port their number.

Cost recovery principles

Operators will bare their own costs of upgrading their networks and systems in preparation for NP implementation. This cost will include establishing and maintaining relevant interfaces and links with any centralised service (administration or call routing) where appropriate.

Allocation of Administrative Costs (per Port Setup cost)

That the Recipient Operator pays the agreed charges for each successful port dependent on the commercial agreements made with the Donor Operator and/or administrator of any automated order process system.

That the Donor Operator is allowed to recover only its reasonable incremental administrative costs of NP from the Recipient Operator.

Customer Prices

Recipient Operators will be allowed to charge the ‘imported’ customer the cost of Number Portability.

That the Recipient Operator should treat as a commercial judgement the decision on whether it charges the porting customer the cost of the port as a direct charge or as an indirect charge or to make no charge at all.

ictQATAR (while allowing the Recipient Operator to make their own commercial decision on the customer price that they charge for NP) will introduce a reasonable price ‘cap’ where appropriate and necessary.

For the avoidance of doubt, the Donor Operator is not allowed to charge the ‘exporting’ customer the cost, or part of the cost, of NP.

Allocation of Additional Conveyance Costs

That each originating operator bears their own additional cost of conveying calls for ported numbers to the Recipient Operator.

NP Technical Routing Solutions

It is the responsibility of the call originating operator to route calls to ported numbers directly to the Recipient Operator without reference to the Donor Operator.

Order Handling Process Options

That the operators implement a port order process that can meet all the requirements associated with the port order flows and timelines; including (but not limited to) the projected porting volumes.

The port order process shall follow that adopted for MNP, except where this Policy differs from the MNP policy.

The operators shall implement a port order process that allows the introduction of subsequent operators in an efficient and cost effective manner.

For the avoidance of doubt, the port order process cannot be used to exclude any subsequent operator on any basis whatsoever.

The port order process shall be cost effective.

Porting Times

Port orders of individual numbers or groups of numbers shall be scheduled to conform with the customer’s requirements and to permit any engineering activities to be planned. The customer must be informed in writing of the scheduled port time and advised that temporary service disconnection may occur. The scheduled port time shall not be more than five working days from when the Recipient Operator submits the order to the Donor Operator.

The Donor Operator shall provide the confirmation of receipt of the port order to the Recipient Operator and that the port will occur at the scheduled time within 2 working hours of receiving the port request from the Recipient Operator. The exception is where there is an outstanding bill,

issued prior to the port request being submitted by the Recipient Operator. In that case, the Donor Operator shall provide the confirmation of receipt of the port order scheduled time within 2 working hours of receiving the port request from the Recipient Operator, and confirmation that the port will occur at the scheduled time within 2 working hours of receiving the full payment of the outstanding amount from the customer, irrespective of any payment clearing periods. The Recipient Operator should confirm the porting time to the customer when the Donor Operator has confirmed the scheduled port time.

Debt Management

A bill issued before the port order is placed must be settled by the customer before the number is ported. In these circumstances, it must be possible to audit the sequence of events.

Once a customer has ported their number:

- the Donor Operator shall issue a final bill to the customer;
- where the customer does not settle this final bill in full within 30 days of the date of issue of the final bill, the Recipient Operator shall suspend the customer's service to that number in a manner that can be audited;
- service to a suspended number may not be restored until the final bill is paid in full;
- if the final bill is not settled within a further 30 days the Recipient Operators shall cease service to the ported number;

Ceased Numbers

A ported number that has been 'ceased' at a customer's request or for debt management reasons shall be placed in 'quarantine' in accordance with the National Numbering Plan and returned to the Donor Operator. The 'quarantined' number must may not be issued to or used by any customer during the quarantine period. During the 'Quarantine' period the Recipient Operator's network and systems must set in such a manner that the number cannot be used by any customer.

At the end of the 'quarantine' period, the number shall be returned to the operator originally allocated the number for re-use with their customers.

Quarantine periods for these numbers shall be auditable by the competing operators.

Tariff Transparency

The operators will introduce a mechanism designed to alert customers to the fact that the call they are making is to a ported number and that the billing will be based on an off-net call tariff not an on-net call tariff, as they reasonably would have expected.

One Stop Shop Process

The operators will design a porting process around the 'one-stop-shop' concept whereby the proposed Recipient Operator manages the process (with the Donor Operator) on behalf of the customer.

For the avoidance of doubt, this means that the Donor Operator will not contact the customer during the porting process, other than relating to unpaid bills and the issue of a final bill once the

customer has ported, and will allow the Recipient Operator to handle all the necessary interactions on behalf of the customer. Communications from the Donor Operator to the customer is confined to unpaid bills and the issue of the final bill are limited to the value and composition of the bill (including resolving any queries relating to the amount); and may include methods of payment and any payment reminders and sanctions that may apply if the bill remains unpaid.

Retention/Win Back Activity

Donor Operators shall not be allowed to engage in 'retention' activity during the porting process.

For the avoidance of doubt, this means that the Donor Operator shall not contact the customer during the porting process to make any attempt to retain the customer's business or by offering a change of product or service offering to the customer in an attempt to retain their business.

Unwarranted and/or misleading communication with a porting customer causes dissatisfaction and may in certain circumstances represent anti-competitive behaviour.

Misuse of Customer Information

Operators will not use porting data or records relating to 'ported' customers for targeted marketing purposes during or after the porting process.

For the avoidance of doubt, this means that the Donor Operator will not contact a customer directly based on the knowledge that this customer has 'exported' their number to another operator.

Unwarranted and/or misleading communication with a porting customer causes dissatisfaction and may in certain circumstances represent anti-competitive behaviour.

Porting Frequency

That customers who have ported from one operator to another, should not be subject to a time-lag preventing them from porting on to a third operator, or returning to their original operator.

Mis-Selling and Slamming

The operators will adopt a code of practice regarding selling practices and ictQATAR will ensure that compliance is mandatory. The code of practice shall include the requirement for the customer to provide their account number (not the bill itself) to the Recipient Operator at the time that they request the port of their number. In the case of enterprise customers a letter of authority from the owner with copy of CR is to be provided. The provision of the account number will confirm that the customer is knowingly requesting the transfer of their service and the port of their number and no other requirements shall be included in the code of practice.

Where the customer has a 'bundle' of services with the Donor Operator, the Recipient Operator must clearly explain the scope of the new services and that the customer may need to make alternative arrangements for the supply of services not included by the Recipient Operator.

Refusing to Provide Service

The introduction of NP should not change the operators' current practice of offering, declining or ceasing service to customers.