

Submission to the Independent Communications Authority of South Africa

**On the draft Operation System Specification (OSS) for Number
Portability published in Government Gazette 42109 on 13
December 2018, Notice 1382**

A. INTRODUCTION

- 1 Telkom SA SOC Limited (“Telkom”) welcomes the opportunity to submit its written comments on the draft Operational System Specification (“OSS”) regulations of the Independent Communications Authority of South Africa (“ICASA”) published in Government Gazette 42109 of 13 December 2018, Notice 1382.
- 2 Telkom trusts the Authority will find these inputs valuable in its deliberations on these regulations.
- 3 Format of this submission
 - a. ICASA proposed regulation text
 - b. Telkom proposed new text or Telkom proposed amendment text

B. EXECUTIVE SUMMARY

Number porting was introduced by ICASA in 2005 by means of the Number Portability Regulations of 2005. Number porting allows subscribers to change their service provider/network operator while retaining their assigned number(s). In 2016 ICASA embarked on a review of the 2005 Number Portability Regulations to gauge their effectiveness. This culminated in the 2018 Number Portability Regulations, which were published in March 2018, subsequently amended and published a second time in October 2018, this time with reasons. To implement these regulations, the development of functional specification regulations and operational system specifications (OSS) for both mobile number portability (MNP) and geographic number portability (GNP) was required. The 2018 regulations included the functional specification regulations, followed by the draft OSS Regulations which were published on 13 December 2018 for comment.

The OSS defines the rules of engagement between the donor operator, recipient operator and the central reference database or CRDB (which is the master record for all ported numbers). The CRDB is managed and operated by the Number Portability Company (NPC), and the NPC's system automates and implements the OSS. The OSS defines several types of requests (port request and activation, port cancellation, port reversal, return to block operator, CRDB download and emergency notification) between the operators and between the operator and the CRDB for MNP and GNP. Beneath each of these requests lies a host of additional procedures with accompanying information requirements, progress messages for each request and valid reason codes used to indicate on what basis a port request is rejected.

The draft OSS omitted the entire set of valid reason codes associated with rejecting port requests, making a precise impact assessment of these regulations speculative. In order to make a reasonable assessment of these regulations Telkom assumed that the reasons codes defined in the NPC CRDB system document (5.0.8.2) apply.

The draft OSS fails to provide specifications for the new non-geographic number ranges i.e. 080, 086 and 087, which renders the porting of these numbers problematic. The OSS conflates system specifications for 080, 086 and 087 with technical implementation of the existing NPC system. The fact that the existing system appears to be able to accommodate the new number ranges does not equate to a system specification for each of these number ranges. The system specification fails to define specific specifications for each of the new non-geographic number ranges i.e. 080, 086 and 087 which will become subject to porting once the 2018 Number Portability Regulations are enacted. ICASA makes an assumption that the conditions associated with GNP, for which the GNP system specification was developed, apply equally to these three new number ranges, while in fact there are material differences between them which warrant distinct system specifications. A market review would have been valuable to identify issues relating to the porting of these different non-geographic number ranges and what the real consumer benefits are that could be practically be achieved. There are further quality of service issues that arise for consumers when porting fax-to-email numbers, which compromise this service. In addition to this, the three beeps requirement negatively affects the quality of service for consumers with regard to both fax-to-email and machine-to-machine services.

This draft OSS builds on the existing OSSs for GNP and MNP and the NPC system specifications, collapsing them into a single OSS and then adding Non-Geographic Number Porting (NNP) number ranges. The introduction and implementation of NNP will impact both Telkom's own systems and those of the NPC's system. Telkom's own systems will be impacted the most. The new number ranges will require Telkom system adjustments which are complex, costly and require time to implement. Presently, Telkom has no IT systems in place to accommodate NNP, and although the existing GNP NPC system appears to cater for NNP, this is by no means a forgone conclusion, in the absence of a dedicated system specifications for 080, 086 and 087.

Another major change in the latest draft OSS regulations is the removal/uncertainty surrounding the reason code “SP027”, which prohibits the simultaneous use of a single number on two separate networks for two different services. Telkom strongly recommends that reason code “SP027” be included in the final OSS regulations to avoid any routing and service delivery problems for operators. This change will impact Telkom Fixed in particular, as the sole provider of ADSL services where the same number is used to provide a POTS and ADSL service. Allowing the use of a single number for two different services on two different networks will create routing problems for both Telkom and other operators to these numbers.

Telkom's IT systems currently do not support a port request with multiple MSISDN's, which is now contemplated for mobile number porting.

Given the very limited time to assess the consequences of this highly technical draft regulation on Telkom's systems, and in the absence of the valid reason codes, Telkom's initial estimate is that implementation will require a time period of around 18 months.

Telkom has responded to the draft OSS regulations in as far as it was able to perform an assessment of the impact of same in the period allowed for comment. We are however concerned with regard to the feasibility of implementing number portability of 080 toll-free numbers, 086 numbers and 087 numbers in the absence of clear specifications in the OSS.

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1 GENERAL COMMENTS

1.1 INSUFFICIENT COMMENT PERIOD

Telkom confirms that it requested ICASA to grant it additional time to analyse the impact of the Draft OSS regulations, due to the fact that most of the period granted for comment fell over the festive season, during which Telkom employees had to take compulsory leave (21 December 2018 to 4 January 2019). Accordingly, key stakeholders were unavailable to consider and assess the impact of the draft OSS regulations on Telkom.

Telkom thus reiterates that the period afforded for comment on the draft OSS regulations was insufficient to assess the full impact of the draft OSS regulations on Telkom's systems. This and the omission of the valid reason codes from the OSS regulations has rendered this process problematic. Accordingly, Telkom provides a best effort analysis of the impact of the draft OSS regulations given the limited time granted.

1.2 CRITICAL OMISSION OF VALID REASON CODES FROM THE DRAFT OSS REGULATIONS

No valid reasons codes were provided in the draft OSS regulations. This is a critical omission from the regulations and adds to the difficulties in performing a comprehensive assessment of the impact of the regulations.

In the absence of the valid reason codes, Telkom has assumed that the prevailing reason codes used in the NPC CRDB system document (Centralised Reference Data Base – Number Porting Processes (MNP/GNP) apply.

1.3 SYSTEM SPECIFICATIONS FOR 080, 086 AND 087 ARE NOT DEFINED

ICASA has conflated the NPC system to be adopted for NNP, with the system specification for each distinct number range i.e. 080, 086 and 087. Telkom submits that the system specification must be explicit about the treatment of each number range which is subject to number portability requirements. There should be a unique system specification for 080, 086 and 087. These system specifications must take into account the uniqueness of each of these different number ranges. Notwithstanding, the implementation of this system specification for each number range may ultimately rely on and use some or all of the existing processes used by GNP, which is located within efficient system design practice. This can however not replace the need for a clear system specification which explicitly governs the protocol between operators, and between operators and the NPC system, for each number range that is subject to number portability.

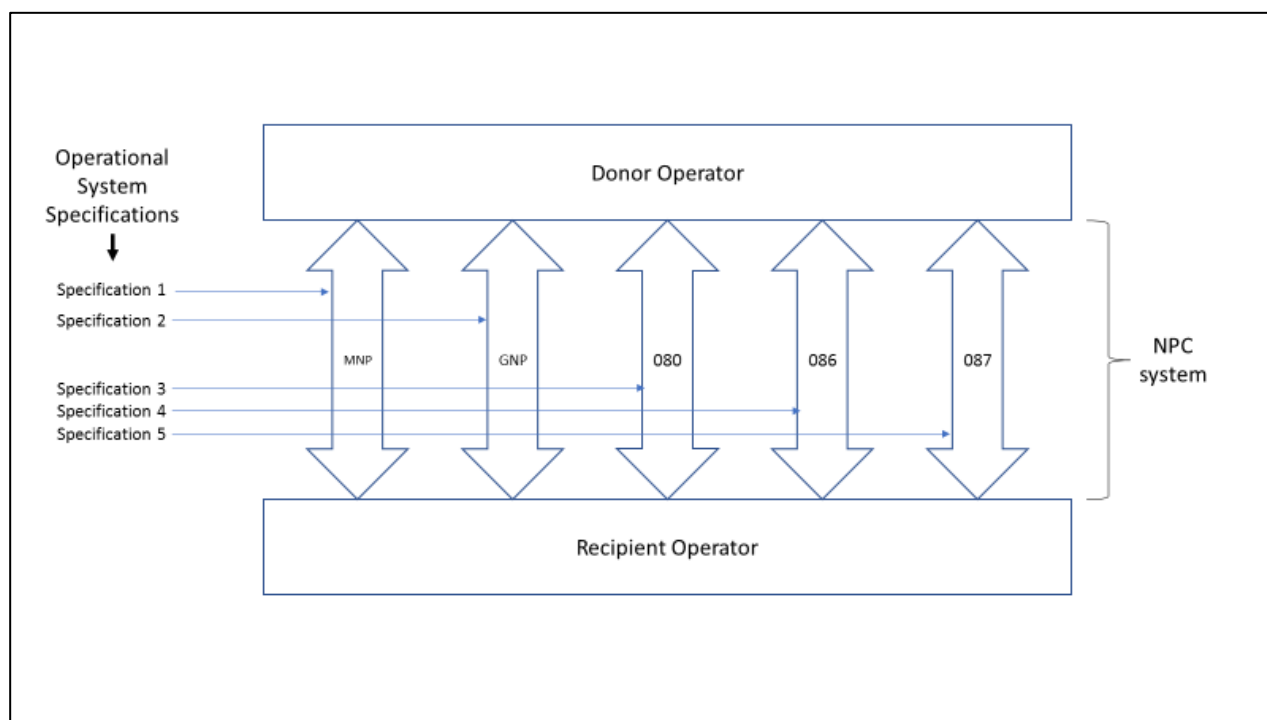


Figure 1 - System Specification Delineation for different types of number ranges

1.4 IMPLEMENTATION OF OSS REQUIRES TELKOM SYSTEMS CHANGES TIME & MONEY

The implementation of the latest draft OSS Regulations will have a major impact on Telkom IT systems and will be costly to implement, for example the implementation of NNP. Of concern is ICASA's view that the NNP number ranges can easily be accommodated by the prevailing GNP system. A quick comparison of the GNP and MNP system specifications reveals that exchanged information is not always the same. No evaluation has been done to determine whether there are differences between NNP (080, 086 & 087) number ranges and GNP number ranges, where the smallest difference warrants a distinct system specification. Telkom was unable to make a final determination in this regard in the period allowed for comment.

Telkom's initial assessment indicates that we will require approximately 18 months to properly assess the impact and implement the draft OSS Regulations where technically possible. Telkom is fully prepared to discuss the finer details with the Authority, should the Authority seek further clarification from Telkom in this regard.

1.5 PROTECT UNIQUE IDENTIFICATION OF SUBSCRIBERS BY NOT SPLITTING NUMBERS

In the light of the omission in section 12 of the GNP section of valid rejection reason codes, it is unclear which valid reason codes are applicable (or inapplicable) in the OSS. However, Telkom is particularly concerned about the uncertainty created around reason code "SP027". Telkom explains its concern below.

Firstly, Telkom is uncertain whether reason code SP027 is still included in the OSS. If not, its omission in relation to rejecting port requests is problematic. This is because the successful identification of a subscriber on any network relies on a unique number which identifies the subscriber. This unique identification of the subscriber through a unique number is a pre-requisite to ensure successful call routing and delivery of SMS messages etcetera to the subscriber/end-user.

Telkom provides both a POTS and ADSL service to subscribers on its fixed wireline access network, with both services using the same number. **It is technically impossible for Telkom to allow a port-out of the subscriber's POTS number while the same number is being used to provide the subscriber an ADSL service on Telkom's network.** This would give rise to the same number being used on Telkom and another network operator's network simultaneously, which creates a call routing problem and compromises the unique identification associated with a single subscriber. Telkom can port out the POTS number, if there is not ADSL service provisioned over the same fixed line to the subscriber.

The reason code "SP027" in the NPC system document, stemming from the prohibition on splitting a number for use on two or more networks for different services in the 2005 Number Portability Regulations, caters for the above for the above scenario, but is omitted, together with the omission of all the other valid reason codes in the draft OSS regulations.

Telkom strongly recommends that reason code "SP027" be included in the final OSS regulations to avoid any routing and service delivery problems for operators.

1.6 PROTECT THE REGULATORY NUMBERING ECO SYSTEM

ICASA has established a Regulatory Numbering framework consisting of the Numbering Plan Regulations, Number Portability Regulations and several other regulations. Telkom therefore recommends that any additional regulations take into account existing regulations and be consistent with same as applicable, in order to promote regulatory certainty.

Example:

The 2016 Numbering Plan Regulations defined the term "non-geographic number". The draft OSS regulations also define this term. This introduces ambiguity around the term "non-geographic number" by assigning two different meanings to it. Furthermore, the definition of the term in the draft OSS regulations may extend the scope of number portability beyond the envisaged new number ranges i.e. 080, 086 and 087.

1.7 BUSINESS HOURS FOR GNP

GNP is not presently supported by Telkom on a Saturday. Complying with this requirement will require additional resources and system upgrades and will take time to implement. This was one of the reasons Telkom requested an extension to respond to the draft OSS regulations.

1.8 GNP UPDATING OF LEGACY ROUTING TABLES REMAINS A CHALLENGE

Telkom has previously during ICASA's inquiry into number portability, and its submission on the draft 2017 number portability regulations, noted challenges in relation to updating its decentralised routing tables on its legacy fixed line network. Telkom remains committed to resolving this challenge, but faces budgetary and time constraints.

Telkom kindly requests the Authority to acknowledge this technical challenge which has the result that Telkom is not in a position to conform to the draft OSS in this regard. This relates to section 10(23) of the draft OSS Regulations.

1.9 CORRECT THE NUMBERING IN THE DRAFT OSS REGULATION

The numbering in the published draft OSS regulations is inconsistent and must be remedied in the final regulation.

2 SPECIFIC COMMENTS

2.1 DEFINITIONS

2.1.1 *Proposed amendments and concerns on definitions*

2.1.1.1 “business hours”

GNP is currently not supported on a Saturday by Telkom.

2.1.1.2 “central reference database”

Telkom proposes an amendment to this provision:

Existing provision:

“central reference database” means a centralised database of all geographic, non-geographic and mobile numbers and that have been ported from one operator to another operator pursuant to the regulations

Telkom proposed amendment:

“central reference database” means a centralised database of all geographic, ~~non-geographic~~ 080, 086, 087 and mobile number ranges that have been ported from one operator to another operator pursuant to the regulations

Reason for amendment:

The term “non-geographic number” include numerous other number ranges which should not be subject to porting: see Table 4 in the 2016 Numbering Plan Regulations for the list of number ranges which are now inadvertently subject to porting. Only geographic, 080, 086, 087 and mobile numbers are now contemplated by ICASA to be subject to porting.

2.1.1.3 “connected parties”

Telkom proposes an amendment to this provision:

Existing provision:

“connected parties” means all entities that are connected to, or interface with, the central reference database.

Telkom proposed amendment:

“connected parties” means all ~~entities~~ electronic communications service (ECS) licensees and third parties / agents acting on behalf of ECS licensees that are connected to, or interface with, the central reference database.

Reason for amendment:

The definition of “number portability” in the ECA contemplates that number portability occurs between ECS licensees. In addition, an ECS licence allows the licensee to appoint third parties in the form of agents or contractors (a.k.a. as service providers), who may be granted access to the NPC system to access the central reference database.

2.1.1.4 “GNP and NNP NST”

Include “GNP” and “NNP” as part of the respective definitions.

Telkom requests that the NST for GNP period be kept at 17h00 – 18h00.

2.1.1.5 “non-geographic number”

This term is already defined in the 2016 Numbering Plan Regulations. Telkom recommends using a different unique term that does not overlap with the existing definition of “non-geographic number” found in the 2016 Numbering Plan Regulations to identify 080, 086 and 087 number ranges.

2.1.1.6 “Non-geographic Number Portability”

Telkom recommends using a different term for this type of porting. See Telkom comment on definition of “non-geographic number”.

2.1.1.7 “ordering system specification”

Telkom proposes an amendment to this provision:

Existing provision:

“ordering system specification” means a specification of the procedures by which a recipient operator and a donor operator exchange information between each other to provide number portability to a subscriber, including the information to be sent, the format of the information, the means of communication, the times when communications may be sent, the time limits for responses and the handling of error conditions

Telkom proposed amendment:

“ordering system specification” means a specification of the procedures by which a recipient operator and a donor operator exchange information between each other to provide number portability to a subscriber, including the information to be sent, the format of the information, the means of communication, the times when communications may be sent, the time limits for responses and the handling of error conditions, which govern the updating of the CRDB.

Reason for amendment:

The OSS does not only deal with the rules governing the interaction between the operators, but also with the rules which are applied to update the CRDB, such as setting timer parameters for updating the CRDB. The very purpose of the OSS is to govern all processes between operators related to porting including the rules which apply to the updating of the CRDB.

2.1.2 Add definition for “Number Portability Company” (“NPC”)

- “Number Portability Company” or “NPC” means the company responsible for managing the system which updates the Central Reference Database (CRDB) for all ported numbers as defined in the OSS.

Section 3 - Purpose of the Regulations

2.2 SECTION 3(1) & 3(2)

The OSS regulations should clearly set out the roles and responsibilities of all players involved in the number porting process for all the different number ranges which are subject to porting. These role players are the recipient operator, the appointed service provider, donor operator and the NPC who manages the Central Reference Database as required by the OSS. The OSS defines processes that include the three parties involved in a port, namely the recipient operator, donor operator and the NPC. The NPC has however been omitted from these regulations. The NPC should be included in this section to ensure that all operators are aware of and connected to the NPC system which implements the OSS, to ensure that third party routing is transparent to all operators. For clarity, “third party routing” refers to porting between two operators which needs to be transparent to all other parties to ensure successful routing to those ported numbers.

Section 4 - Scope and application of the regulations

2.2.1 Section 4(1)(b)

The scope of this is wider than envisaged and must be narrowed. See Telkom's comment on the definition of "Non-Geographic Number Portability"

Section 6 - Obligation of persons bound by these regulations

2.3 SECTION 6(1)(B)

Telkom proposes an amendment to this provision:

Existing provision:

"lodge port requests with donor operators on their subscribers' behalf;"

Telkom proposed amendment:

"lodge port requests with donor operators via the NPC system on their subscribers' behalf, with the exception of managed ports which are initially handled on a manual basis;"

Reason for amendment:

The interface between the recipient and donor operator occurs via the NPC's system which implements the OSS, and updates the CRDB according the OSS rules.

2.4 SECTION 6(1)(F)

Existing provision:

"return numbers to the Block Operator when service is ceased on such numbers on the same day"

Telkom proposed amendment:

"return numbers to the Block Operator within 24 hours from the moment the service is ceased on the other network"

Reason for amendment:

It provides a more precise, measurable and fair means against which to assess whether the requirement re the return of the number has been complied with.

Add additional return to block operator request process

In addition, Telkom requests the introduction of an additional process in the OSS in terms of which a block operator can request the return of a number(s) that belongs to its blocks, where the recipient operator has failed to return the number to the block operator.

Reason for request:

This request stems from instances whereby numbers have not been returned by a recipient operator as is required in the OSS processes, but there is no official mechanism through which a block operator can request the return of the number(s) that belongs to its number blocks. A formal request process, whereby a block operator can make a formal request for the return of such number(s) from the recipient operator, will ensure that these numbers can be returned to the block operator and that routing always gravitates towards efficient levels by preserving number blocks. Telkom recommends that these numbers should be returned by the recipient operator within 24-hours from the block operator logging the return request.

NB:

This regulation will require Telkom IT system changes which will be costly and will require time. Due to the tight timelines given for this submission, Telkom's initial high-level estimate is that it

would require an 18 month period to effect this change, due to the costly nature of this upgrade and system complexity associated with its implementation.

2.5 SECTION 6(3)(A)

This regulation refers to the Functional Specification in the 2018 Number Portability Regulations, but there are no conditions or obligations found in the Functional Specification which obligate the block operator to take back ported numbers. It needs to be more circumspect to bring clarity on what obligation is placed on the block operator in this context. Please see inputs provided in Section 6(1)(f).

2.6 SECTION 6(6)

Licensed operators (connected parties) who exit the market create a problem on the NPC system when it comes to block ownership, as these operators are still recorded as being the original block owner on the NPC system. This leads to routing problems and the circumvention of number portability processes, and frustrates porting attempts when the licensee no longer exists to perform the porting responsibilities. It is unclear what should happen to their allocated block numbers.

This scenario must be addressed by ICASA so that routing can still be maintained and customers not be prejudiced.

2.7 SECTION 6(7)

The use of the CRDB is incorrect in the context of this specific regulation. The CRDB should not be referenced anywhere in this regulation 6, but should rather be referenced as being managed by the NPC. NPC is entrusted with the management of the CRDB, and they should be tasked to do these activities listed under section 6(7).

2.8 SECTION 6(7)(F)

A distinction should be drawn between the CRDB and the NPC. The CRDB is merely a database which keeps record of all ported numbers, whereas the functions listed under 6(7)(f) refer to the processes between the recipient and the donor operator which the NPC administers as part of the rules which inform when and how the CRDB will be updated. Therefore, the correct reference should be to the NPC and not the CRDB. The CRDB does not perform these functions, but they are administered by the NPC as part of the OSS rules which informs when and how the CRDB is updated.

Section 7 – Porting Process

2.9 SECTION 7(2)

Telkom requests the Authority to acknowledge and provision for the ‘network freeze period’ implemented by most, if not all, GNP operators during the festive period on their networks, during which no changes are effected. During this period GNP ports generally cannot be handled due to the operator’s personnel being unavailable to attend to porting requests. The demand for GNP porting also drops dramatically during this period. The “network freeze period” typically runs from about 22 December to 4 January the next year.

2.10 SECTION 7(3)

The NST for GNP and MNP remain unchanged, but NNP should also be broken down and explicitly defined added number range.

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- For GNP NST time is 17H00 to 18H00.
 - For MNP NST time is 19h30 to 22h00.
 - For NNP NST - break down for each number range

Sundays and public holidays must be added to the list of exclusions.

Please see comment under 2.1.1.4 above.

2.11 SECTION 7(8)(A)

The Authority should build in a mechanism to protect and guard against fragmenting number blocks, especially when a 1 month prohibition to port back/out is placed on a subscriber. The CRDB should also protect number blocks from fragmenting.

2.12 SECTION 7(11)(A)

Telkom proposes an amendment to this provision:

Existing provision:

"Where the recipient operator de-activates a ported number on its network, the recipient operator must return the ported number to the block operator."

Telkom proposed amendment:

"Where the recipient operator de-activates a ported number or number block on its network, the recipient operator must return the ported number to the block operator."

Reason for amendment:

The deactivation could be in respect of a single number or a number block.

Section A – Geographic and non-geographic portability

2.13 SECTION 10(1)

Telkom's initial assessment is that 080, 086 and 087 numbers should only be subject to an individual porting process, and not a managed porting process, to avoid ambiguity.

There is ambiguity in this provision w.r.t. managed porting process, and it is unclear what this process entails? It is not clear whether 080, 086 and 087 port requests should perhaps be grouped together under a managed port? Telkom submits that if the OSS clearly defines the system processes for 080, 086 and 087 porting as noted earlier, each port request will follow the individual port process, and ambiguity will be removed as to what this regulation requires.

Telkom notes that ISDN PRIs and SIP PBX Trunks, if ported, will reside under 'managed porting' while the Access Code and Service Subscriber Number will reside under the 'individual porting process'.

Telkom has continuously emphasised the need for the Authority to clarify how 087 number porting has to be accommodated. It did this in the initial inquiry into Number Portability, the 2016 draft Number Portability Regulations, and the informal consultation with ICASA in preparation for the publication of the current draft OSS Regulations. Likewise, Telkom has continuously argued the need for a market review to be undertaken by the Authority to determine the demand for porting of 080, 086 and 087 number ranges. Telkom continues to advocate this to be an essential requirement which will address the questions raised by Telkom about how number porting of these number ranges should work.

2.14 SECTION 10(2)

Telkom proposes an amendment to this provision:

Existing Text:

“The managed process shall be used to port a block of list of single numbers or a single range of numbers where the individual process has not been requested.”

Telkom proposed amendment:

“The managed process shall be used to port a sequential block of list of single numbers or a single range of numbers where the individual process has not been requested.”

Reason for amendment:

This regulation should make it clear what type of porting process will be applied in order to avoid any unnecessary delays caused by disputes between the involved parties. The default position that should apply for porting should be the individual porting process, unless the conditions for a managed porting process are met i.e. when porting a sequential block of numbers. No list of random numbers must be allowed under a managed port. It must be clearly defined under what conditions a managed process will apply. The default position for porting should be the individual port process, unless the criteria is met for a managed port process. It should be clearly stipulated in the OSS under what conditions each port process will apply. The agreement between parties should be minimal due to the clear requirements of the OSS.

2.15 SECTION 10(18)

Telkom is concerned about the period within which it needs to respond to a port out request, especially where this requires a managed process where physical travelling and manual configuration to the subscriber’s premises is required to decommission the service.

2.16 SECTION 10(23)

Telkom is not in a position to comply with s10(23) of the draft OSS regs due to technical challenges, where manual updating of routing tables must still be applied on its legacy fixed line network. The percentage of numbers affected by this problem are small, and Telkom does handle such instances with other operators on an expedited basis, but call routing challenges will continue to occur because of these manual update processes.

The issue surrounding router table updates is still subject to Telkom’s own financial constraints and priorities.

2.17 SECTION 12

The draft OSS regulations contain a section titled “Valid Reasons Codes”, but no valid reason codes are provided, making a proper response to these proposed regulations a challenge.

Telkom has based its submission on the existing Centralised Reference Data Base (CRDB) Number Porting Processes (MNP/GNP) Release 5.0.8.2, which contains reason codes.

Section B – Mobile Number Portability

Managed Process for MNP has been omitted from this OSS, but the Number Portability Regulations clearly require it to be introduced. The Authority must address this omission.

2.18 SECTION 11(1 TO 6)

This regulation has a default position that if a subscriber does not respond within the 4 hour period, that they port-out request will be rejected, which may have negative consequences for operators. Telkom wishes to stress that these times should not be considered as target times, but as maximum allowable times. Operators should be regulated by introducing the wording “without delay” on all the respective regulations as indicated in the table below. Should operators fail to achieve efficient performance on these regulations, the Authority may seek to impose penalties should it be discovered that donor operators are deliberately delaying the port out process.

	2005 Number Portability Regulations	2018 Number Portability Regulations	Telkom Position
Default position on no reply from subscriber	Port out	No port out	Supported, subject to additional condition – without delay
Donor port validation	None	Included in Functional Specification Regulations	Supported
OTP	None	Included in Functional Specification Regulations	Supported
OTP duration	None (unofficially - 1 hour)	4 hours	Supported, subject to additional conditions – without delay
Charge for OTP	None	No charge	supported
OTP Message	None	“(Donor operator name) has received a request from (Recipient operator name) to port this number: (subscriber number). If this information is correct, please send the following OTP: xxxxx. This OTP is valid for 4 hours, after which failure to respond to this message, shall result with the port request being rejected”	supported
Time capped port out process	None	Once the port out request has been confirmed by the subscriber to the donor, the port out process may not take more than 7 hours.	Supported, subject to additional conditions – without delay

2.19 SECTION 11(5)

This regulation contradicts regulation 7(8)(a) and should be aligned with regulation 7(8)(a).

2.20 SECTION 11(7)

Routing remains a concern. Currently, Telkom cannot guarantee that a subscriber can always make or receive calls as third party operators do not always update the CRDB with their ported number changes.

2.21 SECTION 11(14)(6) TO 11(14)(8(4)

Telkom's IT systems currently do not support a port request with multiple MSISDN's. There are no IT support services provided for NNP at present, and these will need to be established.

END OF REPORT