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Vodacom's written submission in response to ICASA's draft Order System Specification for Number Portability

[Government Gazette Number: 42109, Notice Number 1382 of 13 December 2018]

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1   INTRODUCTION

Vodacom (Pty) Ltd ("Vodacom") welcomes the opportunity to make a written representation on the "Draft Ordering System Specification for Number Portability" ("the draft OSS"), as published by ICASA ("the Authority") in Government Gazette No. 42109, Notice Number 1382 of 13 December 2018.

Vodacom commends the Authority on completing the draft OSS for Number Portability. This represents a significant milestone towards implementing the Number Portability Regulations ("2018 Number Portability Regulations") published under Government Notice 1021 in Government Gazette Number 41949 on 1 October 2018.

Vodacom's submission is comprised of two parts:

- Part A: Vodacom's response in principle to the draft OSS;
- Part B: Vodacom's specific comments on the draft OSS.

Where Vodacom proposes alternative text, additions are <u>underlined</u> and deletions are ~~struck-through~~.

2   Part A: In Principle Comments

Vodacom congratulates the Authority on completing the Draft OSS as the first step towards putting in place the clear and unambiguous specifications that are required for all operators and the Number Portability Company ("NPC") to change their systems as required for the industry as a whole to comply with the 2018 Number Portability Regulations.

It is important that:

- The specifications be consistent, clear and complete to ensure that Number Portability ecosystem retains interoperability after each stakeholder has made changes to their individual processes and systems.
- The OSS must give effect to the 2018 Number Portability Regulations[1]. Therefore, the OSS must be consistent with the 2018 Number Portability Regulations.

Vodacom's comments on the draft OSS seek to:

1. Identify contradictions and ambiguity in the specifications and propose alternatives that comply with the new Number Portability Regulations;
2. Identify gaps in the specifications and propose how these gaps can be filled to comply with the new Number Portability Regulations; and

Vodacom acknowledges that the finalization of the Order System Specification will require a collective effort by operators and the Authority. Vodacom trusts that the Authority will find its comments a constructive contribution towards settling the OSS so that South Africans can enjoy the better protection against fraudulent porting and more competition in the services linked to non-geographic numbers as soon as possible.

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[1] 2018 Number Portability Regulations published under Government Notice 1021 in Government Gazette Number 41949 on 1 October 2018

3 Part B: Specific Comments

While, Vodacom does not comment on the numbering of the OSS regulations/specifications. However, Vodacom recommends that the Authority review the numbering of regulations/specifications and sub-regulations/sub-specifications to improve clarity and consistency.

Vodacom's specific comments on the draft OSS are organised in three parts:

1. Vodacom's comments dealing with aspects of the OSS that do not specify to the class of number (that is Mobile, Geographic, and Non-geographic) being ported;
2. Vodacom's comments on Section A dealing with Geographic and Non-geographic number portability; and
3. Vodacom's comments on Section B dealing with Mobile Number Portability.

3.1 Comments on regulations that relate to the OSS in general

3.1.1 Regarding Definitions

GNP and NNP NST

It is not clear why the definition of "GNP and NNP NST" is included. Vodacom proposes removing this text from the list of definitions.

> "~~GNP and NNP NST means 17h00 – 18h00;~~"

To the extent that Network Synchronisation Time ("NST") differs between Mobile Number Portability ("MNP") and Geographic and Non-Geographic Number Portability ("GNP and NNP"), Vodacom suggests moving this text in Section A of the OSS.

The Definition of Managed Process

Vodacom proposes that the scope of the definition of "managed process" be extended to include non-geographic numbers. Vodacom proposes the following change to the text of the draft OSS.

> **"managed process"** means the processes leading up to, and the simultaneous physical porting of one single number range or groups (list) of individual geographic <u>or non-geographic</u> numbers that are of sufficient complexity to require the development of a customized porting process;

3.1.2 Regulation 7 Porting Process

The regulation on the porting process appears to relate primarily to Mobile Number Portability ("MNP") and not to Geographic Number Portability ("GNP") or Non-geographic Number Portability ("NNP"). For the sake of clarity, the regulation should be explicit about its scope.

To the extent that the regulation pertains primarily to MNP, Vodacom proposes that it should be moved to Section B of the OSS. If the regulation pertains primarily to GNP and NNP it should be moved to Section A of the OSS.

Sub- Regulation 7(2): Sundays and Public Holidays

> *"The Port Request and Activation, Port Cancellation, Port Reversal and*
> *Return to Block Operator processes will not be handled on the following*
> *days:*
> *(a) Sundays; and*
> *(b) Public Holidays."*

Vodacom assumes this regulation relates to MNP. The NPC is able to process MNP Activations, Cancellations and Reversals on Sundays and Public Holidays.

Furthermore, unnecessary delays in MNP activations, cancelations are not in the public interest. On the one hand legitimate port activations should not be delayed if the process is automated. On the other hand, systematic restrictions on the timing of port cancelations and port reversals create a dangerous window of opportunity for the perpetrators of porting fraud.

Vodacom proposes that the text be amended as follows:

> *"The Port Request ~~and Activation, Port Cancellation, Port Reversal~~ and*
> *Return to Block Operator processes will not be handled on the following*
> *days:*
> *(a) Sundays; and*
> *(b) Public Holidays."*

Sub- Regulation 7(3): Activation and de-activation of network and updating of routing tables

> *"Activation and deactivation on the network and updating of routing tables shall only take place during Network Synchronisation Time (19h30 – 22h00) on all days except Public Holidays. Activation and deactivation on the network and updating of routing tables due to a Port Reversal process can also take place during normal Business Hours."*

Vodacom notes that the Network Synchronisation Time ("NST") for MNP is from 19h30 to 22h00, while the NST for GNP and NNP appears to be from 17h00 to 18h00.

Sub- Regulation 7(5): The rejection of messages during NST

> *"Messages pertaining to activation, deactivation and the update of routing tables will be handled during Network Synchronisation Time. All other Messages will be rejected by the CRDB during the Network*

> *Synchronisation Time with an error Message. Such Messages should be resubmitted during Business Hours. Messages indicating a successful deactivation and update of routing tables will also be handled after Network Synchronisation Time."*

Vodacom draws the Authority's attention to the fact that MNP messages received during NST are currently queued and not rejected.

Vodacom proposes the following change to the text of the draft OSS.

> *"Messages pertaining to activation, deactivation and the update of routing tables will be handled during Network Synchronisation Time. All other Messages will be ~~rejected~~ queued by the CRDB during the Network Synchronisation Time ~~with an error Message~~. Such Messages should be resubmitted during Business Hours. Messages indicating a successful deactivation and update of routing tables will also be handled after Network Synchronisation Time."*

Sub- Regulation 7(8): Port Request and Activation

> *"(a) Subscribers are not allowed to port again within one (1) month of a successful port, measured from the Porting Time. After one (1) month has lapsed, a new port can be requested, and a new Port Request and Activation process can be invoked."*

Vodacom requests that the Authority provide clarity on the treatment of port reversals in cases of fraudulent ports. Vodacom proposes the following change to the text of the draft OSS.

> *"(a) Except in the case of port reversal, Subscribers are not allowed to port again within one (1) month of a successful port, measured from the Porting Time. After one (1) month has lapsed, a new port can be requested, and a new Port Request and Activation process can be invoked."*

Sub- Regulation 7(10): Port Reversals

> *"(c) Donor Operator must accept the entire reversal request."*
>
> *"(f) Only a full reversal activation is allowed, i.e. all the numbers requested in the Reversal Request must be activated."*

From time to time bulk porting requests for mobile numbers contain errors. Vodacom's current practice is to cancel or reverse port requests that have been identified as errors. Vodacom submits that to the extent that partial port reversals are supported by the NPC, these transactions should be allowed as they are in the interest of the public.

3.2   Comments on 10 Section A: GNP and NNP

Sub-regulation 10 (35) Number return request

The 2018 Number Portability Regulations prescribe a quarantine period of one month.

> *"The donor operator must upon receipt of the number/number block contemplated in sub-regulation (3) quarantine the number/number block for at least one (1) month."*
> - Regulation 9 (7) of the 2018 Number Portability Regulations

Vodacom proposes that the quarantine period be amended to be consistent with the 2018 Number Portability Regulations.

> *"(d)Time constraints*
> *As soon as possible after deactivation of the number(s) on the recipient operator's network, but in any event by no later than the end of the day after such deactivation. The Block Operator will quarantine the numbers for a* ~~*three (3)-month*~~ <u>*one (1) month*</u> *period."*

3.2.1   Regulation 12: Valid Reason Codes

The draft OSS does not enumerate specific reason codes. Vodacom proposes that the OSS should specify the reason codes explicitly. The list or reason codes should include all the port rejection grounds in Specification 5 of the Functional System Specification in the 2018 Number Portability Regulations.

A reason code for failed OTP Validation should be included in the list of reason codes.

3.3   Comments on 11 Section B: MNP

3.3.1   Sub-regulation 11 (17) Return to Block Operator Process

> *"(5) The Block Operator will not quarantine the MSISDN for the Quarantine Time before the MSISDN can be re-issued. The Return to Block Operator Process is invoked by the last Recipient Network Operator to return the previously ported MSISDN to the Block Operator i.e. the operator holding the block of MSISDNs wherein the ported MSISDN belongs."*

Contradicts the Regulation 9(7) of the 2018 Number Portability Regulations. Vodacom proposes that the quarantine period be amended to be consistent with the 2018 Number Portability Regulations.

"(5) The Block Operator will ~~not~~ quarantine the MSISDN <u>for one (1) month</u> before the MSISDN can be re-issued. The Return to Block Operator Process is invoked by the last Recipient Network Operator to return the previously ported MSISDN to the Block Operator i.e. the operator holding the block of MSISDNs wherein the ported MSISDN belongs."

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