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Sent: Quarta-feira, 15 de Março de 2000 12:15
To: 'portabilidade@icp.pt'
Subject: Consulta Publica sobre Portabilidade do Número

Ladies and Gentlemen,

On behalf of Ericsson Telecomunicacoes, Lda. I am pleased to forward our comments regarding the "Consulta Pública sobre Portabilidade do Número".

We have studied the document carefully and have also reviewed some of the information available to us regarding experiences gained with the introduction of Number Portability in other European markets and have included this in the answers given below.

Ericsson supports the view that Number Portability is an important element in further supporting the competitiveness of the market of telecommunication services. As such, care must be taken to introduce NP in a way that this objective is fulfilled and that as few as possible residual hurdles to unlimited competition remain. Therefore, while strongly suggesting that Number Portability should be introduced based on the most advanced technical approach - we suggest a full IN solution with a central database to be operated by and independent institution like ICP while interim solutions may be required - it is not necessarily the role of a Regulatory Body to provide rulings on technical solutions to be adopted. Clear, fair, and unequivocal rules for NP are important whereas the technical solutions may be left to agreements on the implementation between the involved parties. The latter may furthermore depend on the set of rules established for NP.

Regarding the detailed questions, please read our answers below:

Question 1: It is our view that NP shall be introduced as early as possible, i.e. by January 1, 2001.

Question 2: It appears reasonable to introduce NP for all fixed network services at the same time (including non geographical services).

Question 3: NP for mobile services shall be introduced as early as possible but should not delay the process for introduction of NP for fixed network services. NP for mobile services should be introduced in accordance with the respective agreements on EU level.

Question 4: There should be no delay between the availability of a service and the availability of NP. Service Providers should assume responsibility to ensure that technical obstacles shall be removed ahead of time to avoid difficulties in providing NP that may negatively the end-user to take advantage of his freedom of choice.

Question 5: In view of the comments given above, the most important issue is to provide a clear set of rules rather than defining a technical solution. However, it appears important that the most advanced approach available will be adopted. When considering the time for implementation, it needs to be observed that operational routines and processes between the involved parties take considerable time to be prepared in addition to providing the technical solution.

Question 6: Yes, if possible there should be only one solution for all operators.

Question 7: Intermediate solutions may be necessary, but should be avoided, if possible. The respective decision should be left to the concerned parties, as long as the availability of the NP service is not compromised. Regarding point 2 of the question, we believe that this may not be necessary.

Question 8: As above, an independent organisation should operate the respective database.
Question 9 and 10: Costs for implementation have to be carried by each party. Administrative costs appear to be low as compared to the discontinuation of service and the registration of new users. Operational costs, as well as administrative costs shall therefore be borne by the operators for their respective parts and additional charging between the different parties shall be avoided as much as possible to reduce the number of resulting operational routines. It is

important that costs carried by end-users who want their numbers to be ported shall be at a level that is low enough not to discourage the use of the service.

We do hope that our answers provided above will be considered helpful in the process of establishing a set of clear rules for NP.

Sincerely yours,
Hans-Erhard Reiter
Ericsson Telecomunicacoes, Lda.