



**Submission to ICASA on the
Authority's Intention to make Numbering Plan Regulations
As published in Notice 546 of 2010 in Government Gazette 33269 dated 4
June 2010**

Submission Date: 26 July 2010

SECTION 1 - INTRODUCTION

1. The Authority has issued a *Notice of Intention to make Numbering Plan Regulations in terms of the Electronic Communications Act, Act No. 36 of 2005*, as published in Notice 546 in Government Gazette 33269 of 4 June 2010.
2. Neotel welcomes the publication of the Draft Regulations and the Authority's invitation for written submissions from interested parties. We wish to compliment the Authority, not only for the effort and time bestowed on drawing up the Draft Regulations and the associated Explanatory Document, but also for the excellence of the documents.
3. Neotel welcomes the approach by the Authority to address both the absence of an effective short code strategy and the looming shortage of numbers on all fronts, considering that no time should be lost in making due provision for sufficient numbers in order to avert the consequences of number shortages.
4. With regard to the short code proposals in the draft Regulations we wish to state that Neotel has very few short codes in operation and will therefore be able adapt to any new Short code scheme in a relatively short time period.
5. We sincerely appreciate the Authority's clear intention to come to the fore with a customer-, operator- and Authority-friendly numbering plan approach, which bodes to serve South Africa well for years to come. In this context we are keen to add enhancements to the Authority's proposed plan by presenting certain refinements and proposals as will be dealt with hereinafter.
6. Neotel thanks the Authority for the opportunity to make this submission and is willing to provide any further information or assistance the Department may require.

SECTION 2 - STRUCTURE OF THIS SUBMISSION

1. **Terminology** that will be used in this submission:
 - ***Draft Numbering Plan*** means the Authority's draft numbering plan and related regulations, as published in Government Gazette No 33269 of 2010 and which forms the subject of this submission;
 - ***Existing Numbering Plan*** means the current numbering plan as published in Government Gazette No 28039 of 2005; and
 - ***Neotel Version Numbering Plan*** means Neotel's enhanced numbering plan derived from the *Draft Numbering Plan*.
2. **Section 3: Neotel's Enhanced Numbering Plan Proposal** (also referred to as the ***Neotel Version Numbering Plan***) presents Neotel's rationale, proposals and "Outline of the completed scheme during the migration period (e.g. two years)" on page 5/14.
3. **Section 4: General Comments on the Draft Numbering Regulations** contains Specific Responses and Comments on the *Draft Numbering Plan* and the associated *Numbering Plan Regulations*. Where necessary references will be made to the specific nature of numbers and codes associated with the three types of Numbering Plans mentioned above in Item 1 of this Section.
4. **Section 5: Specific Responses to the Draft Numbering Plan Regulation** contains comment and recommendations on specific regulations.

SECTION 3 - NEOTEL'S ENHANCED NUMBERING PLAN PROPOSAL

The *Draft Numbering Plan Regulation* proposes the instantaneous migration of services out of the '0' range to alternative prefixes (effectively adding one significant digit to all numbers in South Africa) at ZAP3. In principle, this final numbering scheme is acceptable, albeit very confusing to ordinary South Africans. However, the change to this wholly new paradigm will be implemented for only a small part of the total numbering scheme at ZAP2, creating an extremely confusing, non-standard and unnecessary hybrid scheme with two conflicting paradigms for dialling South African numbers internationally, and two different number lengths, depending on when the number was issued.

In principle, Neotel agrees that it is essential to add this additional significant digit to expand the range of available numbers. However, we suggest that by considering minor variations to this approach, a much better solution will be possible, creating a win-win situation for operators and consumers. Not only is seamless migration possible, but the old and new numbering schemes can be run concurrently for an extended period (say two years).

Permanent retention of National Dialling Code '0'

Neotel very, very strongly recommends the retention of the '0' prefix for calls dialled within South Africa, as has been done in other jurisdictions, such as the United Kingdom, since removing it would require re-educating 50 million users, and announcing a fundamental change of paradigm to 200 countries.

Neotel proposes that the final, long-term closed numbering scheme be prefixed by a National Dialling Code '0' for all calls made within South Africa to national destinations within South Africa, and that this '0' be replaced with '+27' for calls made to national destinations from outside the country. Similarly, for international outgoing calls, where the CLI is forwarded, the CLI should be forwarded by replacing the leading '0' by '+27'.

When the new ranges ('2' to '9') are opened, they must be preceded by a National Dialling Code '0' for calls made within the country, to be replaced by '+27' for calls made from outside the country. This will effectively remove the '0' range as a future migration destination, reducing the total available numbers by one range, but retaining all of the strengths of the closed scheme.

The advantage of the proposed change in the first phase is that no communication will be needed internationally when the scheme is closed, since there will be no change in the dialling pattern for all incoming international calls.

The advantages of the proposed change are: consumer understanding (all national destination numbers continue to start with '0'); and the international communication of any code changes will effectively be the same as the national communication, since there will be no change in the paradigm of dropping the '0'.

Whilst it is recognised that the dialled length of numbers inside South Africa will be eleven digits, the initial '0' is simply a code of no numerical significance. The effective length of numbers remains ten digits (following the '+27', when dialled globally).

Seamless migration over an extended period (say two years)

What is absent from the proposed scheme in the draft Numbering Plan Regulations is a migration period. Two instantaneous changes are proposed (ZAP2 and ZAP3), despite the fact that the plan is perfectly suited to an extended, managed migration period. Whilst the draft Regulation has identified the digits '6', '8' and '9' as the optimum destination ranges for existing numbers, it has failed to realise that the use of these codes is the key to creating a completely seamless migration. As shown below, it is possible to create a complete overlay of the new numbering scheme, by careful choice of these new codes, so that every number can be dialled on both the old (9 significant digit) and the new (10 significant digit) scheme during the migration period. Not only will this will allow consumers and businesses a lengthy period during which to announce their new numbers, but will allow anyone to determine the new number very simply if they know the old number.

The migration needs to be simple to understand, as follows:

- Migrate all geographic numbers to the (0)6 range
 - Message to consumers: “Add a ‘6’ to all fixed line numbers”
- Migrate all mobile numbers to the (0)9 range
 - Message to consumers: “Add a ‘9’ to all mobile numbers”
- Migrate all GVAS / VoIP numbers to the (0)8 range
 - Message to consumers: “Add an ‘8’ to all 080, 086, 087, 088 & 089 numbers”

It is hence possible to run the ENTIRE new numbering scheme transparently in parallel with the existing numbering scheme for any period (say two years) that is convenient to minimise impact on consumers. Since the two schemes operate transparently side-by-side, the date at which consumers are advised of the change can be chosen jointly at the convenience of all players in the industry. (Refer to the asterisks (*) in the Table on page 6/17 as there are two minor noted anomalies to be dealt with up front).

The first significant digit in the new closed numbering scheme will therefore be as follows:

- +27 0 Not to be used, since this clashes with the national & international dialling codes
- +27 1 1 to be used for Short Codes (possibly barred from international sources)
- +27 2 Reserved
- +27 3 3 to be used for Short Code VAS (possibly barred from international sources)
- +27 4 4 to be used for Short Code VAS (possibly barred from international sources)
- +27 5 Reserved
- +27 6 Geographic (“Lower band”)
- +27 7 Reserved
- +27 8 GVAS, VoIP (“Lower band”)
- +27 9 Mobile (“Higher band”), Premium Rate, Machine Generated

Migration:

- ALL geographic codes move to (0)6 e.g. 011 becomes 0611 (+27 611 international)
- ALL mobile codes move to (0)9 e.g. 083 becomes 0983 (+27 983 international)
- ALL GVAS, VoIP move to (0)8 e.g. 086 becomes 0886 (+27 886 international)

All of the above changes should be announced simultaneously, to minimise consumer confusion, but must be followed by an extended period (say two years) during which both the existing and the new number can be dialled for the same destination.

Note that the above scheme can be thought of as aligning with “ZAP2” and “ZAP3”, but these concepts become a great deal simpler, both for the Authority and for consumers:

- ZAP2: Introduce the new numbering scheme as an overlay;
- ZAP3: Withdraw the old numbering scheme, leaving only the new scheme.

Outline of the completed Scheme during the Migration Period (e.g. two years)

Code	Existing	Int. Existing	New	Int. New	Notes	Immediate
Geographic:			6			
01	01	+27 1			Geographic for migration period, then blocked (short codes)	
02	02	+27 2			Geographic for migration period, then free	
03	03	+27 3			Geographic for migration period, then blocked (short codes)	
04	04	+27 4			Geographic for migration period, then blocked (short codes)	
05	05	+27 5			Geographic for migration period, then free	
060			060	+27 60	Available for new geographic codes	100 million
061	01	+27 1	061	+27 61	Geographic	
062	02	+27 2	062	+27 62	Geographic	
063	03	+27 3	063	+27 63	Geographic	
064	04	+27 4	064	+27 64	Geographic	
065	05	+27 5	065	+27 65	Geographic	
066			066	+27 66	Available for new geographic codes	100 million
067			067	+27 67	Available for new geographic codes	100 million
068			068	+27 68	Available for new geographic codes	100 million
069			069	+27 69	Available for new geographic codes	100 million
Old Mobile:			7			
07	07	+27 7			Mobile for migration period, then free	
GVAS / VoIP / Old Premium Rate:			8			
080	080	N/A	080	N/A	On-Net Toll-Free for migration period, then True Toll-Free	
081			081	+27 81	Available for new GVAS codes	100 million
082	082	+27 82			Mobile for migration period, then free	
083	083	+27 83			Mobile for migration period, then free	
084	084	+27 84			Mobile for migration period, then free	
085	085	+27 85			(Mobile) for migration period, then free	
086	086	+27 86			GVAS / Premium Rate for migration period, then free	
087	087	+27 87			VoIP for migration period, then free	
0880	080	N/A	0880	+27 880	* On-Net Toll-Free (Overlap - remove Paging in 0880)	
0881	0881	+27 881			Paging for migration period, then free	
0882			0882	+27 882	Available for new codes	10 million
0883			0883	+27 883	Available for new codes	10 million
0884			0884	+27 884	Available for new codes	10 million
0885			0885	+27 885	Available for new codes	10 million
0886	086	N/A	0886	+27 886	* GVAS / Premium Rate (Overlap - remove Mobile 0886)	
0887	087	+27 87	0887	+27 887	VoIP	
0888	088	+27 88			Paging for migration period, then free	
0889	089	N/A	0889	+27 889	Mass Calling	
089	089	N/A	089	+27 89	Mass Calling for migration period, then free	
New Mobile / Premium Rate:			9			
090			090	+27 90	Premium Rate	100 million
091			091	+27 91	Available for new codes	100 million
092			092	+27 92	Available for new codes	100 million
093			093	+27 93	Available for new codes	100 million
094			094	+27 94	Available for new codes	100 million
095			095	+27 95	Available for new codes	100 million
096			096	+27 96	Available for new mobile codes	100 million
0970			0970	+27 970	Available for new mobile codes	10 million
0971	071	+27 71	0971	+27 971	Mobile	10 million
0972	072	+27 72	0972	+27 972	Mobile	
0973	073	+27 73	0973	+27 973	Mobile	
0974	074	+27 74	0974	+27 974	Mobile	
0975			0975	+27 975	Available for new mobile codes	10 million
0976	076	+27 76	0976	+27 976	Mobile	
0977			0977	+27 977	Available for new mobile codes	10 million
0978	078	+27 78	0978	+27 978	Mobile	
0979	079	+27 79	0979	+27 979	Mobile	10 million
0980			0980	+27 980	Available for new mobile codes	10 million
0981			0981	+27 981	Available for new mobile codes	10 million
0982	082	+27 82	0982	+27 982	Mobile	
0983	083	+27 83	0983	+27 983	Mobile	
0984	084	+27 84	0984	+27 984	Mobile	
0985	085	+27 85	0985	+27 985	(Mobile)	
0986			0986	+27 986	Available for new mobile codes	10 million
0987			0987	+27 987	Available for new mobile codes	10 million
0988			0988	+27 988	Available for new mobile codes	10 million
0989			0989	+27 989	Available for new mobile codes	10 million
099			099	+27 99	Machine Originated	100 million
Other:						
00	09	N/A	00	N/A	International Dialling Code	

SECTION 4 - GENERAL COMMENTS

1. **Establishing a Numbering Database:**

One of the fundamental issues around numbering is access to a database which allows service providers to have oversight of the availability of number ranges. In this regard we support the establishment of a centralised database in the interest of transparency and efficient number management. Presently there is mechanism that can be used to have a holistic overview of what current assignments and allocations have been made to date.

2. **Porting of Numbers:**

Presently both mobile number portability¹ (“MNP”) and geographic number portability² (“GNP”) are governed by regulations that are subordinate to the scheme of numbering contained in the existing numbering plan. The porting regulations provide that a geographic number can be ported provided that any network termination point remains at the location that conforms to the geographic boundaries associated with a number block as determined by the Authority.

The only boundaries that should be defined by the proposed numbering plan are the boundaries of the geographic national destination code (NDC). These boundaries must be established and determined according to the Geographic Information System (“GIS”), which is commonly used by various government institutions. The new plan should in no way restrict an end user from porting a number within the same geographic boundary.

A further limitation embedded in the proposed regulations is the inability to port toll-free or inbound services numbers. This places a huge constraint on the consumer’s alternative choice of service provider and is an impediment to effective competition in the relevant service markets.

This constraint can easily be removed by enabling the porting of such numbers in the proposed draft regulations.

3. **Proposed Definitions to be added to the Definitions Section:**

The following terminology is used in the *Explanatory Note* in Government Gazette 33270. However, they are not defined in the *Draft Numbering Plan Regulation* (the *Regulation*), although they are often used in the body of the regulations. This may give rise to a situation of various interpretations depending on the context in which these phrases are used. Hence this section should be refined to include additional definitions of terminology used in the regulations that have not been defined, and to remove definitions that may be confusing, irrelevant or redundant in the Regulations. In order to obviate a situation of disputing the interpretation we suggest that these be clearly defined in the definition section:

¹ Contained in Government Gazette No.28091 published on the 30 September 2005

² Contained in Government Gazette No. 33145 published on 23 April 2010.

Concept of Premium Rated Services:

The *Explanatory Note* as well as the regulations refers to a “*Premium Rate Communication*”, “*Premium Rate number*” and “*Premium Rate Service*”. Neotel submits that it is necessary only to define what is commonly known in the sector as a *Premium Rate Service*. The other two definitions then become redundant, as a premium rate service is a communication that is associated with a premium rate number. This definition conveys to the subscriber that the cost of the service is higher than as a result of nature of the service provided.

In this regard we propose the following definition of:

“Premium Rate Service” - means a service that is charged at a higher rate, where the call charge is split between the Licensee and the service provider.

This would eliminate the need to define a premium rate number as well as a premium rate communication.

“Allocation”

This term has been used within the context of the regulation with an implied meaning, instead of a clear definition. In order to correctly establish the status of numbers within the plan in a situation where numbers are allocated to a service provider and subsequently withdrawn, we suggest a definition that gives clarity to the context that is referred to in the regulations. The following suggestion is proposed:

“Allocation”- means the granting of a right to use a number from a designated number range to a network operator, service provider or end-user.

Definitions on the Status of Numbers

“Released number/s” – means numbers that:

- (i) have been released by the Authority, or
- (ii) have been withdrawn by the Authority from the providers named in the numbering plan record, or
- (iii) have been withdrawn by the Authority from all providers; or
- (iv) are in the “protected” status

“Reserved number/s” – means numbers that

- (i) have been retained by the Authority for a provider that is not named in the numbering plan record, or
- (ii) the number has not yet been withdrawn by the Authority from the provider; or
- (iii) the number has not yet been returned by the provider; or
- (iv) the number has not yet been returned by the provider, and
- (v) the expiry date that is shown in the numbering plan record has not yet been reached.

Toll-Free Services

Conceptually toll-free numbers should in fact be free to the calling party, in order to give effect to the intention of having such a service. Under the current numbering framework, the service is only toll-free if it is called from a specific network and is billed at a normal call rate when called from alternative networks. The resultant effect is that this service is not a genuine toll-free service. Although the Authority has taken a position on the provision of such services through correspondence directed to the various operators, this concept has been inadequately addressed in the regulations.

It is within this context that we suggest that a clear and precise definition be framed in relation to this service. We propose the following:

“Toll-Free” – means a number that allows callers to call a particular service without being charged for the call. The charge for the number is paid by the called party instead of the calling party.

Code Types referred to in the Regulations:

The definitions of the different code types are not contained in the regulation although the terminology, in respect of these codes is referred to in the regulation. Neotel suggests that for ease of reference the code types be clearly defined in the regulation. In this respect the following definitions are proposed: description of what these codes are. However, they should be contained in the definition section of the Regulation for ease of reference and clarity.

“Type A” Code – means codes utilized for “essential public services”. All providers shall make these codes accessible. Current examples of such codes are Presidential Hotline-17737, Emergency Services Code 112 and Government Directory Services.

“Type B” Code – means codes that are associated with specific service providers. Other providers may make such codes available on their network by entering into agreements which enable the provision of the service associated with the relevant code. An example of such a code would be where service provider X has a service on the code 1818, then provider Y may have an interconnect agreement with X, thereby allowing a subscriber of provider Y to access the service through the point of interconnect on network of provider X.

“Type C” Code – means codes that are available for service providers to use as they on their own networks, usually referred to as “on-net codes”. These codes are assigned internally to a specific network by the service provider.

1. Regulation 1- “Definitions”

In respect of the definition and designation of ‘premium rate numbers’:

- a. ICASA should define what is meant by ‘Premium rate number’ without referring to the numbering plan itself, since no consistent definition is found there. For example, ‘premium rate communication’ is referred to in section 14(1) in reference to the automatic origination of communications. However, Neotel submits that there is a range of services that attract a premium rate that do not relate to the automatic origination of communications. These services often use a ‘revenue share’ business model, whereby the terminating operator shares part of the call termination revenue with the terminating customer.
- b. ICASA should determine with industry the inter-operator payments that are applicable in respect of such ‘premium rated’ calls, possibly using similar categories to those employed by the premium rated short code services employed by the mobile operators. These numbers could be used for calls to services such as competition lines, tele-voting, information services, automated teleconferencing, fax to email and calls to charity lines, which is consistent with the on-net use of these numbers by Telkom.

2. Regulation 4 - Allocating and Reserving numbers

This regulation outlines the requirements to be met for the purpose of reserving and allocating numbers. Although the regulation considers the reservation of numbers it does not define the status of a reserved number. In this regard we suggested that a reserved number be included in the definition section.

3. Regulation 4(1)g - Allocating and Reserving numbers

In its current form it reads as follows:

A provider may apply in writing to the Authority for an allocation or reservation of numbers. When doing so the provider must state –

(g) the expected utilisation of the numbers one six(6) months after the application is granted;

This regulation needs to be revisited. Neotel suggests the following construction of the aforesaid provision:

(g) the expected utilisation of the numbers six(6) months subsequent to the application being granted;

4. Regulation 4(8) - Allocating and Reserving numbers

This regulation provides that applications will be processed in the order in which they are received. In order to implement this provision efficiently and effectively, the authority needs to allocate reference numbers to each application to distinguish the date of receipt of each application.

5. Regulation 5 - Withdrawing numbers

Regulation 5(c) provides that numbers will be withdrawn were they have been allocated but NOT assigned six months after the allocation. It would be preferable for these purposes to refer to numbers that have not been activated within this period of time rather than withdrawing the assignment. This provision should be read in conjunction with the Number Audit regulations (GG 32107 published on the 6 April 2009) which will be used to verify the status of the numbers allocated and assigned.

6. Regulation 11 – Assigning numbers

The time periods for allocation and assignment to providers must be aligned to that of resellers or end users as there is no rationale for the 12 month period allowed for resellers.

7. Regulation 14 – (Showing Tariffs through numbers) (1)

Recommendation:

It is suggested that this be re-phrased to read “*Transparency of Tariffs associated with numbers*”.

Comment:

If this provision is correctly understood, then the objective would be to alert a user to the realisation that the service associated with the use of this number attracts a higher charge rate as it may be a premium rated service. Therefore a specific number range is dedicated to services of this nature and service providers are required to make known publically the higher charges that apply to such services. It is not clear from the construction in 14(1), what this provision is attempting to achieve.

Recommendation:

It is recommended that Regulation 14(1) and 14(1)(a) be amended to read as follows:

(1) ***A call by an originator to a premium rated service number must consist of one or more communications if -***

(a) all the communications after the first communication are originated automatically ***pursuant*** to the first communication;

- **Regulation 14 (“Showing tariffs through numbers”): (2)**

Operators that offer geographic number calling services should be allowed, in respect of all calls to geographic numbers for which call termination rates are greater than 50% above Telkom’s highest call termination rate, to run a message lasting no longer than 9 seconds explaining that calls to this number attract a premium rate charge.

- **Regulation 14 (“Showing tariffs through numbers”): (3)**

As discussed in *Neotel’s submission on call termination*, it is submitted that the Authority should insert into this Regulation the following paragraphs:

- a. “All providers that have been allocated geographic numbers, should ensure that retail customers are afforded a price to dial numbers within each of those local three digit prefix areas, as set out in Section 24, Table 3, for calls to every other operator (off-net calls) to a geographic number, and for calls to its own network (on-net calls) to a geographic number”.
- b. “All providers that have been allocated geographic codes with three digit prefixes, as set out in Section 24, Table 3, should ensure that retail customers are afforded a price to dial numbers within regions corresponding to each of the first and second digits of national numbers, for calls to every other operator (off-net calls) and for calls to its own network (on-net calls)”.
- c. “All providers that have been allocated geographic codes with three digit prefixes, as set out in section 24, table 3, should ensure that retail customers are afforded a price to dial numbers between regions corresponding to each of the first and second digits of national numbers, for calls to every other operator (off-net calls) and for calls to its own network (on-net calls)”.

- **Regulation 14(4), (“Showing tariffs through numbers”): (4)**

In respect of calls to 080, 0860 and 0861 numbers:

- a. Neotel submits that calls to a 080 number should give rise to a **charge by the originating operator to the terminating operator** that is equivalent to the relevant call termination rate (market 1 in Neotel’s call termination submission – within ‘ONN’); the terminating operator can then buy conveyance and transit as needed (per markets 2, 3 and 4).
- b. Calls to an 0860 number (for which the consumer is charged the ‘local’ rate), should not attract a charge by the originating operator to the terminating operator, provided that the call is handed over ‘within ONN’ area (the terminating operator can then buy conveyance and transit as needed (per markets 2, 3 and 4 in *Neotel’s call termination submission*)).
- c. Calls to a 0861 number (for which the consumer is charged a ‘national’ rate) should not attract a **charge** by the originating operator to the terminating operator, no matter where the call is handed over.

8. **Regulation 15 (Ensuring consistency in the use of numbers) (1)**

As discussed in Neotel’s submission on call termination, the Authority should consider inserting into regulation 15 a new paragraph as follows:

'All providers that have been allocated geographic codes with three digit prefixes, as set out in Section 24, Table 3, may not provide a customer outside of any three digit geographic area with a number corresponding to that three digit geographic area code. Notwithstanding this provision, operators may offer to forward calls to such numbers to a customer's premises if those premises are outside of the relevant '6NN' or '0NN' geographic area.'

9. Regulation 16 – Maintaining Numbering Records

The reference and description of “*allocated*”, “*reserved*”, “*released*” and “*protected*” numbers must be moved into the definition section, instead of regulation 16 (3).

10. Regulation 17- Audit Numbering Issues

This provision should also refer to the Number Audit Regulations promulgated by the Authority, which sets out in detail the auditing requirements.

11. Regulation 24 (“Geographic numbers”, Table 3):

ICASA should provide all operators using geographic ‘0NN’ numbers with the geographic boundaries of those numbers. Table 3 in the draft regulations should therefore be developed into a map which can be provided to all operators. For example, in the current map of geographic numbers that ICASA provided Neotel and that Neotel is using, the areas 040, 042, 045, 046, 048 and 049 do not exist, yet they exist in Table 3. All of the operators need to be provided with the geographic boundaries of these new areas, and Neotel would like to be allocated numbers in these areas.

ADDITIONAL COMMENTS

12. ICASA’s ‘premium rate, higher-band and lower-band’ numbering categories

1. Neotel submits that the distinction between ‘higher-band’ and ‘lower-band’ in the numbering plan regulations, in the context of the assignment of numbers in those bands, implies that calls to and from mobile numbers are expensive and calls to and from geographic numbers are cheap. As the sector becomes more competitive, and the mobile and fixed call termination rate gap narrows as a consequence of the Authority’s current interventions, price differences between calls to and from mobile and geographic numbers will decline. Rather, ICASA could consider maintaining the current names for the numbers as they are allocated. In other words, after the migration to 11 digit dialing proposed by Neotel (by adding a zero in front the number for calls dialed from within South Africa after the migration), the 096, 097 and 098 bands could be referred to as ‘mobile’ numbers, and the 06 band could be referred to as ‘geographic’ numbers. Furthermore, as discussed below, the 086 range, such as 0861 and 0860, should be retained and referred to as numbers for ‘Inbound calls’, which is what they are currently referred to as.

2. Neotel agrees that all 'premium rate' numbers should be allocated to the '90' range. Nonetheless, Neotel submits that the Authority define what 'premium rate' means, which is a call that attracts a price that is significantly higher than prevailing retail voice calling rates. A standard use of premium rate numbers is that these numbers can be used to share call revenues with content providers. Such services include but are not limited to: competition lines, tele-voting, information services, automated teleconferencing, fax to email and calls to charity lines.
3. Furthermore, ICASA should consider maintaining the naming conventions for the USALs and the VOIP operators. The new number allocations in the 0987 and 0985 ranges should continue to be referred to as USAL and VOIP operator numbers, due to the unique services offered by operators using those numbers.

13. Framework for determining new geographic boundaries for new '0NN' / '6NN' numbers

Neotel notes that, in the Authority's *Explanatory Note*, in *Section 24*, the Authority explains that the geographic boundaries associated with geographic numbers need not be strictly adhered to. Neotel submits that the geographic boundaries of the '0NN' and '6NN' number ranges should be defined clearly by the Authority, by appending as a schedule all of the key towns and areas corresponding to the geographic area code. These boundaries should be adhered to by all operators using geographic numbers in those areas. The Authority should also ensure that the geographic boundaries of the area codes are made publicly available in a detailed geographic information system format. The Authority should set out in the regulations a process whereby the schedule containing all of the relevant geographic area code boundaries can be amended. When the Authority deems it necessary to change the geographic boundaries of existing dialing codes and add new dialing codes into the numbering plan, all operators that have geographic numbers in the area code where changes are proposed should be asked to provide input to the Authority on the new boundaries. Once the new boundaries are decided on by the Authority, the changes could be made by an amendment of the schedule setting out the geographic boundaries of the area codes in the numbering plan regulations.

CONCLUSION

Neotel has attempted to address as a priority what we perceive as the core issue to be resolved, namely a numbering plan and regulations directing an instantaneous and effective changeover from 10-digit dialing to both 10-digit and 11-digit dialing and then phasing the 10-digit dialing out over a comfortable transformation period, finally to reach an 11-digit dialing only. Furthermore, Neotel trusts that our inputs to the regulations will contribute liberally to achieving the objective of an outstanding and successful set of Numbering Plan Regulations.

Neotel compliments the Authority with a great effort and looks forward to the successful outcome of this process.