



Comments on Draft Number Plan Regulations

**Response to invitation to submit written representation on draft
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1) INTRODUCTION

Telkom SA Limited, herein “Telkom”, welcomes the Authority’s intention to make numbering plan regulations in alignment with the Electronic Communications Act (36 of 2005). This document is Telkom’s submission in response to the invitation to submit written representations on the proposed draft Number Plan regulations (Government Gazette 33269). Telkom would welcome an opportunity to participate and make oral submissions at the public hearings scheduled for the 17th and 18th of August 2010.

This document is divided into two main parts:

1. Section 2 provides general comments on the new Numbering Plan Regulations and the associated Explanatory Note. The section gives a broad overview of the key outputs of the regulations and the Explanatory Note as construed by Telkom and the anticipated impact on Telkom and the industry in general.
2. Section 3 comments on the specific sections of the regulations and the Explanatory Note. Here Telkom provides an interpretation of each regulation where Telkom is in doubt of its own understanding of the regulation or where it seeks clarity on the content. Where Telkom, through its understanding of the regulations, identifies a gap inherent in the regulations, Telkom will propose an appropriate remedy.

2) GENERAL COMMENTS ON THE REGULATIONS

Telkom would like to commend the Authority in its efforts to present a detailed and comprehensive draft Number Plan regulations document to the industry. The document presents evidence of the considerable effort made by the Authority to address a majority of the shortcomings inherent in the preceding Number Plan regulations of 2006 (Government Gazette 28839). Of greatest significance in the draft Number Plan regulations, is the clear intention by the Authority to systematically and progressively increase the number capacity of the Number Plan to cater for the ever increasing subscriber base. It is apparent that the Authority views the diminishing capacity of the Number Plan in serious light and the draft regulations indicates the Authority’s visionary foresight to address the capacity problem over the medium to long term.

Telkom also acknowledges the Authority’s concerted effort to foster greater harmonization in the allocation and use of numbers by service providers. In particular, Telkom expresses its approval of the Authority’s inclusion of a short code and supplementary code strategy into the new numbering

plan regulation. Telkom shares the view that the rationalized use of short codes for similar applications will create a conducive numbering environment for new entrants to rapidly deploy services and make them available to subscribers of other networks. If defined properly, the grouping of substantially similar services into similar codes, as envisaged in Section 26 of the Explanatory Note, will provide a single reliable point of reference for new entrants and eliminate the need to enter into multiple agreements with existing providers in order to provide basic short code services.

Telkom also welcomes the Authority's inclusion of the expanded list of number administration activities (i.e. releasing, allocating, withdrawing etc.) as captured in Section 3 to Section 6 of the new number Plan regulations. The regulatory guidelines for the number administration activities are expected to provide effective gate keeping in the allocation of numbers and consequently yield higher efficiencies in the usage of numbers by providers and end-users alike. The regulatory guidelines are expected to assist in the prevention of the duplicate allocation of numbers to multiple providers as it has happened in a few isolated cases in the past.

Telkom is particularly grateful of the Authority's intention to retain geographic numbers in the Number Plan regulations over the medium term. Telkom shares the Authority's view that geographic numbers still have a commercial significance to customers since they are inherently indicative of the location of the called customer and the expected tariffs. Essentially Telkom is pleased with national geographic numbers still consisting of 10 digits.

Notwithstanding Telkom's general support for the positive intention of the proposed Number Plan regulations, Telkom is nevertheless unclear on how to read and construe the draft Number Plan regulation in conjunction with the Explanatory Note (herein also EN). It is unclear to Telkom whether the Authority intends to gazette both documents, in their final form, as binding documents that are enforceable as legislative instruments of the number Plan regulations. It is Telkom's view that the draft regulations do not provide a substantive understanding when read in isolation to the supplementary Explanatory Note. For example, the definitions for some terms that are critical for the clear understanding of the regulations, currently reside in the Explanatory Note document and not in the regulations (e.g. "*high band*" and "*low band*"). The absence of these and other definitions from the regulations may render the regulations incomprehensible in their solitude making it necessary to gazette the Explanatory Note as a legislative subset of the regulations.

Although Telkom would, in principle, support the implementation of Phase 2 and Phase 3 of number plan changes, Telkom is however concerned about the projected timelines for implementation as proposed by the regulations. Telkom is of the view that the twelve months provisioned by the Authority for the implementation of Phase 2 of the number plan changes, is completely inadequate

taking into consideration the level of system development and business coordination required to ensure the successful implementation of the changes and the associated update of telephone directories. Furthermore, Telkom highlights that the proposed changes for Phase 2 of the number plan changes will not be confined to each operator, and will require coordination between operators especially during the period of *“parallel running”*. The changes are also expected to have an impact on inter-operator agreements such as Call Termination and Number Portability Agreements, that will have to be amended to align with the number plan changes. Operators will also have to engage their internal processes to source the funding required to establish projects that will facilitate the implementation of the number changes. As such, Telkom deems appropriate implementation leadtimes of approximately twenty-four (24) months from the date of promulgation of the regulations for Phase 2 of the number plan changes; and for Phase 3 changes, Telkom estimates implementation timelines of the order of five (5) years..

3) SPECIFIC COMMENTS ON THE REGULATIONS AND THE EXPLANATORY NOTE

3.1. REGULATION 1: DEFINITIONS

a) Tariff bands

The regulations define four tariff bands namely *‘premium rate’*, *‘higher band’*, *‘lower band’* and *‘toll free’*, that have been introduced by the Authority *“to promote tariff transparency”* (Page 4 of the EN; and Pages 4-6 of the regulations). Telkom is of the view that, in the absence of the detailed context provided by the EN, the definitions for the different tariff bands as captured in Regulation 1 are not sufficiently descriptive of the tariffs that should be anticipated by the consumer. For example, the regulations define a premium rate number as *“a number that is classified as such in the numbering plan”* (Page 8 of the regulations). Telkom’s view is that such a definition cannot be qualified as adequate since it does not link the reader directly to the tariffs associated with premium rated services. The vagueness in the definition is also perpetuated in the definitions of high band, low band and toll free in a similar manner. To obtain a more complete understanding of the expected tariffs, the reader is left with no option but to consult with the Explanatory Note whose legal stature is unclear to Telkom. Telkom is of the view that such clarity in the definitions should reside solely in the numbering plan regulations that will be *gazetted* as legislative instruments.

The EN further defines premium rated communications as *“envisaged as being typically more expensive than conventional fixed or mobile communications ... (Page 4)”* and similarly high band communications is *“...envisaged as being typically more expensive than mobile communications.”*

Telkom is of the view that the frame of reference used in the EN to define the different tariff bands, is completely inadequate. The frame of reference is not specific and is open to interpretation by operators. Neither the regulations nor the EN provides any insight to the changes linked to fixed or mobile communications as they are used as references for the definitions of premium rate, high band and low band tariffs.

Telkom would strongly advise the Authority to align with work being done in these numbering regulations with the Authorities efforts and the feedback of the various operators to regulate call termination; as Telkom is of the view that the two matters are inseparable. At the public hearings on call termination many operators made statement regarding the generic costs vis-à-vis fixed and mobile operators. Many operators pointed out to the Authority that over time the gap between fixed and mobile communications will converge towards an asymptotic rate. In Telkom's submissions on call termination, we requested a termination rate of 37c as being cost based (excusing universal service obligations). This is in contrast to the Authorities proposed 40c for mobile operators in 2012. Telkom is of the view that the established mobile operators were accepting of a 40c rate precisely because there is an economic profit at that level. Hence Telkom is of the view that it is likely that currently in South Africa the costs of mobile operators per subscriber (above a certain scale) is lower than that of fixed operators.

Telkom would expect that given time and trailing the convergence in wholesale rates that the difference in retail rates between fixed and mobile will converge until the retail rates of the types of communication are indistinguishable. Skeptics may point out the "mobile premium" that users associate with the value of having a mobile device, however it is equally Telkom's contention that there is a "fixed premium" in the ability of users of such networks to make local calls and be charged lower rate therefore. Telkom's' arguments align with the general principles of convergence whereby operators will operate both fixed and mobile networks, possibly in an integrated fashion as network platforms converge to allow cost efficiencies. This is in fact the entire *raison de entrée* for the EC Act and the reason that converged ECS and ECNS licenses are issued, as opposed to fixed and mobile licenses.

It would be very shortsighted if these numbering regulations were to instead ensconce the notion that there is somehow a difference between fixed operators corresponding to a lower band, and mobile operators corresponding to a higher band. This is not to say that all distinctions should disappear altogether, however, merely that mapping upper and lower to mobile and fixed respectively is egregious.

Thus Telkom is essentially proposing two notions:

- 1) The numbering table should firstly separate geographic and non-geographic number, as has been done. This allows users to discern the “reachability” of users they are dialing i.e. mobile is to the person, fixed is to the place.
- 2) Secondly within geographic numbers the Authority should discern between lower band and higher band. To this extent an explicit long distance retail threshold rate should be applied. This rate may be obtained from a study of the domestic retail fixed call market (which should have been conducted prior to a call termination market review). In the absence of such a study, Telkom would like to propose a 70c rate.

Telkom is extremely concerned about the current practice of operators porting geographic numbers from Telkom, and then charging users exorbitant retail rates without adequate warning to consumers. Consumers have come to associate geographic numbers with affordability due to Telkom’s historically low rates; however number portability breaks this equivalence relationship. The reputational damage to “honest” fixed service operators e.g. Telkom and Neotel cannot be underestimated. The premium that new entrant operators charge consumers in these instances is not as a result of revenue sharing, and as such the operators would not be obligated to acquire premium rate numbers.

The Authority may note that Telkom does not see there to be a need to split non-geographic numbers between higher and lower band. Although one will observe that both fixed and mobile services are and will be offered in this band, Telkom is of the view that there being a differential between the retail rates of the various services is narrow enough not to warrant separated bands. Moreover, consumers do not associate non-geographic numbers with low rates, and thus there is unlikely to be any consumer harm with such an arrangement.

The Explanatory Note further describes ‘toll free’ communications as *“intended to be free to their originators and be available from all networks (Page 5 of the EN)”*. It is unclear to Telkom whether the Authority requires toll free services to merely be simply available from all networks or whether the services should be made available from all networks “free of charge”. If indeed the latter is applicable, in other words *“true toll free”* then Telkom iterates that it currently provides toll free services, free of charge, only to call originators that access the toll free services from Telkom’s network (i.e. on-net calls). The commercial framework for toll free services is structured such that the called party will incur all charges related to the toll free call. The consequence of making toll free services free of charge from all networks (“true toll-free”) is that called parties may see themselves incurring higher call charges that may include tariffs related to wholesale call termination. In such

scenarios the charging model becomes significantly complex; leaving only the owner of the toll free service exposed to the risk of high off-net call charges. Telkom also argues that owners of toll free services may want to make an economic choice to only allow on-net call originators to access their toll free services in an effort to reduce costs related to the service. Telkom further highlights that a few years ago, an industry Committee was convened to explore ways of achieving “true toll-free” calls across all networks. At the time, the committee was unable to reach agreement on an acceptable model for “true toll-free services. Telkom therefore recommends the reconvening of a similar industry committee to facilitate the establishment of a suitable commercial framework for “true toll-free” services.

b) Code Types

Telkom notes that the emergency code 112 is used in the Explanatory Note as an example to Type A codes that are “... *intended to be adopted for essential public services. All providers are obliged to make them available (Page 5 of the EN)*”. Telkom would like to refer the Authority to the minutes of the meeting of the National Disaster Management Advisory Forum (NDMAF) dated 09 April 2010 and chaired by the Department of Cooperative Governance & Traditional Affairs (GoGTA). The objectives of the forum were to promote the harmonization of emergency numbers across all provinces to ensure that emergency services are easily accessible to local and foreign visitors who will be in attendance of the Soccer World Cup. In a meeting of the NDMAF, held on the 09th April 2010, a decision was taken to make the emergency code 112 accessible on the mobile networks and the emergency codes 10111 and 10177 accessible from fixed networks (see APPENDIX A). The decision was made to ensure alignment of stakeholders (network operators, municipalities, emergency services, communication agencies etc.) on the use of emergency codes in time for the Soccer World Cup. In alignment with this decision, Telkom has since made the emergency code 10111 accessible for security emergencies and 10177 accessible for medical emergencies. The short code 107 (in supplement to 10111 and 10177) is currently being used by Telkom for National Emergency Services in various parts of the country, and according *Table 6* of the regulation, the code will be withdrawn from all operators after Phase 2 of the changes. The emergency code 112, on the other hand, is currently inaccessible from Telkom’s fixedline network as agreed in the forum engagements. Telkom encourages more intimate engagements between the Authority and the NDMAF to align visions on the intended future of emergency numbers. GOGTA has undertaken to reconvene further engagements with the NDMAF to map a way forward with regard to the rationalization of emergency services. The next meeting of the NDMAF is scheduled for the 12th August 2010.

The Explanatory Note defines 'harmonized Type C short codes' as "... expected to be used only for substantially similar services (Page 5 of the EN)". Telkom cautions on the use of the words "substantially similar" in the definition of the code types. Telkom of the view that the use of these words renders the definition too vague for implementation since it leaves too much scope for interpretation by different operators. Telkom further emphasizes that the Authority will need to exercise great care in the classification of 'harmonized Types C short codes' to ensure that no operator is unfairly disenfranchised by the classification process.

c) Other Definitions

Telkom further recommends the following amendments to the definitions:

- The removal of the phrase "responsible for" from the definition of "recipient" (Page 6 of the regulations).
- The definitions of "Type "A", "B" and "C" (Page 6 of the regulations) short codes be defined in the regulation (as per the explanatory notes).
- The word "length" in the definition of "utilization" does not provide adequate clarity to the definition. Telkom proposes the use of the word "period of time" to substitute the word "length" (Page 7 of the regulations).

3.2. REGULATION 2: OBJECTIVES OF THE REGULATIONS

It is Telkom's view that the objectives of the regulations could be expanded much more extensively to provide a clearer outlook of the aspirations of the intentions of the regulations. Telkom does not object to the objectives of the regulations per se, but merely points out that they lack specificity with respect to the intended goals of the regulations. Telkom proposes the following expansions for the objectives:

a) To provide for the efficient use and allocation of numbers;

- i. To provide adequate numbering capacity for geographic, non-geographic; mobile and short code services*
- ii. To ensure that there is sufficient numbering capacity for future services.*
- iii. To outline processes for the effective allocation of numbers to licensees*
- iv. Introduce improve classification and harmonization for the use of short code and supplementary codes*

b) To accommodate varied protocols used and services provided by licensee under the EC Act ;

- i. To allow equitable access to competing networks by users*

- ii. *To support regulatory tools such as number portability, carrier pre-selection*
- iii. *To ensure that numbers are used for the intention agreed upon with the Authority*
- iv. *To ensure that numbering administration processes are clearly defined and adhered to*
- v. *To accommodate inter-operation between numbering and the Internet Domain Name System*

The abovementioned are some of the detailed objectives proposed by Telkom for consideration by the Authority. Telkom is of the view that the objectives should be specific, achievable and measurable. The objectives should also serve to shed some insight into the short-term and long-term goals of the numbering plan roadmap. It is Telkom's view that such extensive elaboration in the set objectives will serve to assist operators in their long-term planning for business and operational systems that will support the new numbering plan.

3.3. REGULATIONS 3-6: NUMBER ADMINISTRATION ACTIVITIES

3.3.1. General remarks

Telkom is unclear on the period provisioned by the Authority to indulge in consultation upon receipt of a number application for the Authority's consideration. *Page 11* of the regulations refers to a consultation period of *"twenty-eight days (28) days"*, with the definition of "days" being omitted from the regulations. In contrast, the Explanatory Note refers to a consultation period of *"twenty-eight (28) business days (Page 10 of the EN)"* as it was prescribed in the preceding Numbering Plan regulations of May 2005 (*Government Gazette 28839, Page 13*)¹. Telkom also requests clarity on the recourse (legal or otherwise) that licensees can undertake should the Authority fail in its efforts to deliver a decision on the success of an application to the licensee within the prescribed *"twenty-eight business days"*.

A common recommendation from Telkom customers is to establish capability to be able to track the progress of an application as it goes through the various milestones of the approval process. Telkom customers share the view that they would be greatly empowered if they could be able to reliably track the progress of an application from a web based database. Such a tool would enable operators and customers alike to plan for the provisioning of services and would alleviate the numerous enquiries made to licensees and to the Authority on the progress of number applications.

¹A number of customers have indicated that they expect reduced approval timelines for applications.

3.3.2. Regulation 5: Withdrawing Numbers

The Explanatory Notes iterates that the “... powers of the Authority entails giving due notice, so that providers can bring about orderly replacement of numbers for end-users (Page 11 of the EN).” Telkom proposes that the minimum period for the allowable due notice be stated categorically in the regulations, with the Authority reserving the right to amend the allowable period as and when it sees fit. The minimum period will assist operators in the planning of minor and major number changes.

Regulations 6(2) and 6(3) require providers to effect the decisions of the Authority within “*twenty-four (24) hours*” of receiving a notification from the Authority (Page 15 of the EN). Telkom contends that this regulation may prove to be practically impossible to comply with, considering the number of available working hours in a natural week. The regulation leaves little room for failure in systems and processes that facilitate the compliance to the regulation. Furthermore, in the event that such a notice reaches the provider at the end of a business week (e.g. Friday 16:15), the provider may have the challenge in effecting compliance within the provisioned 24 hours due to the unavailability of competent staff at the time of receipt of the notice. In-light of the above , Telkom therefore recommends that the Authority considers revising the provisioned period of twenty-four (24) hours to a less stringent leadtime of seventy-two (72) hours so as to encompass all possible permutations of non-work days (i.e. weekends, public holidays etc.)

3.4. REGULATION 7: ROUTING COMMUNICATIONS TO NUMBERS

Pursuant to the discussion on Type A codes for emergency service in Section 3.3.1 of this document, Telkom reiterates that it may be in the public’s interest for operators not to comply with *regulation 7(6)* (Page 16), as demonstrated in the NDMAF engagements on the rationalisation of emergency service numbers. Telkom contends that there could be a pressing public need to facilitate the routing of Type A codes on one type of network and not on another. In such cases, the regulations should allow sufficient flexibility for the Authority to exercise its discretion and allow for discrimination of the routing of codes.

3.5. REGULATION 9: TRANSFERRING OF NUMBERS

Telkom would like to bring it to the Authority’s attention that regulation 9(2) which states that “*a provider may transfer numbers to another party only by transferring the licence under which the numbers are allocated and reserved (Page 16 of the regulations),*” may have a significant impact on

the business activities of licensees. Following the transfer of a license, a provider may have in its possession, two different commercial agreements with the same operator (e.g. termination rate agreement, Number Portability agreement etc.). As such, Telkom highlights that an operator may be treated differently by another for similar services (e.g. number routing), depending on commercial agreement that holds applicable to the allocated number range. Telkom further proposes that all license transfers be announced on a public platform by the Authority to assist providers with the alignment of commercial agreements.

3.6. REGULATION 10: PORTING NUMBERS

Regulation 10(1) (*Page 16 of the regulations*) requires providers to include numbers that have been ported **out** in its submission of the numbering audit data. Telkom requests clarity on whether the numbers ported **in** should constitute the numbering audit data that is to be submitted by the provider.

3.7. REGULATION 11: ASSIGNING NUMBERS

Regulation 11(5)(a) requires “*end-users and resellers to agree, in writing, with the provider to taking the numbers out of use*”.

Telkom contends that numbers per se are not a service; rather they are a resource granted by the Authority to operators. Numbers are not granted to end users, and as such end users should not and cannot be granted the right to “hold hostage” or “capture” those numbers. Instead services are provided to end users, and the terms upon which those services are offered are regulated via a set of regulations pertaining to ECS licences, the most applicable of which is likely to be the Code of Conduct in this instance. It is beyond the purview of these regulations to regulate the nature by which services are provided to users.

To the extent that Telkom under our ECS & ECNS licences has a basic voice obligation, we acknowledge the obligation to provides users with a basic voice service, however reserve the right to offer such services in the most economically and technically efficient means. Currently Telkom fulfils this obligation using a variety of technologies e.g. copper line, fixed wireless e.g. DECT, WiMAX-d, fixed-mobile e.g. WCDMA, satellite etc. From time to time Telkom migrates users from one technology to another. The reasons therefore may be that technology has reached end-of-life e.g. SOR-18, TDMA or that Telkom has recently acquired spectrum that allow a more efficient technology to be deployed e.g. WCMDA. Although Telkom does endeavour to create a little disruption to users

during such services, in some cases disruptions are inevitable. Specifically sometimes users are asked to migrate from geographic to non-geographic numbers or vice-versa.

Although it was perhaps not the intention of regulation 11(5) to say as much, in its current form the regulation could be interpreted to mean that Telkom is unable to perform technological migrations if end users did not give their written approval, where such migrations would have an impact on end-users from a numbering perspective. Sometimes Telkom may take the number out of use per se, however in other instances the number could be transfer to other customers, however for the original customers the number is “taken out of use”.

Telkom contends that providers should be granted reasonable flexibility to exercise their right to withdraw a number from an end-user or reseller, and that regulation 11(5) should be deleted accordingly.

As another example, please consider the event that an end-user has emigrated from the country but failed to notify the provider of their intention to do so, the provider should be able to exercise its discretion reasonably to withdraw the number and add it to the number pool for reassignment. However, the provider should be able to prove beyond reasonable doubt that it had failed persistently in its endeavours to contact the end-user and seek agreement on the discontinued use of the number. Such powers granted to providers will assist providers in the management of assigned number and improve the overall effectiveness and efficiency of the utilisation of numbers by providers.

3.8. REGULATION 14: SHOWING TARIFFS

Regulation 14(2) proposes that *“the originator of a premium rate communication must not incur a charge until after acknowledging a free of charge audible or visible indication about the tariff.”*

Telkom is curious regarding the rationale for Regulation 14(2). To the extent that operators use premium rate numbers for premium rate calls, why is there a further need to warn users of the premium rated nature thereof, for surely the number code itself would do as such? Further the regulation speaks about “free of charge” whereas by definition a premium rate call charges a premium. The regulation thus prime facie appears absurd in that it implies that the call origination provider must in effect give users a free call to dial a premium rated number? Telkom advises that sub regulation 14(2) be deleted in its current form.

The regulation may however be applicable to SMS communications as it speaks to concept of “opt in opt out” commonly used by Wireless Application Services Providers (WASPs) where end-users are given the option to accept or reject the service offered to them. Premium rated services are commonly offered by content providers such as WASPs who use the capability of network providers to offer such services. The tariff model for premium rate communications is such that both the content provider and the network provider are able to charge the end-user for different components of the service offered (i.e. the network provider would charge for the call setup and the content provider would subsequently charge for the content consumed).

Telkom contends that it would be onerous for a network provider to be able to setup a call such that total tariff (i.e. the total of network and content charges) of the premium rate communication is made transparent to the end-user upon the setting up of the call. In the case of a voice call, an announcement could be injected at call setup to warn the subscriber of premium rate nature of the service and the possibility of higher call charges however, it would be impractical for the network provider to communicate the exact call charges on a call-by-call basis. In the case of sms premium rate communication, the responsibility of communicating the service charges should lie with the content provider and not the network provider.

With respect to regulation 12(3), Telkom asserts (as per various operator submissions on the handset subsidy regulations), that it is outside the purview of any numbering regulation to regulate the charges that operators charge end users for ancillary services to the primary service being offered. In this case the regulation speaks to *call blocking*, Telkom would like to point out that this feature is not “free” to Telkom as part of our PSTN however instead incurs costs as part of our Intelligent Network platform. Thus it is more than reasonable that Telkom charges end users for such a service. Telkom requests that 12(3) should be deleted.

Regulation 12(4) which speak to toll free should be deleted as it doesn’t speak to the issue of the relationship between tariffs and numbers.

3.9. REGULATION 15: ENSURING CONSISTENT USE OF NUMBERS

Regulation 15(3) proposes that *“The Authority must publish in the Government Gazette a characterisation of the substantially similar services for which a harmonised type C short code may be use ...”* Telkom reiterates the sentiments already discussed in Section 3.2 of this document that the characterisation process of harmonised codes should be conducted transparently in consultation

with industry players to ensure that characterisation does not benefit certain providers at the expense of others.

Telkom further supports the approach in the Regulations where the Authority has ultimate control of the harmonised short codes including those beginning with 1, 3 and 4 (*Page 16 of the Explanatory Note*). Telkom supports the concept of a single entry point for all matters pertaining to numbering and is of the view that the Authority is the ultimate legal entity with appropriate powers to resolve complex matter pertinent to numbering.

3.10. REGULATION 22: FUTURE NATIONAL NUMBERS AND SHORT CODES

Table 1 of the regulations indicates that the codes 01 – 09, are reserved for “international applications in Phase 3 of the numbering plan changes. Telkom would like to highlight to the Authority’s that the abovementioned reservation equates to a total numbering capacity of Nine Hundred (900) Million numbers being reserved for future international applications. Telkom requests clarity from the Authority’s, perhaps in the form of market studies or any other substantive documentation that informs the Authority on the requirement for such excessive numbering capacity for the provision of international services.

3.11. REGULATION 24: GEOGRAPHIC NUMBERS

Telkom is particularly appreciative of the Authority’s intention to retain geographic Telkom shares the Authority’s view that geographic numbers still have a place in residential and business markets and that customers will continue to benefit from savings linked to distance-based pricing.

Telkom is however concerned about the growing trend by certain licensed operators, who offer Voice over Internet Protocol (VoIP) services using geographic numbers. In such cases, the VoIP services are erected in areas where the numbers have no geographic significance to the area. Telkom highlights that providers that persist to use geographic numbers for non-geographic purposes are in breach of the usage conditions for the numbers, and should be at risk of having their allocated numbers withdrawn as prescribed in Regulation 5(1).

The Explanatory Note (*Page 24*) seems to suggest a less strict approach to adherence to geographic number boundaries. This relaxation of boundary areas carries a significant risk of incorrect routing of

calls destined for prescribed geographic locations. A practical applicable example is that of emergency services that are accessible via short codes 10111 and 10177. For these services, the call needs to be routed to the nearest security or medical services centre for a rapid response, depending on the location of the calling party. If the information relating to the location of the calling party is unreliable from the perspective of the provider, the call carries the risk of being routed to the wrong emergency station that may be further in distance from the calling party's location (see *comments from Ekurhuleni municipality in APPENDIX A*).

Furthermore, the relaxation of boundaries of geographic numbers creates significant complications in the porting process between providers. From Telkom's point of view, the success of concluding a Geographic Number Portability (GNP) porting process relies heavily on the provider being able to link the geographic number to the exchange area that services the customer. Thus stricter control over the geographic boundaries would greatly assist Telkom in concluding porting processes expeditiously.

Telkom would further recommend that the area code maps associated with *Table 3* of the Regulations (*Page 26*) be made available publically to all operators to enable them to have a visual view of the exact boundaries of area codes. This will enable all operators to assign the correct numbers in any given area across the republic.

3.12. REGULATION 25: NON-GEOGRAPHIC NUMBERS

The Explanatory Note (*Page 21*) seems to suggest that the different tariffs linked to the different subranges of the '086' and '087' non-geographic number, have an inherent negative industry effect of constricting development due to the unwillingness of customers to make calls to such numbers. Contrary to the Authority's view, Telkom affirms that in its observation, it has witnessed a high level of adoption of services associated with non-geographic numbers. In particular, the *MaxiCall* service which uses the '0861' subrange, has gained popularity with Small, Medium and Micro Enterprises (SMMEs) who appreciate the value of a single number that can easily be remembered by customers from anywhere across the country. Telkom contends that non-geographic number offer an inherent benefit of ease of access and the ability to memorise a single number for multiple geographic locations. Telkom further contends that this benefit far outweighs the marginal increment in related charges of the non-geographic service.

3.13. *REGULATION 26: SHORT CODES BEGINNING WITH '1'*

Telkom supports the Authority's intention to acquire overall control of short codes. For the purpose of emphasis, Telkom would like to echo the view already communicated in Section 3 of this document, that a need of public interest may arise which requires Type A codes to only be accessible from selected networks (e.g. 112 from mobile networks; 10111 and 10177 from fixed networks). Such a need may be advised by the technical feasibility or economic viability of implementing the service over the different networks. Telkom is of the view that the Authority should grant itself sufficient flexibility within the regulations to exercise its discretion when prescribing the conditions for the use of Type A short codes.

Sub-regulation 26(1)(b) proposes that on completion of Phase 2 of the number plan changes, no short code beginning with '1' should be used for internal network purposes. Telkom currently utilises up to 860 short codes in the 109XXXX range for internal routing purposes. Telkom contends that, unlike other operators, its large distribution of network nodes, will incur high development costs, should the company be obligated to comply to sub-regulation 26(1)(b). Telkom therefore recommends that the Authority retains the 109 short codes as Type C code for internal routing purpose. Telkom further recommends that sub-regulation 26(2)(c) be amended to facilitate seven (7) digits in the length of the code, so as to accommodate Telkom's implementation of short codes for routing purposes.

3.14. *REGULATION 27: SHORT CODES BEGINNING WITH '3' AND '4'*

Telkom welcomes the authority's intention to take ownership of short codes beginning with '3' and '4' and categorising them as Type C short codes. The 'release' status of the short codes upon the Regulation taking effect will yield significant benefit for new entrants who wish to offer WASP services, by ensuring that such services can be made available expeditiously on the provider's network.

3.15. *REGULATION 29: PHASE 2 NUMBER CHANGES*

Telkom welcomes the authority's intention to implement Phase 2 of the Number Plan changes and also shares in the Authority's short term vision of improving tariff transparency; improving consumer confidence; formalising the treatment of short codes beginning with '1', '3' and '4'; and possibly release more numbering capacity for non-geographic numbers; and regrouping machine originated

number in an appropriate range. Telkom is of the view that the process that is to be undertaken is generally appropriate for the goals envisaged; Telkom will endeavour to support the Authority in its mission to achieve the goals. Following a preliminary high-level impact study conducted by Telkom on the implementation of Phase 2 of the changes, Telkom would like to bring the following concerns to the Authority's attention:

- a. Telkom expects the changes to have a tangible impact on the following elements of its business;
 - Network switches
 - Customer Relationship Management Systems
 - Service Fulfilment, Assurance and Billing systems
 - Fraud Management Systems and;
 - Intelligent Network platform
 - Points of interconnection
 - Payphones
- b. Telkom expects twenty thousand (20000) of its older payphones that no longer have supplier support will not have the capability to dial the leading '9' that will be used to access premium rate services. These payphones will need a software upgrade that requires supplier intervention.
- c. The successful implementation of Phase 2 of the number plan changes will therefore require the following:
 - Sufficient time for planning, design, development and commissioning of all work required in (a). Telkom proposes a period of eighteen (18) to twenty-four (24) months from the date of the Regulations taking effect.
 - Telkom needs to build the budgetary capacity to be able to complete development work on all the platforms. The project is expected to cost in the order of tens of millions and as such, the capital need to be budgeted for and allocated.
 - The project will require inter-operator coordination to ensure that network changes are well aligned. Lessons from the Geographic Number Portability (GNP) project will be useful in estimating the level of complexity and expected timelines.

3.16. REGULATION 30: PHASE 3 NUMBER CHANGES

Telkom expects the number changes proposed in Phase 3 of the number changes, to yield the positive effect of increasing the numbering capacity of non-geographic numbers. Notwithstanding the expected positive impact of the Phase 3 number changes, Telkom nevertheless expects major challenges to be associated with the change of the leading '0' to a leading '6'. The expected

challenges are due to the fact that the current leading '0' is so deeply embedded in the coding of Telkom systems and would require a extensive system development to successfully implement the change. Phase 3 of the changes is expected to take three to five years to complete from the date of the Regulations taking effect.

3.17. REGULATION 31: CONTRAVENTIONS AND PENALTIES

Regulation 31(1) prescribes the penalties that may be imposed on providers should they be found guilty of contravening the regulations by the Complaints and Compliance Committee (CCC). Nevertheless, Telkom highlights that, as indicated in *Figure 1* of the Explanatory Note (*Page 8*), there are a significant number of numbering administration activities that involve the Authority to a certain degree. Furthermore, there are also other activities where the role of the Authority is significantly extensive and providers are heavily reliant on the efficiencies of the Authority's processes and its ability to deliver decisions within the provisioned timelines. Where there are delays incurred in such cases, it is fair and conceivable to link non-compliance to the regulations to the delays experienced within the internal processes of the Authority. As it was previously discussed in Section 3.3.1 of this document, Telkom humbly requests clarity from the Authority through these regulations, on the recourse that can be undertaken by providers in holding the Authority accountable for contraventions of these regulations. For example, any delays in the approval process of a number application have a ripple effect on the delivery timelines that have been committed to the end-user by the provider. Whereas end-users can hold the provider accountable through the provisions of Regulation 21, providers on the other hand have no such legislative mechanism to ventilate their dissatisfaction with the internal processes of the Authority.

4) CONCLUSION

Overall, Telkom embraces the general approach to the efforts exerted by the Authority to develop the numbering plan regulations that are consistent with the Electronic Communications Act (36 of 2005). Although Telkom generally supports the vision of the proposed number plan regulations, Telkom remains concerned about: the expected cost of compliance to the regulations; as well as the timelines provisioned by the Authority for the implementation plan. Telkom is hopeful that the contributions made herein will receive the Authority's most favourable consideration and thanks the Authority for the opportunity granted.

APPENDIX A: MINUTES OF THE NDMAF MEETING HELD ON THE 09TH APRIL 2010**cooperative governance
& traditional affairs**

Department:
Cooperative Governance and Traditional Affairs
REPUBLIC OF SOUTH AFRICA

**DRAFT AGENDA**

**MEETING OF THE NJPST PRIORITY COMMITTEE NO. 18 : TASK TEAM : RATIONALISATION OF
EMERGENCY HOTLINES, HELD ON 29 APRIL 2010 AT 09:00 IN ROOM S.37, COGTA BUILDING, 87
HAMILTON STREET, ARCADIA, PRETORIA**

1. OPENING AND WELCOME

Mr Mlungisi Gongqa, Manager: Disaster Management (NDMC/CoGTA) chaired the meeting and welcomed everyone present. He explained that the matter was originally raised at an IMC meeting on the 19th March 2010 with the request to investigate the rationalisation of emergency numbers for the country as well as investigating the possibility of flattening or softening the boundaries when it comes to emergency numbers. A full report must be submitted at the next 2010 Inter-Ministerial Committee meeting scheduled for 30 April 2010.

On 16 April 2010 a meeting was held with all the emergency communication role players to try and find a solution for the rationalisation of emergency hotlines for the 2010 FIFA World Cup. The matter was discussed at length and various suggestions were made. However, the fact that no cellphone operators were invited to participate in the said meeting, posed a problem.

It was ultimately decided to establish a Task Team comprising the NDM Steering Committee, together with representatives from Telkom, SAPS, Department of Communication, Department of Health and representatives from the various cellular networks, to consider the various matters that were raised.

2. ATTENDANCE

The attendance list is attached – Annexure A.

3. APPROVAL OF THE AGENDA

The agenda was approved with the following additions:-

- Item 6.1** **112 Emergency Regulation**

- Item 6.2** **MTN / EUROP ASSISTANCE**

- Item 6.3** **VODACOM / NETCARE**

- Item 6.4** **CELL C / ER 24**

- Item 6.5** **Telkom**

- Item 6.6** **Neotel**

5. FOR DISCUSSION

5.1 Possible solution regarding the rationalisation of emergency numbers for FIFA 2010 WC

The meeting noted that:

- a) Telkom will look into the issue of finding a mechanism to assist municipalities to re-route emergency calls to the correct destination at no cost.
- b) Ekurhuleni Metro is in the process of publishing a booklet with the **emergency numbers i.e. 112 (mobile operators), 10177 (EMS), 10111 (SAPS)**. The information contained in the booklet is very generic. Since the exercise was originally only intended for Ekurhuleni, they will need financial assistance to print sufficient for distribution throughout all the provinces.
- c) Dr Theu (DoH) will determine whether his department is doing a similar exercise or not in view of assisting Ekurhuleni with the funding.
- d) The proposed booklet should also contain a sentence regarding hoax calls.

5.2 Possible monitoring mechanism for emergency calls

The meeting noted that:

- a) Europ Assistance indicated that one of their main protocols is to stay on the line with a caller no matter how long it takes to reach the relevant SP.
- b) The other emergency call centre operators agreed with the above *modus operandi*.
- c) ER 24 indicated that their statistics are handed over to Cell C. In view of drawing statistics it would be to ascertain whether the number of emergency calls are higher than the norm.
- d) Mr Kesten confirmed that at a previous meeting it was decided that the Provinces would obtain information from the municipalities and pass it on to the NDMC.

5.3 Solution for language barriers at the various SA Emergency Call Centres

It was decided that English would be the language for communication at the emergency call centres and that provinces can devise a mechanism by using Universities etc. for some of the more common international languages – i.e. have a list of contact numbers and patch the caller through for language assistance, etc.

5.4 Handling and prevention of hoax calls

- a) Make more use of public awareness regarding hoax calls, etc.
- b) Europ Assistance *via* their partners, MTN send out SMS notifications regarding hoax calls. They also fill out reports to determine which numbers called in the most for the month (the obvious hoax calls – hoax in the sense that they keep quiet, swear at the agent, etc.). Their agents are well trained to ask relevant questions in the event of a real hoax call and find that people generally panic if it is a real hoax and end the call.
- c) The trend for hoax calls are normally during the school holidays.
- d) The municipalities normally have a problem with hoax calls from “ticky boxes” – the children somehow know that these calls cannot be traced.
- e) It remains difficult and impractical to trace hoax calls – their priority is to assist people in the event of an emergency. It is more important to just get the person off the line.
- f) Determining GPS coordinates regarding where a call is emanating from is possible, although not always legal. A caller has the right to privacy.
- g) Vodacom indicated that it is not easy or practical to determine GPS coordinates.
- h) It will be useful if Telkom can obtain the correct cell or even three cells in the area – to enable them to determine the location of the nearest 10111 centre.
- i) Neotel has geographical and non-geographical numbers.

5.5 Promoting / publishing emergency numbers nationally

Dealt wuth. See Item 5.1

5.6 Questionnaire at call centres for agents to mobilize the correct responder(s)

Dealt with.

5.7 Communications between the various JOCS and Emergency Call Centres

- a) Neotel was working for DoC at the NATJOC during the Confederations Cup, but it was uncertain whether any arrangement has been made regarding the World Cup.
- b) DoH has identified lines between the provincial operations centre and the National Operational Centre. These will also be made available to the NDMC. However, this is not a common line but only for easier communication in the event of an incident.
- c) The NDMC linkage will be directly to the NATJOC and the PROVJOCS.

5.8 Process for fault reporting and priority handling of communications (voice and non-voice) at the various JOCS and Emergency Call Centres

It was agreed that any caller must be able to speak with a person when calling in the event of an emergency.

5.9 Confirming the routing of emergency numbers (mobile and Telkom) to the correct call centres in the various Provinces, Districts, Municipalities and Host Cities

- a) It was proposed that Telkom and the relevant customer (municipalities) discuss the cost of pricing and cost of re-routing calls to another emergency centre be dealt with bi-laterally. *(To be read in conjunction with the three national numbers: 112, 10177, 10111).*
- b) It is necessary to have a comprehensive database of all the emergency numbers in the country that will assist in finding the correct area of a service provider. Every municipality has a unique emergency number. If a call is received in a completely wrong area, the caller can either be patched through to the correct area or given the correct number to dial.
- c) Mr Anthony Kesten (Ekurhuleni Metro) undertook to provide a list of every unique emergency number of every municipality in the country.

6. ADDITIONAL ITEMS

6.1 112 Emergency Regulation

Mr Chris Dobson (MTN raised the question regarding the 112 Emergency Regulation and the requirement to establish a 112 Emergency Communication Centre that was published approximately two years ago. The said regulation addresses the rationalising of emergency numbers and a proposed tender process.

Ms Anneke Grond (DoC) explained that the Electronic Communications Act provides for a single communications number and it will be 112. For the last three/four years the DoC has been busy with a pilot centre in the Strand, Cape Town. The centre did not use the 112 number. It tested the concept of how to answer emergency numbers and re-route them to the appropriate service provider. It handled emergency medical and fire service calls for a certain region in the Western Cape. People dialling the 10111 or any of the other normal numbers were routed to the 112. From there the centre filtered out the hoax calls and passed on the emergency calls. The pilot ends on 30 April 2010. The calls have been re-routed back to the actual emergency centres. There was a process of procuring a PPP (Private Public Partnership) of establishing this centre nation-wide. That process has not been completed.

6.2 MTN / Europ Assistance

MTN's partners, Europ Assistance explained how their service operates.

The meeting noted that:

- a) In preparation for 2010 Europ Assistance obtained statistics from the LOC regarding the number of expected visitors to the country.
- b) Contingency plans are in place, the number of staff have been increased and provision has been made to increase the volumes by approximately 70%. They are currently averaging \pm 1,2 million.
- c) They work in close liaison with their major Service Providers (SPs), i.e. DoH, who is providing information and insight into their plans, i.e. number of vehicles, increase of staff, etc.
- d) Europ Assistance is primarily a medical company and operates from their offices.

- e) The operation entails the “patching” of the emergency calls to the relevant SP in the required area.
- f) The operation is very efficient on their side, but delays in answering the calls on the SPs side does affect their efficiency.
- g) The following questions were posed by Telkom to all the cellular operators:
 - What emergency numbers do you promote?
 - Do you only have one national call centre or several in various regions?
 - How do you determine what the caller’s emergency and location is?
 - Do you use a standard questionnaire?
 - Language barriers.
- h) Reply:
 - 112 is an all-inclusive government number advertised by government.
 - Europ Assistance is based in Roodepoort. 14th Avenue.
 - Profiling of the caller is done by means of a custom-made system that is developed in-house, which gives out cell sights and the cell number of the caller and the location. In the event of a hoax call, the caller immediately hangs-up once you ask them to confirm that they are calling from a certain location.
 - Language barriers. This issue has been workshopped by all the cellular operators and it was realised that the visitors who are expected in the country are not your middle-class citizens, and they can all speak some kind of English. If however, problems are encountered, they do have operational plans in place, being an international company.

6.3 Vodacom / Netcare

The Vodacom representative explained how their service operates.

The meeting noted that:

- a) Vodacom has three 112 call centres, i.e. Durban, Johannesburg and Cape Town.
- b) The cell no and location is provided to the service provider.
- c) They also operate on 10177 and 10111.
- d) They have an agreement with Telkom in Cape Town, who supply them with the numbers of the closest SAPS, ambulance, etc. for that area.
- e) Whenever they have a new cell, they provide Telkom with the latitude and longitude (geographical routing) and Telkom will provide the location of the nearest SAPS and ambulance service etc.
- f) The system is programmed to automatically switch to the 10111 in the area in the event that a routed call is not answered. This system is not advisable – i.e. to route a medical or fire emergency call to the SAPS.
- g) The service provider (municipalities) made it very clear that, if they do not answer a call promptly, it means that they are busy and cannot take the call right now.
- h) The question of fees was also raised. If you call 10111 or 10177 etc. from a Telkom line, it is a Toll Free No. with no charges. It was not certain whether these numbers are free of charge on Vodacom.

- i) Many of the European customers are used to 911. If that number is dialled in South Africa, it automatically recognises it and transfers it to the 112 number.

6.4 Cell C / ER 24

The representative from ER 24 explained how their operation functions.

The meeting noted that::

- a) ER 24 operates the Cell C 112 call centre which is situated in Paulshof. They only have the one centre. It is totally separate from the ER 24 or 124 Emergency Centre.
- b) The caller phones in, the operator determines the area from where the call emanates and the nature of the emergency. The calls are scrutinised and re-routed to the relevant service provider.
- c) In terms of their contingency plan they have increased their staff, all vacancies have been filled. Systems have been upgraded and a new database has been implemented.
- d) They share the same concern as the other cellular operators, namely that their efficiency is determined by the efficiency of the service provider.
- e) The reason why they use the 112 number is because 112 is GSM number, established by the GSM MOU the *de facto* emergency number in Europe.
- f) It is also easier for a blind person to tap in 112 than any other number.
- g) As a licensee, Cell C is obligated to provide emergency service assistance to their subscribers – either themselves or by appointing a third party – ER 24.
- h) Their SLAs provide for the provision of GPS, electronic communication, etc.
- i) The ER 124 number is only for medical assistance. Anybody phoning 124 for a non-medical emergency will be transferred to 112.

6.5 Telkom

- a) Telkom explained that their normal SOPs and disaster plans are in place. As a supporter of the FIFA event, Telkom has met all the FIFA criteria with regard to the stadiums, hotels where the players, managers and guests will be accommodated, etc.
- b) Twenty-four people will be present at the stadiums.
- c) A separate call centre has been set up dealing only with FIFA-related communication problems.
- d) A 24-hour “bridge number” will be operated between the call centre and the stadiums.
- e) Pre-identified and screened dedicated people will be present in the exchanges or critical areas in the regions. This was already tested during the Federation Cup.
- f) Telkom is also responsible for the normal emergency numbers, i.e. 10177 etc.
- g) A dedicated person will be looking after each of the critical services.
- h) Dedicated service managers will be on standby for all government departments, especially in view of disaster recovery requirements.

- i) In reply to the question regarding the cost for municipalities to re-route incorrect calls, Telkom explained that there is a difference between dispatching a call and routing a call. Mobile operators dispatch a call – The numbers 10111 etc are done by geographical routing.
- j) Telkom is the custodian for the 10111 database (all the Police Stations) for the SAPS.
- k) The Emergency Call Centres of the municipalities find it difficult to obtain the database from Telkom. They often find that a caller does not know the area from which he is calling, which makes it very difficult to dispatch a service. Telkom indicated that there is also a dedicated service manager for all municipalities.
- l) Telkom requested that they be provided with the contact details of one or two dedicated people in the various NATJOCs, PROVJOCs, VOCs, etc.

6.6 Neotel

- a) Neotel explained that they do not use the 112 number. They facilitate the 10111 and 10177 lines and they transfer these calls to Telkom.

6.7 Summary

- a) The chairperson indicated that after listening to all the mobile operators, it would seem that the greatest problem lies with the service providers. There does not seem to be a problem regarding the softening of the boundaries.
- b) From the service providers perspective it appears that the problem is when a person calls an emergency number from a Telkom line. As an example, Ekurhuleni receives many calls meant for Johannesburg and *vice versa* (the exchange is situated somewhere on the border of these two cities). The cost of re-routing those calls to the correct call centre is very heavy for the municipality. Between the two centres, there is no mechanism to allow for quick transfer of such a call. What they need is a system from Telkom where an emergency call can be directed, without cost, to the correct centre.
- c) In the event that a call centre is down for some reason or other, it will take three/four hours to restore. It was noted that, if a line is down, Telkom is responsible. If a PABX is down, it is the responsibility of an outside vendor. The cause of the problem will determine how long it will take to fix. Telkom is also able to re-route emergency numbers.
- d) Although it has been agreed to publicise only three emergency numbers (i.e. 112, 10111 and 10177), there are numerous numbers called emergency numbers in the various areas. It was agreed that those numbers will remain and serve as a database for use by the advertised numbers.
- e) Mr Anthony Kesten (Ekurhuleni Metro) undertook to provide a list of every unique emergency number of every municipality in the country.

f) CoGTA will issue a policy statement indicating that the boundaries will be softer and no matter where an emergency call is answered, the caller will be assisted.

g) ICASA and SITA must be invited to the next meeting.

7. DATE OF NEXT MEETING

It was decided that the Communication Task Team would meet every two weeks. The date of the next meeting to be determined.

8. CLOSURE

The meeting adjourned at 12.30.

ANNEXURE A**APOLOGIES:****Mr George Kilian (NDMC/CoGTA)****Mr Jurgens Dyssel (NDMC/CoGTA)****Mr Schalk Carstens (Western Cape PDMC)****Mr Prince Morare (**

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