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Amended Number Portability Regulations
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Dear Sir

Re: Cell C's written submission with respect to the Draft Number Portability Regulations

1. Cell C would like to thank the Authority for the opportunity to provide written comments on the draft the Draft Number Portability Regulations as published in *Government Gazette 41275* on 24 November 2017 ("The Regulations"). Cell C appreciates the extension to the due date for submissions as granted by the Authority.
2. Cell C looks forward to engaging with the Authority should the Authority have any queries on Cell C's written submission below.
3. Cell C confirms its readiness to participate in any subsequent consultations and oral hearings that might be called by the Authority.

Kind regards



Themba Phiri (Mr)
Executive Head: Regulatory

CELL C RESPONSE TO ICASA ON PROPOSED AMENDED NUMBER PORTABILITY REGULATIONS

Cell C Ltd (Cell C) has set out its response to the consultation on the Draft Number Portability Regulations of 24 November 2017¹ (the Regulations) by addressing each provision in sequence. We note that these Regulations, when finalised, will replace the Regulations made pursuant to the Telecommunications Act, 1996 (now repealed) (the 2005 Regulations).²

However, by way of introduction, Cell C would like to reiterate an important point made to ICASA in previous submissions regarding the use of number portability as a tool to promote competition in the interests of consumers. We draw your attention to the provisions of section 2(f) of the Electronic Communications Act, 2005 (ECA) regarding the promotion of competition within the sector. Number portability should be implemented in a manner that does not inconvenience the consumer. In fact, we note that our competitors, MTN (Pty) Ltd (MTN) and Vodacom (Pty) Ltd (Vodacom) agree with this notion:

- MTN states in the introduction to its submission that MNP *"is often perceived as an effective and necessary way to maximise competition and consumer choice of network service providers"*³ and later *"...the primary purpose of number portability is providing individual end users the choice of service providers"*.⁴
- Vodacom has helpfully provided quotations from each of the European Commission and the Federal Communications Commission in the United States, both of which support the notions of the consumer interest and the promotion of effective competition.⁵

In Annexure A to our submission to ICASA in response to the Inquiry into the Number Portability Regulations of 26 August 2016 (the Inquiry Document)⁶, Cell C listed the number of occasions on which it has approached ICASA regarding the need to amend the existing regulations to support competition and protect consumers. In Annexure B to that submission, Cell C included a number of international references to support our arguments. For ease of reference we have included our response to Question 15 of the Inquiry

¹ Gazette 41275.

² Gazette 28091.

³ Page 2 of the MTN submission to ICASA on the draft Regulations, dated 28 October 2016.

⁴ Page 6, *ibid*.

⁵ Page 6 of the Vodacom submission to ICASA on the draft Regulations, which is not dated.

⁶ Gazette 40232.

Directors: Kuben Pillay (Non-Executive Chairman); Laurence Nestadt (Non-Executive Deputy Chairman); José dos Santos (CEO);
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Document which asked “Do you think consumers are adequately protected by the Number Portability regulations?”:

“Cell C does not believe that consumers have adequate protection at all. Cell C has submitted many arguments in this regard to ICASA, which are attached to the submission for your ease of reference. Consumers, in our experience, are unaware of the real rights that apply to them in relation to porting – they do not understand that they can port even if they are within a contract period. They do not understand that they can obtain benefits like free calls and promotions on every network, not just the one they are on. They also are often misled about the loss of these benefits on the current network and the costs to port out. Cell C also has concerns about the calculation of the amount that contract customers must pay to exit a contract early. Whilst Cell C charges only the amount remaining on the handset, we are aware that MTN and Vodacom have applied (and may still apply) a penalty-type termination fee to porting-out consumers. This on its own is a disincentive to port.

Worldwide porting has been regarded as one of the most important features of a competitive market. If a consumer wishes to port he or she should be able to do so with the utmost ease. Instead our experience as the small operator and the challenger network, has been that consumers face significant barriers and lack of information or disinformation about the process, are subjected to unnecessary delays and rejections, and are often put off the process altogether because of a perception that they get “more” on their current network by virtue of the club effect (the offers of on-net discounts and promotions within the club tends to create a larger club, and this is a self-fulfilling prophecy, resulting in continued growth in the same network’s subscriber base).

Competition cannot thrive in an environment where the regulatory authority does not support it – without regulations that ensure that donor operators cannot impose penalties for porting, do not delay porting unnecessarily, and do not reject ports without good reason, number porting can never achieve its goal.”

It is against this background that Cell C has considered the Regulations as it is our view that the Regulations as drafted are not sufficiently pro-competitive. Cell C has a share of approximately 12% of the total market revenue – whilst MTN and Vodacom between them have the lion’s share both of the subscriber market and revenue market share (over 80%). It is widely accepted that the South African market for mobile communications is saturated and it is therefore obvious that to grow its subscriber base, Cell C must compete with MTN and

Vodacom to port customers from their networks to its network. Number portability is therefore a critical activity for Cell C.

We have indicated where we believe changes could be made to the Regulation to ensure that number portability becomes a vibrant service enabling licensees to compete for subscribers in a manner that is fair and protects consumers.

Specific comments on the Regulation

1. Regulation 1:

- a. The definition of “Central System” is not used or defined by the ECA. If this is intended to be the national number portability database then the Regulation should rather use this terminology, but it is unclear where the reference would be used. We suggest that it could usefully be referenced in regulations that impose obligations on operators to update databases such as in regulations 5, 6 and 8; and in regulations that deal with the Ordering System Specification (OSS), such as regulation 7. It is preferable that the Functional Specification also refer to the national number portability database. It would be useful to include an obligation within the Regulations that licensees are to agree the OSS with the Number Portability Company (NPC).
- b. There are some references in the Regulations to “service providers”, for example in the definition of “function specification” and “ordering system specification” (OSS) but this term is not defined. ICASA does not regulate service providers that are not licensees, therefore we suggest that all these references be removed entirely, alternatively that a similar definition be included to that in the 2005 Regulation, but that the obligation to impose the requirements of the Regulation on service providers be limited to licensees.
- c. The definition of “recipient operator” requires some amendment for clarity as it seems to be missing the words “which licensee” before “provides a service” and the word “number” after “subscriber” is superfluous. Ideally any mention of “service” would instead be to “electronic communications service”. Therefore Cell C recommends the following definition:
“Recipient Operator” means a licensee to whom a number/s or number block/s has been ported in and which licensee provides an electronic communication service”

- d. Cell C recommends the reinstatement of the previous definition of “winback”. Our further drafting recommendations in this regard are included below.

2. Regulation 2:

- a. Cell C is concerned that the promotion of competition and protection of the consumer is not mentioned at all in the Purpose provisions. These matters are intimately connected with the purpose of number portability – and the major licensees are agreed in this. ICASA itself referred to the protection of consumers in Question 15 of the Inquiry Document.

- b. We recommend that these two objectives be included here.

3. Regulation 4: For formatting purposes we suggest that reference to “mobile numbers” be included as a new subsection (c).

4. Regulation 5:

- a. There is no explanation given for why licensees and subscribers with fewer than 10 geographic numbers could not also obtain number portability. The regulation already requires that the porting happen only within the same geographic boundaries associated with the allocated number block, so it is unclear why porting only 1 or 2 numbers, for example, is not permitted.
- b. Subsection (2) seems to be at odds with subsection (1)(b). Therefore, Cell C recommends the following amendment and substitution:
“(b) the network termination points remain within the geographic boundaries of the national destination codes (NDC) associated with the assigned number block.”
- c. In addition, Cell C requests ICASA to make the NDC geographic boundaries publicly available in a usable format as this is in fact, a public resource. We note that Telkom SA SOC Ltd (Telkom) has refused to make this information available in a workable format. In the absence of this information, any provision related to NDC’s will be unenforceable and create additional delays and unnecessary complications in the process. It is not appropriate that one operator should be permitted to retain control over any aspect that is essential to this process.

- d. The following comment on (3) is applicable also to all the other regulations which contain the same provision, namely regulation 6(1) and (2), and 8(2). Cell C does not consider it appropriate to require licensees to make a list of ported numbers available generally on the internet unless it is made absolutely clear that the list is of numbers only and that no other identifying information can be included; and that the list can only be accessed on a lookup basis, or in other words, by inserting a specific number to check if it has been ported or not, not by accessing the entire list. These restrictions are suggested in the interests of maintaining subscriber privacy and protecting subscriber data, and in the interests of protecting the recipient operator to whom subscribers have ported as a result of winback (see below).
- e. We understand that at present it is possible to access the Centralised Reference Database (CRDB) on the internet and to enter a number to check if that specific number has been ported. We propose that this arrangement be memorialised in the Regulations.

5. Regulation 6:

- a. Subsection (1)(a) is not adequate in our view to ensure that competition between licensees is promoted and protected. The phrase “work together” is not capable of enforcement either as to time or substance. It leaves the arrangements between operators open and subject to abuse. We believe that this subsection is in fact unnecessary because regulation 7 deals with the OSS which is to be agreed between the parties and approved by ICASA, and this document will set out in more detail how the parties should liaise. We suggest that this wording should be removed from the document.
- b. We have noted that MTN (in particular) has complained about ongoing fraudulent ports or ports without consent. Cell C has noted – which is supported by recent press reports – that there is an increase in SIM-swap fraud, rather than fraudulent ports and that the number of so-called fraudulent ports is a fraction of the total number of ports. We note that this has in fact been the case for at least 3 or 4 years. Without dismissing the fraudulent porting of customers which is of concern to Cell C as well, we wish to highlight that whilst it is relatively simple and quick to cancel a port if it is claimed to have been carried out fraudulently, the practise of winback, and the excessive delays and use of “Message 11” by both MTN and

Vodacom as a reason to reject a port request to Cell C, amounts to abuse of their dominant positions.

- c. Regardless of the identity of the licensees, Cell C is of the view that the prohibition on winback should be reinstated but subject to a period of one month i.e. “no donor operator may engage in winback with a porting-out subscriber for a period of one month after a request by a recipient operator to port out that subscriber has been made”.
- d. In this regard, we also suggest that section 5(1)(h) of the Functional Specification should be deleted because it has been abused for the past decade as licensees reject ports without a good reason, on the basis that the rejection could be referred to ICASA (but this has not been a useful deterrent at all in our experience). As the international literature we included in our response to the Inquiry Document points out, there is a particular psychology at play in porting and subscribers are more reluctant to port if the process is subject to unnecessary delays or complications. A Message 11-type rejection such as that now incorporated in section 5(1)(h) would have just this effect.
- e. Finally, in relation to non-geographic number portability, we wish to make three points:
 - i. We reiterate point (a) above in relation to non-geographic porting as well.
 - ii. Although Telkom has been aware of the need to make this porting service available for over a decade, and ought to have readied itself to ensure that it can provide the service, Cell C has experienced reluctance by Telkom to implement full geographic portability on the basis that their so-called “legacy equipment” makes this service difficult to provide. We submit that operators with non-geographic and geographic numbers should be specifically obliged to enable and provide the full number portability service or be considered to be in breach of the Regulation.
 - iii. Cell C notes with concern that Telkom stated in their written submission in response to the Inquiry on Number Portability the following:

“6.16.3 Updating of Routing Tables with CRDB the Telkom’s Telkom’s observations on the current practice within the industry indicate that that operators are not always updating their routing tables timeously. This gives rise to calls to ported customers not being completed to them, but without

them knowing the problems exists. Telkom Mobile in particular has encountered this problem. This problem also creates perceptual problems for Telkom Mobile relating to its mobile service. Telkom will recommend that the Authority investigate and address this matter in greater depth and tighten the obligation on licensees to ensure their routing tables are synchronized and updated timeously to avoid these types of routing problems."

In Cell C's experience this is simply not correct as Telkom itself has not ensured that all its exchanges are updated with latest port information. Cell C has had many complaints from fixed line subscribers who have ported to Cell C from Telkom who could not receive calls from Telkom fixed line and mobile subscribers. Upon investigation it was found that Telkom had not completed the process of updating its routing tables to ensure that all its exchanges correctly routed calls to ported numbers. This has resulted in many cases where the ported subscribers have perceived the problem to be on Cell C's network and have reversed their port-ins. Telkom seems to have dismissed their shortcomings by saying the following:

"Telkom undertakes to seek a solution to this problem within the constraints of Telkom's legacy network as also highlighted to ICASA during the Number Portability Inquiry held earlier this year"

In this regard Cell C re-iterates its recommendation as contained in (ii) above. This is to ensure that routing updates are completed within the prescribed timeframe on all systems associated with a licensee's network irrespective of the service provided, geographic or non-geographic.

- f. Cell C recommends that for each category of number type that can be subject to porting, ICASA include a provision that states the following:

" 1(e) Mobile number portability shall conform to the Functional Specification as contained in Schedule A"

6. Regulation 7:

- a. Instead of the word "published" we recommend that ICASA "prescribe" the OSS by publication in a Gazette as a regulation. This is because under the 2005 Regulations, the OSS was to have been published as a regulation but it was not. This led to difficulties when attempting to enforce the provisions between

licensees, and regarding disputes. This in turn led to delays in the porting process and the unnecessary and unjustified rejection of large numbers of port requests specifically from other licensees to Cell C.

- b. In addition we recommend that ICASA insert additional wording in regulation 7(2) to specifically impose a time period during which licensees should agree on the OSS, failing which this may not happen. Since the licensees already have an active OSS, this should form the basis of the negotiations and reduce the time needed to finalise the document. Cell C considers a 6-month period for agreement between operators to be sufficient, commencing on the date of publication of the Regulation in the *Gazette*.
- c. Finally, on the same subsection (2), Cell C believes that the licensees should first attempt to agree between themselves but in the case of any dispute regarding the OSS, then ICASA should make the final determination, taking account of all relevant concerns, and without delay.

7. Regulation 8:

- a. In our view regulation 8(2) should clarify that the list of numbers should not be disclosed.
- b. We recommend a change to the wording of (3) so that where numbers cease to be active the recipient operator should “no sooner than three (3) months following the date of last usage by the subscriber and one (1) month of quarantine ...” return the number to the donor operator. This is to ensure that the subscriber is in fact not intending to use his or her number again, for example if he or she has travelled out of the country but then reconnects on their return.
- c. We suggest that either in this regulation or regulation 6 or in a regulation of its own, that ICASA include a provision to specifically allow the porting of numbers that are included in a bundle of services – each number should be treated for purposes of porting, as an individual number. This is to ensure that there are no unnecessary restrictions on subscribers that are caused by the practise of bundling.
- d. Cell C recommends the inclusion of the following in this regulation: “Upon receipt of the number/s or number block/s from the recipient operator, the donor operator

must immediately return the number/s or number block/s to the block operator in the case that the donor operator is not the block operator". We say this because "block operator" is defined but not contextualised in the Regulation. There is no benefit to be gained from the block operator or donor operator keeping the number/s or number block/s for a further three months.

- e. The proposed approach will inevitably result in the inefficient management of the numbering resource. Therefore Cell C recommends the deletion of sub-regulation 8(5).

8. Regulation 10:

- a. Regulation 10(1) restricts porting requests to requests made in writing and the same provision appears to apply to both postpaid and prepaid subscribers.
 - i. Cell C submits that a written request to port is unnecessary in the case of postpaid, corporate (geographic and mobile), and non-geographic (080 and 086) subscribers who will in any event have to complete a contract with the recipient operator and enter into a binding commercial agreement. This requirement should specify that it applies to prepaid subscribers only and or VoiP subscribers.
 - ii. Because the term "writing" encompasses digital signatures and encrypted messaging or other digital messaging, we recommend that the words "in writing" be replaced by "...unless it receives a request by electronic means". Previously the requirement in this regard was to use a CLI lookup, which worked well and we see no reason to return to a paper-based system.
 - iii. In this regard, Cell C also notes the requirements of sections 2 and 4 of the Functional Specification. Section 2 provides that a porting request should be made in the manner described in the OSS, whilst section 4 provides that validation of a porting request can take place by way of a one-time PIN or OTP. An OTP could equally be used to confirm a verbal or other form of port request. This could be mentioned specifically in the regulation. In any event, the provisions of regulation 10(1) and the Functional Specification should all be aligned as currently they are saying different things.

- b. Regulation 10(2) requires licensees to apply a warning for no less than five seconds. In Cell C's view this is too long – a subscriber will likely become irritated by this and it may also contribute to the perception that the recipient operator is to blame for a lengthy call set up time – which will put the recipient operator in a bad light. Cell C submits that even the current practise of including a tone prior to call set up is in any event not understood by most subscribers. A 0,65 second warning is sufficient in Cell C's view (as is currently the case).
9. **Regulation 11:** Licensees are all already obliged to put in place and maintain a dispute resolution procedure and a complaints procedure for dealing with subscriber complaints in terms of the End User Subscriber Regulations as ICASA itself recognises. There is therefore no reason to refer to this at all in the Regulation.

10. Functional Specification:

- a. *Section 1:* we suggest that this section could be expanded to clarify that this section also deals with service levels and rules for porting.
- b. *Section 2:*
 - i. Cell C notes with appreciation that ICASA has specified that the process of porting should be recipient-led. This accords with international best practise and is most helpful to subscribers and licensees in competing for subscribers. It would be in keeping with this sentiment to include the prohibition on winback which we have suggested at point 5(c) above.
 - ii. Please note our comments on sections 2 and 4 which are set out in point 9(a)(iii).
 - iii. Subsection (2) contains the same restrictions on porting times as currently apply. However, Cell C is of the view — that porting requests can in fact be made by customers over weekends on an automated basis. We have suggested this to ICASA in our past submissions. This would expedite port requests made on Fridays or Saturday mornings which are common times for requests, which then would not require the subscriber to wait for two days before their request can be addressed (obviously excluding NST time). Cell C recommends that the porting times should mirror that of the retail sector and cater for online shopping. These are general shopping hours, hours during public holidays and over weekends. Customer benefits include convenience and safety.

- iv. Cell C is therefore proposing that allowed porting times should be 07h00 to 21h00 and should include weekends and public holidays. The porting system already allows for ports to be completed when they are submitted after 13h00 on Saturday, Sundays and Public holidays. This should be formalised in the Regulation. The Network Synchronisation Time should be changed, as a result, from 19h30 until 23h30 to be 1 hour only from 21h00 till 22h00 (we understand that this is quite possible).

c. *Section 3:*

- i. Cell C recommends that the information requirement for port requests to include Identity Document/cards or passports and proof of residence should be removed. These requirements need to be satisfied under the Regulation of Interception of Communications and Provision of Communication-related Information Act, 2002 and therefore this reference is an unnecessary duplication.
- ii. Cell C further recommends that ICASA indicate what information would be required for corporate (geographic and mobile) and non-geographic (080 and 086) port requests. In the absence of such prescribed information, there is a risk that donor operators may request information that may present a barrier to the port process as is already being experienced by Cell C in relation to corporate ports.

d. *Section 4:*

- i. Cell C has serious concerns about the requirement that a donor operator “validate” a port request. The process is, as the Functional Specification notes in section 2, a recipient-led process. Therefore allowing contact by the porting-out operator which leaves open a 4-hour window during which time, in the absence of the suggested prohibition on winback, that donor operator could try to persuade or incentivise the porting out subscriber to remain with the donor operator, is simply nonsensical and makes a mockery of the purpose of the Regulations which should be to promote competition. We are of the opinion that this will disadvantage the consumer due to the time delay and this will harm the interest of the consumer.
- ii. In the current arrangements that Cell C has with Vodacom, if Vodacom is the donor operator it is permitted (by commercial agreement) to send an

SMS which advises the subscriber that if the subscriber does NOT contact Vodacom to cancel the port, then the port will proceed. This negative option message is a far more appropriate way for validation to take place since it does not interrupt the process of porting which the recipient operator may have already begun on receipt of the request – but will have to put on hold for 4 hours pending the donor operator “validating” the request. Another alternative is to require the recipient operator to send the OTP.

- iii. We recommend that ICASA adopt either one of these validation procedures, one of which is already in use, as stated above.
- iv. To improve the public’s understanding of the porting process, consumer rights in terms of porting and the benefits thereof, Cell C recommends frequent public awareness campaigns by all stakeholders.
- v. Cell C seeks clarity from ICASA on the process where an Interactive Voice Response (IVR) mechanism is used by the donor operator to validate ports other than mobile ports. The Regulations should, in our view, be unambiguous on validation and information requirements to prevent unnecessary abuse by the donor operators.
- vi. Cell C’s view is that contact by the donor during the porting process ought to be as limited as possible if at all. Both MTN and Vodacom in their submissions on the Inquiry Document acknowledge that a customer ought to be able to choose a network and change to a different network. This being the case, a customer should not then be dissuaded by a non-real time window such as the 4hour window referred to in the Regulations which time the customer has to again confirm his or her desire to port. As we mention earlier in this submission, the psychology of porting is such that delays and extra messages from the porting out operator have a detrimental effect on competition because they negatively influence the customer.
- vii. In Cell C’s view the donor ought to have no contact with the porting subscriber except to confirm any outstanding account balance with corporate subscriber. This confirmation should be made only after the donor operator has received the broadcast message 10 from the recipient operator. This process should not frustrate the normal port process flow and no other requirements must be added to the process by the donor operator.

- viii. Cell C recommends that both subsections (3) and (4) should be omitted. This is for the same reason as advanced in relation to subsection (2), namely that the process is recipient-led. There is no reason whatsoever for the donor operator to have to contact a porting out subscriber for the reasons set out in subsection (3) as they are not relevant to whether or not the donor operator can reject the port request, as set out in subsection (4). The two provisions contradict one another.
- ix. We recommend that a new subsection (3) be inserted in the place of the existing (3) and (4) to read “Other than in the case of section 4(1) and 4(2), the donor operator may not contact the porting-out subscriber for a period of one month.” This would align with the prohibition on winback.

e. *Section 5:*

- i. As indicated above in our point 5(d), Cell C is of the view that section 5(1)(h) should be omitted entirely. The Functional Specification is contained in a Regulation, therefore ICASA cannot simply notify other reasons for port rejections to licensees in writing, it must amend its Regulation. If ICASA wishes to amend a regulation it does not require permission from itself in another regulation, it can simply begin the process of amendment. In any event, ICASA should not agree to ‘other reasons’ in a unilateral fashion, any change should be subject to formal consultation with all licensees.
- ii. Cell C recommends that sub-regulation 5(1)(i) be deleted as well. The donor operator does not need to know where the number is ported to because the recipient operator must ensure that the geographic port is restricted to a specified geographic area. This may result in another unnecessary rejection reason on the part of the donor operator.
- iii. The list of reasons why a port request can be rejected by a donor operator should be as limited and as certain as possible, so there is no room for confusion, abuse or obfuscation.
- iv. Cell C proposes that section 5(1)(g) be amended to read “the number has already been ported within the previous 30 days”. This is because there is no good reason to limit the period to a calendar month – this could potentially extend the period during which a subscriber cannot port his or her number to a period that is longer than one month or 30 days, which is

not the intention of the 2005 Regulation nor should it be the intention here.

- v. Subsection (2) refers to a 5-hour period allowed to a donor operator to reject a port request. This is another barrier to switching for the subscriber. Before the subscriber can be ported, both the subscriber and the recipient operator must wait five hours. Currently Cell C can process a port request in one hour for individual ports. Cell C suggests that there should be a distinction between corporate (geographic and mobile) and non-geographic (080 and 086) ports, on the one hand, and individual prepaid/contract ports, on the other hand. The more lengthy period should apply for corporate (geographic and mobile) and non-geographic (080 and 086) subscribers only.
- vi. We recommend that the 5-hour period be reduced to one hour for individual prepaid and contract ports. This would also be in keeping with the provisions of section 6(2) and 6(3) of the Functional Specification which refer to a 1-hour period.
- vii. Cell C is of the view that short codes that are specific to the licensee concerned e.g. 084 123, should not be capable of porting at all. It is important to have the short code associated with the network that has approved or established the service attached to that short code. Transferring the short code to another network makes little sense in this context and does not allow for on-net non-prefixed access to services.
- viii. Subsection (5) should make it absolutely clear that a rejection on the grounds of suspension should only apply where the suspension has been applied to the customer prior to the port request being made by the customer. It has been our experience that in order to frustrate a port out, other operators will suspend a customer account as a reason to delay or frustrate a port which is anti-competitive and ought not to be permitted. In fact, as we suggest here, it should be specifically prohibited by the addition of the words "prior to the port request" at the end of this subsection.

f. *Section 6:*

- i. In point 6(b) above we recommend that ICASA prescribe the period during which licensees should agree the OSS and furnish this to ICASA to prescribe as a regulation. It would be useful to include an obligation

within the Regulations that licensees are to agree the OSS with the Number Portability Company (NPC).

- ii. This is one matter that must be agreed. It may be sensible to set out in the OSS the other matters which require agreement between licensees, such as specific procedures for the donor and recipient operators when exchanging information including information to be sent, format of the information, the means of the communication, the times when communication may be sent, the time limits for responses and the handling of error conditions amongst others. Failing a recommended list of issues to be agreed in the OSS, operators may dispute the relevance of certain matters being included at all.
- iii. Cell C recommends that the Network Synchronisation Time (NST) should be changed from 19h30 until 23h30 to be one (1) hour only from 21h00 to 22h00. The one (1) hour duration as proposed in subsection 6(3) is supported by Cell C.

g. *Section 7*: there are some typographical errors in this section.