

ECN comments on Draft Amendment to Numbering Plan Regulations, 2016. Government Gazette No 46080

Clause 2.1 “Biometric Data” isn’t a measurement or an analysis as that sounds more like the actual process which sounds closer to “Biometrics”. Should this definition not be changed to “Biometric Data means the personal information generated from measurable human biological and behavioural characteristics, which can be used for identification. These include but are not limited to fingerprints, retinal scanning, voice recognition and Facial Recognition.”

ECN would also like to request a set form of Biometric Data i.e. it has to be Facial Recognition via an ID Document or it has to be finger print or exactly what ICASA envisions will be used to 100% guarantee identity as this would not apply to Juristic persons and thus specifically for Consumers.

Clause 2.3 “Caller Line Identification”. ECN is happy with the substituted definition however this still does not afford the calling party the opportunity to choose one provider for inbound services and another provider for outbound services thus locking the End User into a situation where they can only ever use one provider for all Call Termination services and the requirement to port their numbers every time they would like to move to a cheaper outbound provider.

Clause 2.8 “Dialable Number” versus “Assigned Number”. It seems the only difference between these two definitions is that a Dialable number needs to be (i) active and (ii) that the definition of Dialable number specifically addresses which licensee assigns the number? Is ECN then correct in assuming “Assigned Number” would mean a number simply reserved until activated?

Clause 5.1. The request to submit a proof of payment for a number range not yet awarded – what will happen with said funds if application is unsuccessful or range size changes? Clause 17.1 states the fees are non-refundable but at this stage we don’t know the proposed fee structure in order to fully comment on said impact of these rules either.

Clause 6.1. (2) & (3) Should the Assigned Number be a ported number will it then transfer the requirement of quarantining for 90 days across to the donor operator despite the Number Porting Regulations only requiring a 1 month quarantine because the Number Porting Regulations require

the licensee to return the number to the Block Operator within 3 months from the services being terminated? For example

- Service Terminated 31 March 2022
- Number Returned 2 May 2022 once the 31 days period to object to the withdrawal has lapsed
- Porting Required Quarantine is only until 2 June but Numbering Plan Regulations would require Quarantine 90 days from lapse of withdrawal option so this date would be 2 August 2022

Clause 13.1 – All Machine to Machine related numbers at the moment are prescribed to have 14 digits ... will this mean further changes to existing numbers from 096/7/8xxxxxxxxxx and can the Authority advise on the process of changing said Number allocations already awarded to Licensees.