

5 October 2005

Mr Andrew Haire
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Dear Sir,

Public Consultation On The Review Of Number Portability

CASE has reviewed the paper on the Public Consultation of Number Portability and would like to submit the following feedbacks on some of the questions listed in the consultation paper.

Seah Seng Choon
Executive Director

Public Consultation on the review of Number Portability

Qn:

Is the ability to retain your telephone number a critical consideration for switching from your current service provider to another service provider? What other factors would you consider before switching to another service provider?

CASE's response:

Yes, it is crucial. There is no need to inform your contacts of a new change in number. This is especially so if the person involved has a wide range of contacts.

Qn:

Have you considered obtaining MNP service when switching to another service provider but have been reluctant or discouraged from doing so? What are the reasons for not using the MNP service?

CASE's response:

'Incorrect' caller lines identification display. Hence, as the number is not recognizable by the other party, it can result in that the calls will be abandoned. Complications in connections, consumers would be discouraged with this inefficient service.

Qn:

Do you think the existing MNP solution is adequate, eg, pricing, porting, timeframes, settlement of outstanding charges and other performance experience? What aspects of the MNP solution could be improved upon?

CASE's response:

Perhaps a standard administrative charge should be proposed. The switching fee should be consistent and not prohibitive. Currently the charges in switching are not transparent. CASE could perhaps work with IDA to conduct survey of its members on their feedback on the exiting MNP solution.

Qn:

Discuss on the advantages and disadvantages of implementing number portability using a centralized database approach.

CASE's response:

Advantages: Convenient in switching to another service provider. It will not be inconvenienced by the technical glitches. Consumers only need to pay a one off payment. The fee can also be standardize and consistent.

Disadvantages: The issue of monopoly may arise in either a consortium or an independent third party.

Qn:

Should the centralized database be run by the operators (eg a consortium of the operators) or by an independent and neutral party (eg a third party vendor)? What are the pros and cons of each option identified or proposed?

CASE's response:

Operators forming a Consortium	Third Party
New participants will have a problem because the shares will be fixed and there will need to be redistribution.	Telco company may be concerned that they have to pay a fee to the third party.
	There will be cost involved and the burden is passed onto the consumers.

Qn:

The likely cost components and cost estimates in implementing a centralized database in Singapore? What are the commercial or charging arrangements that can be considered when implementing a centralized database, eg: should the charges be apportioned or recovered from operators based on equal sharing, usage, market share etc? What are the pros and cons of each of these options identified?

CASE's response:

Charges should be apportioned based on usage as it would be fairer. Market usage may not be that fair as a greater market share does not indicate greater usage. Hence, Case's recommendation would be a public listed company to operate the centralized database and that telco owns 49% and the public own 51% of the public listed company. This is to ensure that the company is made accountable to the public on their action. This is also necessary to enhance transparency.

Qn:

What are the pros and cons of direct routing / ACQ versus Indirect Routing? What are the issues and factors that need to be considered in deciding which method to adopt? What are the likely cost components and estimates in implementing a direct routing/ acq in an operator's network?

CASE's response:

As far as consumers are concerned, there should be greater convenience for direct routing minus the glitches experience in indirect routing. Consumers would also expect the cost of switching to come down with direct routing.

Qn:

What impact would the use of a centralized database and change in technical routing solutions have on other industry players such as the mobile content and application service providers? Will mobile content and application providers benefit from a centralized database approach?

CASE's response:

We believe it will help in managing spamming. With the centralization of data base, managers of the data base should be able detect any upsurge in mails by one sender compare to the current decentralized system.

Qn:

What is the impact on downstream markets, eg , telecom equipment dealers and existing ported customers? If so, who are the affected parties and what are these impact?

CASE's response:

Consumers buying telecom equipment should be able to get the require numbers from any telcos at the dealers. We hope that such numbers distribution will be made available online so that there will not be hoarding of numbers by telcos which is what is happening at the moment.

In conclusion, Case's recommendation is that IDA put in place proper regulation in the running of this central database and if need be appoints a 3rd party to manage this database. In this way there will be better control over pricing, distribution of numbers and the standard of service to the general public. However, if a monopoly, be it a consortium or a third party, is formed, there is a possibility that it may turn into a formidable monopoly and as a result pricing will become an issue later.