



Internet Telephony Services Providers' Association

ITSPA response to Ofcom Cross-Platform Switching Consultation

About ITSPA

The Internet Telephony Services Providers' Association (ITSPA) represents over 90 UK businesses involved with the supply of next generation communication services over data networks to industry and residential customers within the UK. Our traditional core members are VoIP providers. ITSPA pays close attention to both market and regulatory framework developments on a worldwide basis in order to ensure that the UK internet telephony industry is as competitive as it can be within both national and international markets.

A full list of ITSPA members can be found at <http://www.itspa.org.uk/>

Introduction

ITSPA welcomes the opportunity to respond to the consultation on cross-platform switching, published on 29th July 2016.

Please note that certain aspects of the ITSPA response may not necessarily be supported by all ITSPA members. Individual members may respond separately to this consultation where a position differs. TalkTalk have confirmed they have responded separately to this consultation and Zen Internet would also like to highlight that they do not support the response. However, the ITSPA Council is confident that this response reflects the views of the overwhelming majority of ITSPA members.

ITSPA's response focuses on one key area: the consequences that the proposals could have in the area of number portability.

Impact on number porting

As Ofcom is well aware, the UK's system for fixed number porting is already plagued by problems that create significant harm and is in need of a complete overhaul. The proposal to implement GPL as set out in the proposals could have unintended consequences for business providers which would further complicate an already cumbersome process.

In summary, although the proposals only refer to consumers, a severe impact would be felt by business providers as the current porting system does not support Ofcom's proposals. More specifically, the number porting system cannot support multiple switch dates and there would be a significant cost impact on business communications service providers due to the changes that would have to be implemented to their number porting processes.

We would urge Ofcom to reconsider the proposals and to provide further details on how they work in practice to ensure that business CSPs are not negatively impacted by the changes. Furthermore, we would



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stress the need not to worsen the fixed number porting environment, which already poses a great deal of challenges to both service providers and their customers.