

Consultation response form

Please complete this form in full and return via email to annualplan2018@ofcom.org.uk or by post to:

Annual Plan Team, SITE
Ofcom
Riverside House
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London SE1 9HA

Consultation title	Proposed Annual Plan 2018/19
Full name	Alex Mather
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Representing (delete as appropriate)	Organisation
Organisation name	The Internet Telephony Services Providers' Association
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We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)	Nothing
For confidential responses, can Ofcom publish a reference to the contents of your response?	N/A

Your response

Do you have any comments on our proposals?	Confidential? – Y/N
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Internet Telephony Services Providers' Association

ITSPA response to consultation on Proposed Annual Plan 2018-19

Introduction

The Internet Telephony Services Providers' Association ("ITSPA") represents over 100 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.

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. However, the ITSPA Council is confident that this response reflects the views of the overwhelming majority of ITSPA members.

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

Reform of the system for fixed number portability

Whilst ITSPA welcomes the opportunity to respond to Ofcom's consultation on their proposed Annual Plan for 2018-19, our members were surprised and disappointed that the longstanding problems with the UK's system for fixed number portability were not featured at all in the proposed plan. Indeed, the issue of switching generally did not appear prominently in the Annual Plan and ITSPA believes that Ofcom should reconsider its shift of focus towards consumer engagement (i.e. encouraging consumers to shop around for the best deals) when serious switching problems still exist.

ITSPA calls for Ofcom to move away from its position of waiting for industry 'to reach consensus' before taking firm action. As ITSPA has previously highlighted, a decade has passed without industry being able to find agreement, and our members believe that there are too many vested interests around the current process for this position to be effective. ITSPA believes it is time for the regulator to take ownership of this problem which continues to create significant harm to consumers and hinder competition – two priority areas for Ofcom.

ITSPA was, however, pleased to see the recent news that Ofcom fined a provider £20,000 and ordered them to pay £1,000 in compensation due to contravening General Condition 18. ITSPA welcomes any moves by Ofcom to take a stricter approach towards enforcement of General Condition 18, although ITSPA does note that the original issue referenced in this case dates from June 2015.

Whilst ITSPA understands that Ofcom may view the complete overhaul of the number portability system as very large and complicated task, simple steps could and should be taken which ITSPA believes would result in an almost immediate improvement to current practices. ITSPA had hoped that Ofcom would use



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the opportunity provided by the review of the General Conditions of Entitlement to amend the wording of General Condition 18 to provide clearer guidance on what is defined as a reasonable timescale for a switch to be completed. However, this was not the case. ITSPA urges Ofcom to reconsider their decision not to alter the General Condition related to number portability and, more broadly, would encourage the regulator to adopt a greater focus on this longstanding issue.

As ever, ITSPA would welcome further dialogue with Ofcom on this important issue and calls for the area to feature as part of Ofcom's planned activity for 2018-19.