



Internet Telephony Services Providers' Association

ITSPA response to Ofcom Consultation on the Review of the General Conditions of Entitlement

Introduction

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.

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/>.

General Condition 18

Whilst ITSPA welcomes the opportunity to respond to the consultation on the Review of the General Conditions of Entitlement, our members are extremely disappointed by the Review's failure to make any substantive changes to General Condition 18. This development conflicts with what we initially understood from Ofcom following the announcement of this review as part of the wider Digital Communications Review.

Ofcom is well aware of ITSPA's position on the UK's system for fixed number portability, indeed our long-term desire for a complete overhaul of the fixed number porting system is set out in Ofcom's GC Review document. However, as Ofcom is also aware, the need for a long-term solution does not preclude short term improvements from being made. ITSPA had hoped that the GC Review would allow much-needed changes to GC 18 to be made. However, the document states that 'the onus remains, in the first instance, on industry to reach consensus.'

ITSPA's members are surprised that Ofcom remains wedded to this position of waiting for an industry-led approach given the repeated failure of these attempts over recent years. Following years of inertia on the issue, it is time for the regulator to take control of the situation. There are simply too many vested interests around the current process, meaning Ofcom's leadership is required. The UK's system for fixed number portability is simply not fit for purpose and lags behind our international counterparts. Fundamentally it is creating significant harm to consumers and hindering competition; two priority areas for Ofcom.

Whilst long-term reform is required, the General Condition Review was an opportunity to take immediate action on specific pinch points in the current process. As previously expressed to Ofcom, ITSPA believes



Internet Telephony Services Providers' Association

that the inclusion of clear timescales around providers establishing porting agreements would have been a suitable measure at this time.