



## **Internet Telephony Services Providers' Association**

### **ITSPA response to Ofcom's Proposed Annual Plan 2016/17**

#### **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 Ofcom's Proposed Annual Plan for 2016/17. We continue to work with Ofcom on various issues, including its own review into Digital Communications and their proposed recommendations, the current industry mergers, number range allocation, net neutrality, telecoms fraud, nuisance calls and the various other industry issues that crop up on a regular basis. We have used this opportunity to respond specifically on the issue of number portability, which we feel needs a re-focus in the 2016/17 period.

Please note that certain aspects may not necessarily be supported by all members of ITSPA.

#### **Number Portability**

As ITSPA has previously set out to Ofcom, both in face-to-face meetings and in our response to the Digital Communications Review, our long-term belief is that the porting system needs a complete overhaul in line with other countries who have developed a far superior system in both managing numbers and routeing calls.

In the interim, there are currently serious and clear problems that are creating significant harm which urgently need to be resolved. Our members do state that, where the parties in Number Portability are sensible and co-operative and follow the process, even though it is extremely inefficient and cumbersome, it "kind of works", providing everyone does their job correctly. Unfortunately, too often this does not happen. The problems stem from where the processes, or the regulation (or even the spirit of the regulation) are not followed – be that because technology evolves and the industry working group lags behind, or because of outright abuses. Currently, General Condition 18 is not sufficiently clear and ITSPA welcomes the announcement, as part of the Strategic Review of Digital Communications, that Ofcom have begun a comprehensive review of the General Conditions. This review, accompanied by more support in enforcement where it is not followed, could go a long way to fixing many of the issues our members face.

ITSPA hopes that Ofcom will consider a long-term solution to Number Portability as part of its programme of work for 2016/17 that would bring the UK up to speed with other countries around the world. Switching already forms part of Ofcom's key priorities and it is time that this problematic aspect of the process is resolved. This issue falls directly within Ofcom's statutory obligations to support the consumer and can no longer be overlooked and despite the failed attempts to resolve the problem in the past.

As ever, representatives of ITSPA are more than happy to discuss this issue in more detail.

(CC: Chris Taylor, Director of Consumer Policy, Ofcom)