



**Document Ref.: ICTA/03/08**

**Response to the Public Consultation Document - Guidelines for  
Implementation of 8-Digit Numbering Plan for Mobile Services in Mauritius  
Scheduled at latest by the 1st November 2009 (*Ref. ICTA/02/08*) - and Conclusion  
of the ICT Authority**

## 1. BACKGROUND

In view of the implementation of an 8-digit Numbering Plan for the Republic of Mauritius, the ICT Authority issued on 29<sup>th</sup> September 2008 a public consultation paper entitled “*Guidelines for Implementation of 8-Digit Numbering Plan for Mobile Services Scheduled at latest by the 1st November 2009*”.

The consultation document which *inter-alia* explained the implementation issues that had hitherto delayed the migration to 8-digit numbering plan, also presented as a solution, a two-phased approach to this migration. As detailed in the said document, the first phase of this migration will involve mobile numbers only; with the second phase involving fixed line numbers, including toll free and special numbers. The consultation document also proposed a roadmap to assist stakeholders in the forthcoming migration of mobile numbers to 8-digits.

The ICT Authority invited views and comments on the issues raised in the consultation document until 22<sup>nd</sup> October 2008. This deadline was thereafter extended to 11<sup>th</sup> November 2008 for those who did not respond within the initial deadline. Two responses have been received by the Authority.

The ICT Authority hereby provides a summary of the contributions received along with its comments; on the basis of the said contributions the decisions of the Authority are herein published.

## 2. SUMMARY OF STAKEHOLDERS' COMMENTS

### 2.1 Two-Phased Migration Approach

One contributor, which stands against the proposed “two-phased approach” for migration to 8-digits, pointed out several arguments in favour of a single-phased approach. The latter proposed that migration of fixed numbers be done in a hard cut-off mode at the same time as mobile numbers.

The contributor considered that no major difficulty will arise with a single-phased migration, in as much as the country had in the past changed its numbering system from 6 to 7 digits without difficulty.

According to the latter, it will be confusing for customers, especially for those calling from abroad, to remember that the number of digits for fixed and mobile numbers is different.

It has also been submitted that the two-phased migration will be more difficult for an “integrated fixed-mobile” operator in the latter’s communication campaign. The contributor considered that two communication campaigns on the same issue will inevitably cost more, and further concluded that the two-phased migration will double the costs involved in changing the numbering plan for Mauritius.

*The Authority maintains that, in accordance with good practice and in the benefit of consumers, numbering change in a hard cut-off mode is never recommended. It is also to be noted that at the time of migration from 6 to 7 digits in the year 1989, the customer base was very small (around 50,000) compared to the present customer base. Moreover, at the time of the said migration, only one telecom operator was involved in the numbering change.*

*With regard to the possible confusion of customers pertaining to the difference in number of digits between fixed and mobile numbers, the Authority considers that same will be dissipated, due to the fact that mobile numbers will have a specific leading digit. Hence, it will be easier for customers to remember that all numbers starting with digit ‘5’ are mobile numbers and hence 8-digits. For those calling from abroad, it is expected that announcements during the different stages of the parallel running coupled with proper communication of the numbering change to international administrations will help dissipate any confusion.*

*The Authority is also of the view that given the incoherence of the current numbering plan, it is already difficult for callers to differentiate between fixed and mobile numbers in certain number ranges where they are interspersed. Therefore by having a single-phased migration it will be more confusing for callers to remember which leading digit to add to which number.*

*As regards the argument that an operator will have to incur higher costs for communication campaigns, the Authority recognises that an operator will need to have two communication campaigns in the two-phased migration. However, it is to be noted that there will be a significant lag between the two phases, which could be a minimum of one year. The*

*Authority will also play an active role in educating the general public about the numbering change.*

*The Authority would also like to point out that the “integrated fixed-mobile operator”, as mentioned by the contributor, is not defined under the ICT Act 2001 (as amended). In case the contributor is referring to an operator which offers both mobile and fixed services, then it is to be noted that under the current licensing regime there are two distinct licences for mobile and fixed services respectively. Moreover each operator, whether mobile or fixed or both, will have to convey basically the same information to its customers.*

## **2.2 Cost Implications of Migration to 8-digits**

It has been submitted that, in relation to paragraph 5.0 of the consultation document, the cost implications of the migration to 8-digits have been underestimated by the ICT Authority. The contributor pointed out the different modifications required in terms of terminal equipment, directories, stationeries, advertising materials, communication campaigns, etc.

The contributor considered that a mechanism for costs should form an integral part of the migration plan. It has also been proposed that the ICT Authority fund the migration exercise, for example, through exemptions on payment of licence fees.

*The Authority has provided a general checklist in view of the numbering change, taking into consideration the input provided by operators some time ago. However the Authority is aware that the modifications/changes required by each operator may vary. It is expected that each operator will take necessary measures at its end to make the required changes and inform the Authority accordingly for inclusion in the checklist.*

*It is a fact that any major numbering change is implemented at high costs for operators. By summarizing the implications of the numbering change, it was not the intention of the Authority to ignore the cost implications.*

*It is believed that a numbering plan change is carried out for the benefit of the citizens as a whole and that each stakeholder has to bear part of the costs related to the change. Indeed operators will have to bear costs related to changes to be effected on their respective networks and to their specific information campaigns; consumers will have to bear the costs of changes to their CPEs and stationeries. The Authority on its part has already incurred significant costs in implementing its function under the law related to the review of the numbering plan. Furthermore, the Authority will undertake an aggressive campaign prior to the event.*

## **2.3 Number Portability Issue**

Contributors expressed that, though number portability may be facilitated with the implementation of the 8 digit numbering, the possibilities of number portability and its implications must be discussed in further depth before the implementation of the same.

It has been pointed out that, in determining the type of number portability to be implemented, due consideration should be given to the various types of networks; the wide difference in QoS offered by operators; and the migration towards VoIP.

***The Authority takes note of the points highlighted by respondents with regard to the implementation of number portability. The Authority wishes to reassure stakeholders that implications of number portability, which is a very pertinent issue in a competitive environment, will be subject matter of further public consultations that will be held in due time.***

## **2.4 MVNO Issue**

It is the opinion of one contributor that, the possibility of opening networks to MVNO would be detrimental to long term stakeholder, given the current market condition of Mauritius which serves a small population,

***The Authority takes note of the qualm of the contributor with regard to the possible introduction of MVNOs in Mauritius. However this issue will be studied by the Authority and will be discussed with stakeholders in due time within the broader context of furthering the competitive safeguards in the market.***

## **2.5 Numbering Policy for the new Numbering Plan**

One contributor considered that the numbering policy for the 8-digits Numbering Plan should be made clear by the ICT Authority. The contributor submitted that the Authority should provide clarifications as to how it intends to manage different type of numbers within the new Numbering Plan. The stand of the Authority as regards branding of operators with the allocation of number groups to operators has also been requested.

***Prior to the implementation of the new Numbering Plan, the ICT Authority will issue a National Numbering Guidelines document, which sets out detailed rules governing the management and use of numbers in Mauritius by any relevant stakeholders, including the administration of the Numbering Plan by the Authority. The drafted guidelines will initially be made available for public consultation. Any issue pertaining to the management of the numbering scheme will then be addressed.***

## **2.6 Provisions of the Guidelines**

It has been proposed that the guidelines at paragraph 8.0 of the consultation document to include details of actions required by operators, details on the communication campaign and the schedule of changes required (technical, operational and administrative).

With regard to announcement during stages 1 and 2, it has been submitted that the guidelines should clearly state which operator (whether originating or terminating) should provide the announcement.

Contributors also submitted that there is no clear provision in the guidelines with respect to treatment of numbering for SMS and prepaid Top-Up services during the first two months implementation period.

One of the contributors also requested guidance as to whether the Global Title of the telecommunications network is likely to be affected by the numbering change.

The following were also proposed to be part of the guidelines:

- Templates to be used for information to foreign administrations;
- coordinating body be set up by the Authority to oversee the implementation activities in a well defined process.

*The issue of provision of announcement was raised in a previous brainstorming session involving access providers and the Authority. It was proposed at that time that the access provider originating the call should provide announcement. The Authority is however of the view that it may be more practical if the terminating access provider provides that announcement. This is however subject to the technical capabilities of the different networks and may be finalized only after further discussion with stakeholders. The Authority notes however that no objection has been raised with regard to the provision of announcement either by the originating or terminating party.*

*Regarding the impact of the numbering change on the Global Title of telecommunications networks, it is to be noted that this issue was also raised in the abovementioned brainstorming session. It was advised at that point that the Global Title (GT) as well as the Mobile Subscriber Roaming Number (MSRN), being not customer-oriented, there was no obligation on operators to effect any numbering change on same. However, after confirmation with their suppliers, operators indicated that the MSRN needed to be changed to 8-digit format but that no change was required for GT.*

*For SMS and Top-Up services, the Authority is of the view that parallel run should be applicable for these services also, so as to avoid confusion to the public.*

*The Authority takes note of the template proposed by the contributor for conveying information to foreign carriers. Same will be included in the guidelines. The proposal of setting up a coordinating body to oversee the implementation process is also noteworthy.*