



National Information & Communications Technology  
Authority of Papua New Guinea  
PO Box 8222  
Boroko  
NCD



BY: OCEO / FS  
Ag EA

2 February 2017

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DEIA  
For your attention  
CEO  
7/2/17

Dear Sir

**RE: ADDITIONAL RESPONSE TO NICTA CONSULTATION ON THE DISCUSSION PAPER ON NUMBER PORTABILITY**

Bmobile:Vodafone thanks NICTA for the opportunity to add further submissions to our 8<sup>th</sup> December 2016 submission. This further submission aims to provide international context around the progression and implementation of Mobile Number Portability (MNP) that we believe NICTA needs to consider.

We ask that NICTA reflects on this additional Number Portability context with respect to how it will manage the smooth and rapid progression of MNP in PNG; and more especially how it will manage the PNG operators, i.e. Digicel and bmobile:Vodafone, to ensure they fully engage and do not prevent the introduction of Number Portability into the PNG market in the shortest timeframe possible.

Additional Context for NICTA to Consider

In looking at other countries where MNP has been introduced we have found patterns of behaviour where operators in certain countries have deliberately stymied their regulator to slow down and in some cases prevent the introduction of MNP.

We ask that NICTA therefore fully acknowledges international examples where it is clear that a dominant operator in a country has invested their time in preventing the regulator from, for example, progressing MNP by seeking to delay consultations taking place or prolonging consultations when they do take place.

NICTA should therefore request its international consultants to provide examples of best practice with regard the implementation of MNP and, more especially, examples of bad practice where a regulator has not effectively managed its operators (dominant or otherwise). We note that the Discussion paper did not cover this and as such we feel that the discussion paper was the poorer for it.

Of particular focus for NICTA should be countries where Digicel operate, e.g. Jamaica, Cayman Islands, Trinidad & Tobago, French Guiana, etc., as these will provide clear examples of how Digicel will engage with NICTA with regard NICTA's programme for implementing MNP in PNG.

Examples of bad practice that NICTA should ask its International Consultants to comment on include:

- What is Digicel's general corporate stance on MNP. Does Digicel embrace MNP or does it

- generally see MNP as a cost and hindrance in the markets it operates in?
- In markets where Digicel is the dominant provider has it ever tried to prevent MNP being introduced by requesting more time to meet an agreed date or deliberately not meeting an agreed delivery date?
  - In markets where Digicel is not the dominant operator has it ever tried to prevent MNP being introduced because it would enable new entrants to more easily reduce Digicel's market share?
  - Where Regulators have not effectively managed their MNP programmes has Digicel ever taken advantage of this weakness in programme management?
  - Has the use of external MNP consultants supported Regulator's in better managing bad operator practice to enable MNP to be implemented to plan.

Once NICTA has gained responses to these questions from its International Consultants, and made the responses available to all stakeholders, we believe it will ensure clarity, with regard how NICTA must manage its MNP implementation programme to ensure that all PNG operators clearly understand what is and what is not expected.

If anything in this additional submission is not clear, or NICTA is unsure about its relevance in respect to the the Consultation, then I would be happy to discuss this letter with you to ensure the foundations for successfully implementing MNP are correctly laid.

Yours faithfully,



**Sundar Ramamurthy**  
**Group CEO**  
bmobile-vodafone