

Mr. Kila Gulo-Vui
Chief Executive Officer
National Information and Communication Technology Authority
P.O. Box 8444 BOROKO
National Capital District 111
Punaha ICT Haus
Frangipani Street, Hohola NCD.

Dear Mr. Gulo-Vui,

Subject: Public Consultation on the Proposed Business Rule for Mobile Number Portability Phase 2

We thank NICTA for giving us the opportunity to submit our comment on NICTA's Public Consultation on the Proposed Business Rule for Mobile Number Portability dated 29th April, 2024.

Telikom appreciates the need for number portability to be a driver of competition in the communications services market and allow for customer choice in service providers among other benefits.

Telikom however considers that the introducing fixed number portability (FNP) at the same time as mobile number portability (MNP) may be premature at this stage. We propose that FNP be not implemented together with MNP but at least 5 years after MNP is fully operational. We further request that NICTA conducts a separate study on the possibility of FNP given the associated technical, regulatory and operational issues that need to be considered in the current PNG market and industry.

Telikom welcomes continued dialogue with NICTA and stakeholders in the industry on number portability.

Yours sincerely
TELIKOM LIMITED



Amos Tepi
Chief Executive Officer





Telikom Limited

Response to NICTA's Public Consultation on the "PROPOSED BUSINESS RULE FOR MOBILE NUMBER PORTABILITY" PHASE 2

Friday 31 May 2024

TELIKOM LIMITED

Public Consultation on MNP - Phase # 2

Telikom Limited (Telikom) appreciates the invitation and is therefore pleased to participate in NICTA's Public Consultation on Mobile Number Portability Phase 2.

Telikom notes the responses of stakeholders and NICTA's views in the Report of NICTA public Consultation on the Business Rule on MNP of October 2023 (which is captured in the discussion paper for this MNP Phase 2 public consultation).

The following are Telikom's brief notes to some of the issues highlighted in the Public Consultation on MNP Phase 2 discussion paper (Discussion Paper).

1. Question 12 – porting times

The Discussion Paper (section 3.12) refers to a paragraph (number 2) of Telikom's response with regards to porting times. The comment in that paragraph was on the assumption that porting time may be allowed for certain periods of time within which the porting is to be effected; i.e. minimum and 'maximum' time period limits. The comment is simply suggesting that customers could be encouraged to make advanced porting requests ahead of this 'maximum' time period if they need to.

2. Fixed Number Portability (FNP)

Question 20 - *Are you in favour of introducing Fixed Number Portability (FNP) in PNG and if you are would you prefer it be implemented in parallel with MNP or separately? Please provide your comments and views regarding your preferred approach.*

The discussion paper tabulated countries that have not yet deployed FNP after having launched MNP for several years already; i.e. 50% of countries in the Asia Pacific markets and 61 % in non-Asia Pacific countries as tabulated. There are also several countries that have launched FNP some time after MNP was launched in their markets and that some countries have simultaneously launched both MNP and FNP.

The NICTA discussion paper seems to highlight a one-sided view which strongly supports the proposition to launch both MNP and FNP simultaneously citing those countries that did. The reasons why those countries that did not allow FNP to be launched in their respective markets are not provided to give a balanced assessment.

Telikom considers, the argument implied, that because there exists a duopoly of sorts in a few countries that launched FNP and MNP simultaneously so this can be done in PNG, seems insufficient to support the proposition. Fixed line telephony infrastructure hence number utilization in some of the countries mentioned (eg. Telecom Malaysia¹) are greater compared to number utilization in PNG. It should also be noted that there are also some competitions in the fixed line telephony market whereas in PNG, Telikom is the only provider of fixed

¹ [Public-Consultation-Report-Implementation-of-FNP-in-Malaysia.PDF \(mcmc.gov.my\)](https://mcmc.gov.my/public-consultation-report-implementation-of-fnp-in-malaysia.pdf)

telephony services using geographic numbers nationwide; and taking into consideration the large differences in number utilization compared to mobile telephony service hence any regulatory intervention should be applied with caution such that the fixed line telephony market is not affected adversely. In comparison, the case for MNP in this regard is now asserted hence the mobile telephony service market is deemed ready for MNP to be implemented.

Telikom therefore considers that the funds that may be used for a desired FNP service, should be used on the fixed line telephony service/infrastructure; and that regulatory attention should be levelled more at mobile and broadband services.

In conclusion Telikom appreciates that customer preferences in switching of operators hence mobile and fixed number portability services is a way of enhancing and improving the level of competition which could also work in favor of the providers of fixed line telephony service providers. However, Telikom prefers that FNP should be delayed by at least 5 years from the launch of MNP to allow the implementation of MNP to provide the experience for all stakeholders to prepare for FNP and to avoid any detriments to the fixed service market and players.

3. Paying for Initial Set-up NPC Costs

Question 21 - *It is proposed that the initial set-up costs incurred by the centralized MNP clearing house platform provider are simply shared equally amongst the licensed mobile network operators at that time. Please provide your comments and views regarding this proposed approach.*

Telikom supports in principle the idea that the initial set-up costs of MNP Clearing house platform should be shared.

4. Paying for Invoiced Ongoing Costs incurred by NPC

Question 22

Would you prefer that ongoing costs incurred by the NPC provider are invoiced based on actual usage, shared equally or some other basis (please specify)? Please provide your comments and views regarding your preferred approach.

Telikom suggests that the ongoing costs incurred by the NPC should be based on “actual usage”.

5. Cost Benefit Analysis

Question 23

Are you in favor of NICTA updating the cost benefit analysis undertaken during the initial consultation process in 2017? Please provide your comments and views regarding your preferred approach.

Telikom prefers that NICTA updates the CBA undertaken in 2017. The obvious reason for Telikom is that Telikom has restructured since then and the costs identified then have changed.