

4 August 2021

Tristan Gilbertson
Telecommunications Commissioner
PO Box 2351
WELLINGTON 6140



By email: regulation.branch@comcom.govt.nz

Dear Tristan

Number Portability: Initiating determination process for designated multinetwork service determination for number portability.

1. Introduction

- 1.1 Thank you for your letter dated 23 July 2021, which outlines the process the Commission intends to follow to renew the Designated Multinetwork Service Determination (“Determination”).
- 1.2 The TCF is the telecommunications sector’s industry body and has a vital role in bringing together the telecommunications industry and key stakeholders to resolve regulatory, technical and policy issues for the benefit of the sector and consumers. Its members represent 95% of the sector.
- 1.3 In relation to number portability, the TCF assists industry by overseeing and coordinating the operational aspects of number portability. This includes:
 - Day-to-day management of the Industry Portability Management System (IPMS).
 - Facilitation of the Number Portability Users Group (NPUG). NPUG meets fortnightly and its members are staff that sit within companies who provide a technical operational role in relation to number portability. NPUG deals with any technical or process operational issues that arise and works swiftly to resolve them.
 - Facilitation of the Number Portability Regulatory & Policy Group, which focus on the policy aspects of number portability.
 - The 2FA Working Party which is working as a cross-functional group to implement specific measures to mitigate fraud.
- 1.4 The TCF has worked with the Parties to the Determination who are members of the TCF to prepare this response, and they support this submission.

2. Comments on reasonable grounds to initiate the review process

- 2.1 Recognising that the current Determination is due to expire on 19 December 2021, we agree that there are reasonable grounds for initiating the process for making a Determination.

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2.2 We support the rationale as outlined by the Commission in its July letter. It is important for the efficient and consistent provision of service to end users that all providers use the same process and platform to participate in number portability.

2.3 The TCF believes it is particularly important that any regulatory uncertainty regarding the regulated status of number portability is removed to ensure consistency in the provision of the service and that the principles regarding the cost allocation mechanism are upheld.

3. Comments regarding fraud mitigation

3.1 Given the work of the 2FA Working Party and an increasing focus in the industry on fraud and security issues, we would recommend that the Commission takes the opportunity of this review to include some commentary in the Determination review regarding fraud mitigation.

3.2 At a principled level we believe it would be advantageous for the Determination to include a requirement on Parties to the Determination to participate and comply with any fraud prevention measures that industry agrees on.

We thank the Commission for the opportunity to comment on this matter.

Yours sincerely



Clare Dobson
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