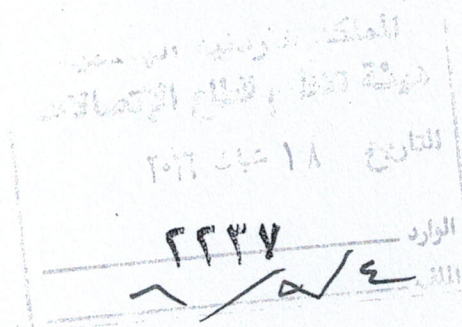




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H.E. Chairman of the Board/CEO
Telecommunications Regulatory Commission
P.O. Box 850967
Amman 11185

Our ref: 6/19/15/11/ 935
Amman, 17/2/2016

Subject: Zain Request to Modify the NNP

Your Excellency,

With reference to TRC letter No. 4/17/1/518 dated 18/1/2016 regarding the above-mentioned subject, and without prejudice to our request addressed to TRC by our letter No. 6/19/15/11/417 dated 21/1/2016, kindly find below Jordan Telecommunications Company (Orange Fixed) comments and concerns on the Zain's request of NNP modification:-

1. In the National Numbering Plan (NNP), separate numbering ranges have been used in order to distinguish mobile telephony services from fixed telephony services as following :
 - A. Mobile numbering capacity are allocated with the code (07) followed by eight digits (length of Subscriber Number is 10 digits including prefix 07), the allocation in blocks of (1,000,000) numbers for mobile networks operator(MNOs).
 - B. The codes 02, 03, 05 and 06 have been designated for the four regions and allocated to the Operators offering **fixed / geographic services** in these regions. Each of these codes is followed by a standard-length Subscriber Number (SN) of seven digits, where the numbering capacity for fixed services are allocated in blocks of (10,000) numbers, length of customer number for fixed services is nine digits including the prefix.

Based on the above, the request does not explain or show what will be the length of Subscriber Number (SN) in the mobile numbering sub range that will be allocated for Fixed Geographic services, and

what is the numbering capacity in blocks that will be allocated for fixed services from the mobile numbering sub range.

2. There is no solid justification behind such request, as there is no shortage of available geographic numbering capacity designated for fixed services, which means that there is still sufficient free numbering capacity designated for Geographic fixed services. Therefore, no need for such NNP modification.
3. The demand for allocating numbering capacity for mobile services (in the range 07) is more higher than the demand for allocating numbers for fixed geographic services. Implementing this request will cause a shortage in the numbering (scarce resource) capacity designated for mobile services, especially in light of the new mobile broadband services launched in the market. Therefore the request should consider the future availability of mobile numbering ranges and the expected high demand on allocating additional mobile numbering ranges for mobile services.
4. The current NNP designates 4 geographical regions in the Kingdom with National Designated Codes (NDC) (02,03,05, and 06) for fixed/Geographical services that are structured in the format (Prefix ABCxxxx) with meaningful geographic significance for the users, the request does not indicate how the mobile numbering sub range will be designated to each region (Greater Amman, Northern, Mid and Southern region).
5. Zain request does not show the specific amendments that are needed to be considered in the NNP, does the request focus mainly to allow only the mobile licensee to use specific mobile range from what they have to be used for fixed services? or any licensee will have the right to apply for such new ranges to be used for fixed services? in all cases, the amendment should consider the discrimination between the licensees that are permitted to provide mobile services and can apply for the allocation of such ranges with the other licensees not having the permission to provide mobile services; noting that the fixed service provider licensees (other than mobile operators) do not have the right to provide mobile services or to apply for the mobile numbering ranges.
6. In accordance to article 3.1 of the TRC Instructions on the Sharing of USO Costs, as it should be applicable from the start of operations of any Public Switched Voice Service in competition with JT, the TRC should consider the necessary of applying the methodology for sharing of USO costs and to compensate the USP for the material competitive disadvantage arising from its Universal Service Obligation.

In addition to the above, the TRC should assess the impact of the requested modification in terms of the complexity of implementation, the cost that will be incurred by the national licensees and the international carriers, and the potential harm to local and international operators, in addition to the hazard to consumers welfare, as below:

I- Operational issues

Using mobile sub block for fixed services would raise potential concerns including:

Wholesales charging and billing:

- The current numbering plan, analysis of the prefix '07' is sufficient to distinguish mobiles services and fixed services (02,03,05 and 06). By requested amendment, there will be a need to analyse, at least, four more digits after the '0 7' (depending on the block size of the sub ranges) in order to identify fixed numbers and apply relevant termination tariffs.
- In order to perform interconnection charging, operators will have to modify and upgrade their wholesale billing platforms, and Network Termination Point with its related additional costs to implement such changes.
- Breakdown of the allocated ranges in the capacity (07) into sub-ranges will complicate the routing tables in the networks (more digits analysis required to identify the call destination) to differentiate between the associated services.

Emergency calls:

- Emergency Call Center can currently make an immediate distinction between fixed and mobile calls based on the format of the calling number. This is extremely important because the procedures to retrieve the location and identification of the calling end-user are different depending on the service domain of the calling number.
- By the above requested amendments on the NNP, routing emergency calls and retrieving the callers information by the Emergency Call Center will be more complex when calling number is Zain fixed network.

Non geographical numbers:

- For calling non geographical numbers, the calls are routed via translation to long format based on the calling number originating the call (mobile/Fixed) which is identified by the prefix of the calling numbers, the

requested modification will be added complexity and cost for premium-rate numbers.

Call routing:

- Breakdown of the allocated ranges in the capacity (07) into sub-ranges will complicate the routing tables in the networks to differentiate between the associated services, and will require more digits to be analyzed to determine the right destination, which will increase the call set up time.
- Routing outgoing calls from Orange PSTN local switches to the Zain's new sub blocks will require Orange's local switch to analyse at least 6 digits '07 AB CD' in order to route the call to the relevant fixed interconnection point, instead of the first 2 digits (07) for the current mobile interconnection point. Thus, all routing table will need to be upgraded consequently.
- Rating outgoing calls from Orange PSTN switches to the Zain's new sub blocks will require Orange's rating systems to analyse at least 6 digits '07 AB CD'.
- For geographic services within a Governorate, fixed line subscribers can make calls to geographic numbers within the same numbering region without having to dial the area code, this is because the call routing is handled by the local switch which is configured to be able to route calls on the subscriber number only. Callers from outside the area code must dial the destination area code prefix digits to determine the call destination., Zain's request will cause complexity on the current dialling plan and involve more processing at local exchanges, transit exchange, signalling points and cause delay in call routing, impacting the quality of service.
- IT reporting and billing systems at the operators will need a lot of adaptations to accommodate the new changes for splitting (07) numbers into mobile / fixed services.

International voice interconnection:

- Different international termination rates with the international carriers which are applied for fixed and mobile should be considered, as the terminated calls are classified as fixed or mobile based on the prefix.
- The requested NNP modification requires the international operators to update their International gateways in order to route correctly the new fixed sub blocks to fixed interconnection point in Jordan instead of mobile ones.
- It is not evident, that international carriers and foreign operators are willing to implement such complex change and to support this additional cost.

- The requested NNP modification requires the international roaming partners to update their routing tables and rules in order to identify the mobile sub-ranges.

II- Consumer protection

Regarding consumer protection, the requested NNP modification will have negative impact on consumer's welfare. Mainly in terms of the following:

Retail Tariffs transparency and visibility:

- When using mobile sub blocks for fixed services, calling party, is likely to ignore whether his call is destined to a fixed or to a mobile number and hence, calling tariff is not clear nor visible for all customers.
- Mixing services associated with numbering ranges in (07) range will have negative impact on the commercial offers provided by the operators to their customers (customer confusion) for the on-net bundles, off-net bundles to local mobile operators and the off-net bundles to fixed networks.

Geographical localization:

- The current NNP designates 4 geographical regions in the Kingdom with National Designated Codes (NDC) (02,03,05, and 06) for fixed/Geographical services that are structured in the format (Prefix ABCxxxx) with meaningful geographic significance for the users; by such NNP modification, consumers can no more identify easily, the localization of calling or called party. Keeping in mind that one of the main interest of geographical number services is the ability to recognize the region/city of its correspondent, just by looking at the tow first digits of the fixed number.

III- International practice

There is no international practice that the mobile numbering is used for the fixed purpose.

In light of what we received from TRC by the letter No. 1304/6/9/4/ب dated 10/2/2016 regarding the subject of telecom network and services Convergence, Orange Fixed would like to mention that the subject matter of your letter overrides the request of Zain stated in the TRC letter No. 4/17/1/518 dated 18/1/2016 (modify the NNP by permitting the allocation of sub range from mobile numbering ranges to provide geographic fixed services) to a subject of open dialling plans between fixed and mobile services using geographic and mobile E.164 numbers

in the context of fixed mobile convergence, where this subject needs a thorough study and impact assessment in terms of the following:

- The current asymmetric regulation in place that defines two different markets; the mobile market and fixed narrowband market, local and national calls, and asymmetric call termination for fixed and mobile networks, which are of the significance important to consumers as it provided a gauge for call costs where distance was a factor, i.e. local versus national level charges,
- The current asymmetric regulation on taxation for the two different markets, the cost of licensing spectrum, in the mobile market.
- Convergence could have an impact on the definition and scope of the current universal service obligations (USOs); as the development of Convergence requires the TRC to review the scope of USO obligations.
- The concerns and impact mentioned above should be considered; the wholesales charging and billing, Emergency calls, Non geographical numbers, Call routing, International voice interconnection, Retail Tariffs transparency and visibility, Geographical localization.

Based on above, and in the absence of strong reasonable justifications for Zain's request, or a need to expand numbering capacities designated for fixed services, and in light of no clear or specific modifications to the (NNP) and to the "INSTRUCTIONS FOR ALLOCATION AND RESERVATION OF NUMBER CAPACITY", as well as lack of the impact assessment of such request, Orange Fixed believes that there is no need for such modifications.

Yours faithfully,

Chief Legal, Regulatory and Sourcing Officer
Dr. Ibrahim Harb
Jordan Telecommunications Company- Orange



هيئة تنظيم الاتصالات

٥١٨

ف/١٧/٤/١

الرقم

التاريخ

٢٠١٦/١/١٨

الموافق

السادة

الموضوع: طلب شركة زين لتعديل
خطة الترقية الوطنية

إشارة إلى الموضوع أعلاه، تحيطكم الهيئة علماً أن الشركة الأردنية لخدمات الهواتف المتنقلة (زين) قد تقدمت للهيئة بطلب تعديل جزئية في خطة الترقية الوطنية المعتمدة حيث ينص الطلب على ما يلي:

"تعديل خطة الترقية الوطنية للسماح للمرخص له باستخدام النطاقات الفرعية من ضمن النطاقات الرقمية الخاصة بالاتصالات المتنقلة لتقديم خدمات أخرى من ضمنها خدمات الاتصالات الثابتة (Geographical services)"

وإشارة إلى المادتين (١٤) و(١٨) من تعليمات القواعد الإجرائية لإصدار التعليمات وتعديلها الصادرة عن مجلس مفوضي الهيئة بموجب القرار رقم (٢٠٠٧/٨-١) تاريخ ٢٥/٤/٢٠٠٧ والمعدلة بموجب القرار رقم (٢٠١٠/١١-٢) تاريخ ١٥/٦/٢٠١٠، فإن الهيئة تعلمكم بطرح طلب شركة زين للاستشارة لإبداء ملاحظاتكم (إن وجدت) وتزويد الهيئة خطياً بها خلال ٣٠ يوماً من تاريخ نشر الطلب على موقع الهيئة الإلكتروني الرسمي.

وستقوم الهيئة بعد ذلك بنشر الملاحظات الواردة بخصوص الطلب واستقبال الردود الخطية عليها خلال ١٥ يوماً من تاريخ نشر تلك الملاحظات. وسيتم بعد ذلك نشر الردود الواردة ودراسة الملاحظات جميعها من قبل الهيئة لاتخاذ القرار المناسب بخصوص هذا الطلب.

وتفضلوا بقبول فائق الاحترام،

رئيس مجلس المفوضين/

الرئيس التنفيذي

المهندس غازي الجبور

نسخة: الدائرة الفنية

نسخة: الدائرة التنظيمية/ للعلم