

18 June 2021

Independent Communications Authority of South Africa

Attention: Mr Lordwill Zwane
Per email: lzwane@icasa.org.za

Dear Lordwill

DRAFT NOTICE TO AMEND THE ORDERING SYSTEM SPECIFICATION FOR NUMBER PORTABILITY

1. ISPA refers to the Draft Notice to amend the Ordering System Specification (“the Draft OSS Amendments”) published for comment on 27 May 2021 and sets out its comments below.
2. ISPA welcomes progress in finalising the framework for number portability in South Africa.

Submissions

3. **Page 6, section 6.** We suggest the following amendment to the wording:

“26. Port Deactivated – Message 11

Once the DO has deactivated the geographic or non-geographic or Mobile Number(s) and updated its routing tables, the DO sends a Port Deactivated Message to the NNPDB within the Port Deactivation Time.”

4. **Page 6, section 9.** ISPA requests that timers be defined in terms of “calendar days” and not “calendar months” (i.e. the position under the 2010 Ordering System Specification). ISPA’s concern is that the use of “calendar months” leads to inconsistencies in process times and inconsistent consumer experiences.
5. **Page 10, section 10.** The diagram provided makes reference to “the MNPDB”, which term is not defined in the Draft OSS Amendments. ISPA suggests that the reference should be to “the NNPDB”.
6. **Page 11, section 15.** ISPA suggests the following amendments to section 15:
“15.1. Regulation 17 of the Regulations is hereby amended by the substitution for the heading “Port Response – Message 9” of the heading “Port ~~Response~~ Notification – Message 7”
7. **Page 12, section 16.** ISPA suggests the following amendment to section 16:
“Regulation 18 of the Regulations is hereby amended by the substitution for the heading “Port Response – Message 10” of the heading “Port ~~Response~~ Notification – Message 8”

8. **Page 12, section 19.** ISPA suggests the following amendment to section 19:

“Regulation 21 of the Regulations is hereby amended by the substitution for the heading “Port Response Activated – Message 13” of the heading “Port Response Activated Broadcast – Message 10”.

9. **Page 12, section 20.** ISPA suggests the following amendment to section 20:

“Regulation 22 of the Regulations is hereby amended by the substitution for the heading “Port Response Deactivated – Message 14” of the heading “Port Response Deactivated – Message 11”.

10. **Page 12, section 21.** ISPA suggests the following amendment to section 21:

“Regulation 23 of the Regulations is hereby amended by the substitution for the heading “Port Response Deactivated – Message 15” of the heading “Port Response Deactivated – Message 12”.

11. ISPA trusts that the above is of assistance and looks forward to the finalisation of this process.

Regards

ISPA Regulatory Advisors