

CARRIER PRE-SELECTION AND NUMBER PORTABILITY WITHIN THE BAILIWICK OF GUERNSEY – OUR 04/05

Introduction

Cable and Wireless Guernsey Limited ('C&W Guernsey') welcomes the detailed consultation that the OUR has presented to the marketplace and would like to thank the OUR for this opportunity to provide comments on the proposals.

C&W Guernsey is concerned that the most fundamental questions in relation to CPS and NP have not been asked. These questions are whether licensed operators in the market place still consider that CPS and NP are appropriate for the telecommunications market in Guernsey. The OUR seems to have prejudged the issue to a certain extent and C&W Guernsey considers that, in assessing such a fundamental proposal, it is important to continue to question the viability and merits of both CPA and NP in the telecommunications market in Guernsey. These are not only questions regarding likely demand, but also whether any perceived benefits are likely to outweigh the cost.

While C&W Guernsey accepts that the OUR has a duty to introduce, maintain and promote competition in the Bailiwick, it is important to recognise that this competition must be sustainable (as prescribed in the Telecommunications Law). It is very easy for OLO's to request services from C&W Guernsey without the slightest intention of ever requiring those services. Indeed, one operator has pushed for a number of services to be included in the reference offer and has never executed upon that document even though it has been signed since 12 September 2003 and discussions have been ongoing since the first quarter of 2003. This history of an inability or lack of interest to take up services offered by C&W Guernsey at considerable expense must be considered by the OUR in evaluating the costs that are likely to be incurred and the effect that this will have on the consumer in Guernsey. There is little point in acceding to the requests of certain OLO's and loading the implementation costs throughout the retail and interconnection prices if the OLO's are unwilling to deliver on the services that they have requested. This would not only fail to lead to sustainable competition but would also have an adverse impact on the prices that the consumers have to pay. In this light, C&W Guernsey considers that it is essential that OLO's are financially incentivised to only request services that they will actually use and deliver on. We have discussed a mechanism that is considered appropriate at a later stage in this document.

In order to assist the OUR in assessing the main issues highlighted in this document, the following points represent an executive summary of this response document.

- Carrier Selection service already launched by Wave – hence CPS not needed to exert downward pressure on prices.
- Market is too small to justify the cost of introduction of CPS. Full OUR cost benefit analysis would be expected to show this.
- Local conditions not right for introduction of CPS – relatively cheap telecommunications services (Oxford Economic Forecasting).
- If CPS were to be introduced OLOs should pay a contribution towards the start-up costs.

- The market for number portability is likely to be very restricted, hence the benefits are unlikely to outweigh the costs.
- If NP were to be introduced it must be reciprocal.

1. General Comments

1.1 Size of the Market and Likely Demand

C&W Guernsey completely supports the view expressed by the OUR in section 4.2 page 9 that the market in Guernsey is relatively small and it is important that measures adopted are proportionate to the level of demand. Furthermore, C&W Guernsey considers that if there are any potential benefits associated with CPS in Guernsey, then these should be maximised. However, it is vital that any associated costs must be at a level which is entirely proportionate to those benefits. The costs of implementation of CPS would be large and these have been detailed in Appendix 1 (confidential). C&W Guernsey would question whether this investment could not be better used to develop further products and services that are required by the Bailiwick now, rather than developing a potential for OLO's that may never be used. For this reason C&W Guernsey believes that before any commitment is made to the introduction of either Carrier Pre-Select (CPS) or Number Portability (NP) a full cost / benefit analysis should be undertaken by the OUR and the details of such an analysis should be made publicly available. The analysis should be carried out both from the viewpoint of the incumbent operator (C&W Guernsey) and each of the Other Licensed Operators (OLOs) that have expressed an interest in the services.

On the latter point C&W Guernsey is concerned that the level of demand that has been expressed by the OLOs might be misleading. Previous experience has shown that views can change within a relatively short period of time, as is demonstrated by the change in view on Wholesale Line Rental explained at the start of section 4.2. C&W Guernsey considers that it is generally irresponsible of OLOs to request services and technical developments when there is only a very limited intention to take up such services. The OUR must be mindful of this situation in reaching a decision on the benefits of CPS in the marketplace to maintain **sustainable** competition. A solution that would seem to address this concern would be to require an upfront payment to be made from all OLO's, part of which would be repayable if the OLO did take up any potential service and had a threshold number of customers using that service (e.g. initial payment of £100,000 of which £50,000 is refunded once certain criteria have been met). However, C&W Guernsey is not inclined to develop a CPS service because it has been requested by OLO's who then do not really want to execute upon that service. The only group that would suffer ultimately would be the customers.

In 4.3 the OUR states that "In order to reduce overall costs these processes (operational) would preferably be managed through e-mail exchanges or other communication methods which are manageable given the limited scale of the likely throughputs and this is also considered further" (underlining added). Hence the OUR appear to accept from the start that the take up of either CPS or NP is likely to be low, immediately throwing into question their likely viability. This would seem to represent a problem in the analysis that has been conducted to date. An investment in

CPS which is only likely to lead to a 'limited scale of the likely throughputs' would seem to be unnecessary and disproportionate for the scale of the market in Guernsey.

1.2 Carrier Pre Selection – The Context

Benchmark countries have been chosen by the OUR that have implemented both Carrier Selection (CS) and CPS. OUR 04/05 provides no information on those countries that have implemented only one or neither of the services. Furthermore, the markets in Spain, France, UK and Denmark are entirely different to that in Guernsey, not least because of their size and the number of competing operators in each jurisdiction.

Very little detail is given in the consultation paper about the cost of implementation of CPS, which is understandable given that the cost of the switch upgrade in particular has not previously been available. It has already been stated above that a full cost benefit analysis should be carried out in order to assess the financial impact on the market. Costs should include such things as the impact on processor utilisation, IT, billing and bad debts. Other markets have experienced problems with customers migrating to the CPS of another operator leaving behind a trail of bad debt.

The quote from the EU directive mandating CPS given in section 5.5 of OUR 04/05 says that direct charges to customers, if any, must not act as a disincentive. It should be noted that C&W Guernsey is explicitly prevented from charging customers any fee or requiring they acquire any special equipment as a pre-requisite of obtaining Equal Access (CS or CPS), under Condition 24.2 of its Licence. Hence, the telecommunications law in the Bailiwick is more prohibitive on the incumbent than the requirements of the EU directive. C&W Guernsey considers that the implementation of this provision could lead to an unfair position resulting from a decision that is disproportionate for the marketplace.

C&W Guernsey notes that the costs associated with CPS are identified under three headings:

- Fixed network and system set up and maintenance costs;
- Costs per operator to set up inter-operator processes; and
- Costs per line or per customer order.

The last two costs are clearly directly caused by the addition of a new operator and a new customer respectively. C&W Guernsey supports the view as implied in the consultation paper that these costs should be borne by the relevant operator and not by the incumbent operator. An up-front payment should be made by the specific OLO concerned.

However we strongly disagree that the causality of the cost of adding CPS functionality to the network (fixed network and system set up and maintenance costs) is less clear, or that it is a legal requirement rather than being in response to a request from any operator or customer. There is nothing in the Telecommunications (Bailiwick of Guernsey) Law, 2001 (the Law), or the C&W Guernsey licence, that mandates the introduction of CPS, unlike some countries. Rather one of the purposes of this consultation is to gauge the level of interest among Other Licensed Operators

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(OLOs) in CPS. The introduction of CPS (if that is the decision) would be as a direct result of the requests of OLO's in the marketplace. It is our understanding that if the other licensed operators express a need for the service this will influence the OUR decision to direct its introduction. Hence those operators should be forced to demonstrate their commitment by agreeing to pay for the installation of the functionality. In addition, that payment should be through an up-front fee. Recovery in the pence per minute interconnect rate for CPS calls is not acceptable to C&W Guernsey as it is possible that neither OLO would launch a commercial CPS service, resulting in C&W Guernsey carrying all of the financial risk. This is not a commercially viable option that C&W Guernsey will engage in.

Further, C&W Guernsey disagrees that all customer are likely to benefit to some extent if CPS is introduced. As is stated in the consultation paper, Carrier Selection (CS) is already available. Wave Telecom has launched its commercial CS service so, if there is to be a downward pressure on long distance call tariffs it is likely to be CS and not CPS that instigates the move. Hence, in our view it would be entirely inappropriate to spread the cost of CPS functionality over the call charges for all C&W Guernsey customers.

Given that Wave has only recently introduced its CS service into the market (albeit 6 months later than previously advertised), C&W Guernsey considers that it is inappropriate to consider the introduction of CPS at this stage. It would be wise to evaluate the uptake of CS and then to move to CPS if appropriate. To consider CPS at this stage fails to reflect the actual market realities that are currently occurring.

The consultation paper does not mention a pence per minute interconnect rate for CPS calls. The OLO would pay C&W Guernsey for all CPS calls originating on C&W Guernsey exchange lines, including the standard network elements of call origination plus the specific ongoing CPS operational costs. In many jurisdictions the incumbent operator is paid "fair compensation" for the costs associated with CPS. For example a local network charge could be used as an element of a fair compensation regime to facilitate effectively the rebalancing of rates. More is said about the rebalancing of tariffs in response to Q 1 below. If the viability of CPS is to be investigated further C&W Guernsey would be able to provide more information about the charging regimes in other jurisdictions.

Section 6.1 states "...if CPS is introduced after CS has been available for a number of years it may have less impact as a larger proportion of higher spending customers may already be using CS...For such customers there is unlikely to be much incentive to switch to a CPS solution." It is unclear whether this is being used as an explanation of why CPS should be introduced at this time. What it clearly shows is that CS is a credible alternative to CPS. It strengthens C&W Guernsey's argument that it should not be directed to introduce CPS when Condition 24.1 (Equal Access) requires that Users have the choice of either: CPS or CS. The relevant licence condition does not say that both choices must be available – rather it is expressed as an either... or option. If the licence condition had read 'both of the following ways:', then the OUR's interpretation would be correct. However, it is not phrased in this way and this is an issue that needs further consideration by the OUR.

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The consultation paper goes on to say "...CPS being more attractive in those countries having higher long distance and international call prices..." By its own admission, the OUR accepts that CPS is only really successful in these types of markets. Guernsey does not fall into this category. C&W Guernsey maintains that its national and international call charges are relatively low so the take up of CPS by customers is likely to be low also. Indeed, in a recent presentation given by the OUR at a vulnerable users workshop (Assisting Vulnerable Users – Role of Utilities in Guernsey) the following price comparison of telecommunications services in Guernsey was shown:

Telecoms¹

- 35% cheaper than in the UK
- 35% cheaper than in London

Since this research was completed further significant decreases in call tariffs have been introduced by C&W Guernsey. We have not carried out a full comparison of call charges, however from a quick review of operator web sites it is clear that call charges to some of the most popular international call destinations, such as Australia, are up to ten times more expensive than the rates charged by C&W Guernsey.

Net CPS benefits in Guernsey are listed in the consultation paper as:

- The potential savings for those additional customers who use CPS to change suppliers; C&W Guernsey comment - The customers most likely to benefit from CPS (incrementally over CS) are said to be residential users with average or above average call spends. Given the low cost of long distance calls, it is unlikely that significant cost savings would be achieved by residential customers. Moreover, the recovery of the cost of CPS over all calls would put an upward pressure on prices rather than down.*
- The potential savings for all customers, including those of the incumbent and those using alternative operators, through increased price competition brought about by the introduction of CPS; C&W Guernsey comment - If the launch of a commercial CS service does not have this impact it is difficult to see why CPS should. Indeed, early indications are that Wave will simply track the C&W Guernsey rate with a relative discount being applied. If this is the case and the costs of the implementation of CPS are loaded into the call costs, then this will simply increase the costs of calls to the consumer and additionally place C&W Guernsey at a further competitive disadvantage.*
- Cost savings resulting from not having to dial extra digits and the reduction in mis-dialling associated with CS. C&W Guernsey comment - It is difficult to imagine that this 'saving' would off-set the cost of introduction of CPS and C&W Guernsey considers that this is an irrelevant consideration in this context.*

¹ Source – Oxford Economic Forecasting Oct / Nov 2003

Only a full cost benefit analysis would show whether the introduction of CPS would be financially beneficial to the market as a whole and C&W Guernsey considers that it is imperative that such a study is done by the OUR if it is decided that the matter should be pursued further.

1.3 Number Portability – The Context

The consultation paper states that the demand for NP is primarily driven by the level of access competition, and C&W Guernsey fully supports this view as if an OLO has not built an access network it cannot have any directly connected customers. The OUR further states that NP is generally a reciprocal arrangement. C&W Guernsey considers that it is essential that, if it were to be introduced, it is reciprocal. It would clearly be a nonsense in a competitive environment, and would limit customer choice, if this barrier to entry was removed in one direction, but not the other. If NP were to be introduced it should be an absolute obligation placed on all licensed operators to have the functionality in place.

2. Response to Specific Questions

A. Carrier Pre-Select (CPS)

Q1 Do you consider that the call categories listed above are those that should be considered for introduction in Guernsey at this time? Please explain your response, and if appropriate suggest alternative or additional categories that should be offered in Guernsey.

Proposed categories are:

- International calls only
- National calls only (calls to UK, Isle of Man and Jersey fixed and mobile numbers)
- “All Calls” comprising of calls to fixed and mobile numbers within the Bailiwick, national calls, international calls and calls to non-geographic numbers within the UK numbering scheme.

C&W Guernsey does not agree with the proposed CPS baskets. If baskets are introduced that include solely international calls or national calls it will enable OLOs to cherry pick. This is potentially damaging as C&W Guernsey has not yet had the opportunity to re-balance tariffs, in particular the exchange line rental. While OLOs would take the more lucrative calls C&W Guernsey would be left with the loss making exchange line rental plus calls to such services as the Internet where margins are very low. In particular, bearing in mind the price control regime that is in place, if this were to happen the introduction of an Access Deficit Charge would have to be seriously considered to ensure C&W Guernsey would be able to recover its costs.

If CPS is to be introduced we suggest that there should be a single call basket. OLOs would then provide a more comprehensive service, which is technically simpler and, would be far easier for customers to understand given that the market is likely to be residential customers (Section 6.2). For example, people in the telecommunications industry know the difference between a geographic and a non-geographic number

CABLE AND WIRELESS GUERNSEY LIMITED

whilst it is generally accepted that lay people do not. A single basket would also be more in line with the UK, international practice (Section 6.4) and less costly for operators to implement. In a situation where it is highly debatable whether CPS is a proportionate measure to implement, it is important to consider all measure possible to reduces costs of implementation.

Moreover, the benefits and costs of increased choice, by the use of multi-baskets, fall unevenly. The benefits of increased choice would most likely accrue to sophisticated telecommunications users (particularly business users), who will be more inclined to use different operators for their national and international needs, while the costs of that increased choice would tend to fall on less sophisticated telecommunications users (such as residential customers) who would be more susceptible to being confused. It would be unfair, for example, to introduce CPS that increases banks' choice of operators at the price of confusing elderly customers. C&W Guernsey submits that the appropriate balance between simplicity or implementation and freedom of customer choice would entail a single basket of pre-selectable services.

The single basket would include international calls, calls to the UK and Jersey (both fixed and mobile terminated) and calls to non-geographic numbers.

The consultation paper does not explicitly state that some calls would be omitted. C&W Guernsey would suggest that calls to emergency numbers (999 and 112), to the operator (100), using CS services and fault reporting services (151) would be excluded, and possibly other similar categories of call.

We are also of the view that Telephone Assistance Scheme (TAS) customers should be excluded from the CPS service if it were to be introduced. C&W Guernsey provides a discount against the exchange line rental for TAS customers. If we were to lose the call income as well the financial impact on our business would be even greater. An alternative would be for OLO's to pay C&W Guernsey a contribution towards the discount given to TAS customers.

Q2 Do you agree that mandating a pre-dialler based CPS solution in Guernsey is not desirable? If you disagree, please explain your reasons and provide your explanation of why this option should be considered further.

C&W Guernsey does agree that a pre-dialler based CPS solution is not suitable for Guernsey. We are aware that some Bailiwick customers have had pre-diallers installed by third parties to provide them access to bypass services, such as that offered by OneTel. We have received complaints regarding the quality of service from customers that had forgotten they had them fitted. Obviously this solution is already available to Wave for use by its CS customers, should they wish to use the technology.

It should however be noted that pre-diallers are active and require a constant source of power. In a power cut customers would be left without service even though the PBX and network services (such as ISDN 30) would be working.

CABLE AND WIRELESS GUERNSEY LIMITED

Q3 Do respondents agree that the standard System X CPS upgrade is a realistic option for introducing CPS in Guernsey? If respondents disagree, then please provide reasons for this position.

BT uses the same make of switch as C&W Guernsey (Marconi System X), as is mentioned in Sections 5.4 and 6.5. However, the fact that BT is on an entirely separate upgrade path to other System X users is omitted. Hence the extensive use of the CPS functionality by BT should not be taken to mean that the upgrade that would be needed to C&W Guernsey switches is well tried and tested

It is highly likely that it is technically not possible for the call forwarding service to be compatible with CPS. One solution would be for call forwarding customers to be excluded from the category of customers to whom CPS can be offered. C&W Guernsey should not be required to disable the call forwarding service in order to meet a requirement to make CPS available generally.

Technical constraints may also render CPS incompatible with other kinds of services besides call forwarding, but C&W Guernsey may be unable to identify such services until the relevant software upgrades have been installed and testing of different traffic scenarios has been undertaken. In particular 1471 (last number dialled) and Ring Back When Free may be affected. The majority of customers may view the loss of these facilities caused by the introduction of CPS as a retrograde step.

The complexity is further expanded on in our answer to the next question.

Q4 What are respondents views on the costs and complexity of implementing the System X CPS upgrade on the existing two switches in the incumbent network in Guernsey? Quantitative data in response to this question would be very helpful and, if respondents consider this information to be confidential, it should be clearly marked so it can be treated as such.

C&W Guernsey has obtained a budget figure from its suppliers, Marconi, for the required upgrade to System X, which is shown in confidential Appendix 1. The upgrade of the switches is only part of the cost, however. If C&W Guernsey were to be directed to make CPS available to OLOs it would require changes to the Reference Offer, interconnect billing system, operational procedures and training all of which also have an associated cost. The fact that the upgrade would require a significant amount of data build work should not be overlooked.

There are additional factors, such as the impact on processors, concentrator signalling and general signalling that should be taken into account. The significance of these issues will depend on the volume of calls. It is highly likely that the C&W Guernsey processors would require upgrading, which in turn would force us to move to a new generation of products. This in turn has further operation and maintenance implications such as training. Hence in addition to CPS start-up costs C&W Guernsey could be committed to significant additional / deferred capex after a period of time as a direct result of the introduction of CPS.

We are advised by Marconi that the receiving switch (i.e. the switch operated by the OLO) also has to be upgraded with CPS functionality and their billing system would

have to be able to bill the customer, including simultaneous calls from the same CPS customer. It is up to the OLO's to comment on whether the benefits they perceive from the introduction of CPS outweigh the associated costs. However it is another reason why we believe it is essential that the OUR conduct a full cost benefit analysis.

As to the complexity introduced with the service, we have several observations to make. Responsibility for billing the customer for CPS calls rests with the OLO. If the CPS customer has diverted the call, the Last Diverting Line Identity (LDLI) needs to be made available to the OLO for charging to be correct. Inter-administration billing would need to be addressed. By definition any CPS call involves the call being presented from one network to another. Accordingly both networks will produce an INCA record for every such call. If the CPS customer has diverted the call, the LDLI needs to be made available to the OLO for the charging to be correct.

Additionally, as mentioned in response to question 3, features such as RBWF and 1471 may be a problem. They require the OLO to support LDLI and NEED protocols, otherwise the features will not work. Call barring is set independently – we are advised that there is confusion (at Ofcom) as to whether call barring takes precedence before the call is offered to CPS routing. We should appreciate clarification on the OUR definition of CPS and view on the standards that apply. As C&W Guernsey uses Marconi switches the software builds would be defined for the UK market and hence be compatible with Ofcom standards.

Q5 Do respondents agree that this solution (the Kingston Communications solution that does not use the standard System X CPS functionality) should be investigated for Guernsey? If respondents disagree then please supply reasoning for this.

If C&W Guernsey supported the view that CPS should be introduced, and we do not, it would be important to find a technical and operational solution that is proportionate to the size of the market. It is interesting to note that Kingston Communications use a solution that does not use the standard System X CPS functionality. We have no knowledge of the detail of this solution, and neither is any provided in the consultation paper. If Kingston Communications would be willing to share their solution with others, and CPS were to be considered further, it would be appropriate to explore this avenue further.

Q6 Do respondents agree that an Industry Working Group is the most useful means of evaluating the technical options for implementing CPS in Guernsey? If respondents disagree, then they are requested to provide reasons for this and to offer alternative means of evaluating the technical CPS options for Guernsey.

C&W Guernsey does not support the proposal that an Industry Working Group (IWG) should be set up. If CPS was to be pursued further, it would be the responsibility of C&W Guernsey to provide the service and all that entails. CPS would have to be introduced as a new service within the Reference Offer (RO). Participation in an IWG would give OLOs access to highly confidential information about the C&W Guernsey network, information systems and operational capability.

Whether C&W Guernsey were to participate in an IWG, or otherwise, the development of a CPS solution would take management time and resource which

would inevitably be directed away from focusing on the provision of other services to customers.

If an IWG were to go ahead the participants should be limited to those OLOs that are likely to introduce the service and C&W Guernsey. In any event it should not be convened until the results of the OUR cost benefit analysis are known. If the analysis shows that the service is not viable the IWG will not be necessary.

Q7 If respondents agree, views on the scope and timeframe (for the Industry Working Group) proposed are invited.

Without prejudice to our response to Q6, C&W Guernsey is concerned by the proposal as explained in the consultation paper. To say that the IWG should “*involve all operators interested in the introduction of CPS*” gives no comfort that OLOs will commit to taking CPS and launch a commercial service soon after it becomes available. Without such commitment an OLO may put forward a wish list and influence the decision regarding the technical solution and then walk away leaving C&W Guernsey to bear the cost.

The consultation paper only refers to the two operators, other than C&W Guernsey, that currently hold fixed telecommunications licences. We would appreciate clarification regarding the possible licensing of other operators in the future. In many other jurisdictions several operators have been awarded licences for the sole purpose of offering CPS. Indeed, recently customers in Guernsey have been contacted by an American company cold calling and offering CPS in an aggressive manner, not realising that Guernsey is not in the UK. We are sure it is not the intention of the OUR to open the floodgate to that type of operator and we assume that the application process will be as rigorous as that followed by the current licensees.

B. Number Portability (NP)

Q8 Do respondents agree with the general comments above on the potential demand for NP in Guernsey and with the scope of a potential NP service in Guernsey? If respondents do not agree, then they are requested to provide their reasoning for this and suggest alternatives.

It is interesting to note the variation in take-up illustrated in a graph in section 7.5. If Guernsey were to follow Spain's example only 1000 customers (4% of say 25,000 customers) would take their number with them when they change operator. Given the current stage of roll-out of OLO access networks even this number would seem high. This is supported in section 8.1 where the paper suggests that the market in Guernsey for NP would probably be limited to business users because they would be the only customers directly connected by OLOs.

That being said, if NP were introduced it should be done in a non-discriminatory way i.e. the technical solution should allow all customers that are capable of being directly connected to an alternative operator the opportunity to have NP. Not only should it be non-discriminatory in that residential customers are not excluded, but also not

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discriminate against certain businesses just because of the services they do or do not take.

As with CPS a full cost benefit analysis should be carried out before all telecommunications operators are required to invest in the introduction of NP.

Q9 Do respondents agree that an IN-based NP solution for Guernsey should not be considered at present? If respondents disagree then they are requested to present reasoning for their position.

C&W Guernsey does agree that an IN-based NP solution should not be considered at this time. The cost would be likely to be disproportionate to the size of the market. While IN costs are not available, certain other costs are shown in Appendix 2 (Confidential).

Q10 Do respondents agree that the call-back option could be a suitable NP platform for Guernsey? If respondents disagree, then they are requested to provide reasoning for their position.

The call-back option would require the functionality to be in the System X build and it would require increased signalling. It would be likely to be expensive per call, a cost that would have to be covered in interconnect rates.

Call-back functionality is not in the current build of C&W Guernsey System X switches. Indicative prices are provided in Appendix 2, which is confidential.

Q11 Do respondents agree that simple call forwarding could constitute a suitable NP platform for Guernsey and should be investigated further? If respondents disagree, then they are requested to provide reasoning for their position.

Simple call forwarding would also be expensive per call. In particular it would tie up trunk circuits and causes trumboning of calls across networks i.e. it make extremely inefficient use of networks. Indicative costs are provided in Appendix 2.

Q12 Do respondents agree that an Industry Working Group is the most useful means of evaluating the technical options for implementing NP in Guernsey? If respondents disagree, then they are requested to provide reasons for this and to offer alternative means of evaluating the technical NP options for Guernsey.

Unlike CPS C&W Guernsey believes it may be of benefit to set up an IWG as NP is a reciprocal service that will involve all operators. It is the nature of NP that all operators would have to implement the same technical solution. We would suggest that it may be appropriate for the OUR to attend at least some of the meetings as they could then satisfy themselves that all the technical options are being thoroughly considered.

It should be borne in mind that each operator, especially the OLOs, have limited resource. It is unlikely that they would be able to be a member of two IWGs at the same time. Even if IWGs were not introduced, if both CPS and NP are to be

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considered further it is strongly recommended that the work is done sequentially rather than in parallel.

As well as considering the technical solution the ongoing provision and maintenance of an accurate database should not be overlooked. The introduction of NP has ramifications that go far beyond the identification of a technical solution for provision of the service.