



29 May 2004

Office of Utility Regulation
Hirzel Court
St Peter Port
Guernsey GY1 2NH

Dear Sirs

Re Carrier Pre-Selection and Number Portability within the Bailiwick of Guernsey - Consultation Document No: OUR 04/05

We refer to the above consultation document and we align with the overall analysis of the potential requirements for these facilities that the OUR has articulated.

We are pleased to provide the following responses to the questions within the Consultation Document:

1. Scope of CPS in Guernsey

Q1 We agree that call categories listed (i.e. international calls only, national calls only and 'all calls', which includes calls to fixed and mobile numbers within the Bailiwick, national calls, international calls and calls to non geographic numbers within the UK numbering scheme) are those that should be considered for introduction in Guernsey at this time.

Q2 We agree that mandating a pre-dialler based CPS solution in Guernsey is not desirable.

Q3 We agree that the standard System X CPS upgrade is a realistic option for introducing CPS in Guernsey.

Q4 We do not have sufficient data on the costs and complexity of implementing the System X CPS upgrade on the existing two switches in the incumbent network in Guernsey to comment.

Q5 We agree that a switch based solution not using a standard System X upgrade (similar to that adopted by Kingston Communications) should be investigated for Guernsey.

Q6 We agree that an Industry Working Group is probably the best way of evaluating the technical options for implementing CPS in Guernsey. To ensure that such a Group functions effectively and achieves a balanced input from all industry players, we would see value in the OUR participating in meetings of the Group.

Q7. We agree also that the scope of work and timeframe proposed are appropriate, although its duration (i.e. a maximum of 2 months) would probably need to be re-definable subject to progress made.

2. Number Portability in Guernsey

Q8 We 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, based on the fact that the most likely requirement for number portability would be for business users that competitors may target for direct connection.

Q9 We agree that an IN-based NP solution for Guernsey should not be considered at present because of the scale of the market requirement.

Q10 We agree that the call drop-back option could be a suitable NP platform for Guernsey.

Q11 We agree that simple forwarding could constitute a suitable NP platform for Guernsey and should be investigated further.

Q12 We agree that an Industry Working Group is, as with CPS, the most useful means of evaluating the technical options for implementing NP in Guernsey, subject to the comments we make above regarding involvement of the OUR and final agreement on duration being subject progress made.

We would be pleased to discuss particular aspects of our response with you in more detail if required.

Yours faithfully
NEWTEL GUERNSEY LIMITED

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