

التاريخ : 20/4/2017

الرقم : REG-181-17

عطوفة رئيس مجلس المفوضين / الرئيس التنفيذي المحترم
هيئة تنظيم قطاع الاتصالات

الموضوع: رد شركة زين على ردود الشركات على إخطار
طلب ملاحظات حول تعديل خطة الترفيم الوطنية

تحية طيبة وبعد،

اشارة الى الإستشارة الخاصة بطلب تعديل خطة الترفيم الوطنية، وإلى ردود الشركات المرخصة عليها، نرفق
بكتابنا هذا ردنا وملاحظاتنا على هذه الردود ضمن المدة المحددة، راجين أخذها بعين الإعتبار.

L.R.

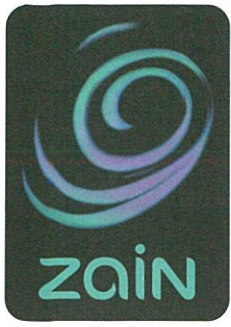
وتفضلوا بقبول فائق الاحترام،،،

الشركة الأردنية لخدمات الهواتف المتنقلة ("زين")

الرئيس التنفيذي

أحمد الهنادة

مرفق: رد شركة زين المشار إليه أعلاه



Introduction

On 27 January 2017 TRC issued a request for comments (RFC) on numbering. Subsequently, Zain has reviewed the responses from Orange Fixed, Mobile and Internet, and Umniah and summarised these in this document, we appreciate that TRC would take these comments into consideration.

Zain Comments on Other Operators' Answers to Questions

a. Numbering capacity for fixed geographic networks

TRC question 1

1.a: Do you think it reasonable to remove the geographic regions' codes (02,03,05,06) and instead allocate a unified code for all fixed services followed by operator code and geographic area code with no effect on the user existing number? In case you do not agree, please provide rationale for your views.

1.b: Do you support allocating (01) code as this unified code; so the new number range for Fixed Geographic Services will be 01 AB XXXXXXX; in case you do not agree; please set out your point of view and arguments.

Zain Response

Zain supports the 01 proposal. The 01 prefix in our view is aligned with international best practice, for example, in the UK number plan the second digit is a service digit which informs customers about the type of call that they are making. 01 and 02 are fixed line calls, 03 are non-geographic, 07 is a mobile call.

The proposal has advantages, for example as it could make it easier for customers to determine that a call is being made to a fixed geographic number. This clarity will ultimately benefit customers.

Charging differently between local and national calls is an outdated charging scheme, and therefore we do not see any benefit in the B digit, in our view the costs of delivering these calls are essentially the same.

We support the A digit as is useful for customers to be able to determine whether a call is on-net or off-net as charging will often be differentiated. We believe that defining the A digit as an operator identifier will be useful in this regards.



Zain Comment on Operators' Responses

The other respondents are unanimous in their objections to this proposal, they use very similar arguments like clarity, geographical relevance, and billing issues. We believe the arguments are much irrelevant, the costs of the national and local calls are much the same, and we do not see any changes need to be made for billing systems, and this scheme is aligned to some international practices as mentioned, that also add to the applicability of the proposal.

We believe also that running a parallel time between this NNP and the proposed amendments will give any operator the enough time to systems upgrade or changes that would allow to implement the amendments of the NNP in that regard.

b. Internet of Things and Machine-to-Machine Services

TRC question 2

2.a Please provide us with your thoughts regarding the need to allocate new code for the Internet of Things and Machine to Machine services that could be provided by all operators (fixed network, mobile network, etc). The suggested code is (04) as following: 04 AB XXXXXXXX whereby:

- i. A code: for operator (from 1 to 9)
- ii. B code: for service type: (7) for mobile and (6) for fixed

2.b Do you think it is reasonable and adequate to allocate number capacity in blocks of (10,000) numbers at this stage?

Zain Response

Zain supports the allocation of an 04 number range dedicated to IOT and believes that it is reasonable to use the A digit to identify the operator, but it does not foresee any requirement to use the B digit to differentiate between fixed and mobile services. We are unaware of any countries that allocate IOT numbers to fixed line services, although countries such as Germany do allocate number ranges (for instance 15020) specifically for mobile M2M services.

IOT enabled devices will either be connected to the internet using a fixed connection or have a mobile SIM card which is used for data and other services. Where the connection is a fixed connection it is unlikely that a phone number will be required at all as devices will be addressable by IP address. We therefore do not see any need for an additional digit to differentiate fixed and mobile.

Zain supports a dedicated number range for IOT in order to reduce the demand for longer mobile numbers, which could be disruptive to mobile customers. It is likely, in our view



that the number of mobile connected IOT devices will grow rapidly to very large numbers. With the existing demand for mobile numbers, this might necessitate additional digits in existing ranges unless IOT numbers are separated.

Although in some countries there was no specific dedicated number range to IOT, which in our view because they updated their numbering plan before IOT forecasts showed significant demand. We believe therefore the TRC should not mandate that existing IOT and M2M customer be forced to move their numbers to a new number range as this will be extremely disruptive. The new number range should be made available for new customers.

Zain believes that there will be significant demand for IOT SIM cards potentially with individual customers requesting more than 10,000 numbers for a single service. As a comparison we note that Saudi Arabia has allocated a full number range to IOT/M2M (the 0830 range), with 1,000m numbers available (9 digits after the NNG). We recommend one additional X digit (perhaps instead of the B digit) and suggest 100k number block allocations would be more appropriate.

Zain Comment on Operators' Responses

We believe that Orange's concerns are not justified, as making provision for IOT numbers now will add certainty and flexibility moving forwards. We urge the TRC to reject Orange arguments and consider the current rapid growth in IOT in the region and eventually in Jordan.

Orange Internet appear to have a concern that IOT number might become available to non-licenced operators. Though, the opportunity for service providers is biased towards mobile operators, which will, of necessity, require a mobile licence.

Umniah argue that number portability would make the current proposal problematic. However, we do not believe that portability is necessary for IOT services. A change of service provider requires a change of SIM and since MSISDN is rarely, if ever, "dialled" for IOT, and usually only known to a machine, device or provisioning system, then portability is not especially relevant.

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c. **Numbering Capacity for Location Independent Services**

TRC Response

What do you think about adding one new digit for the number capacity allocated for Location Independent services, so it will become: 0870XXXXXX to 0889XXXXXX with the capacity of 10 digits? whereby allocation of numbering capacity will be made in 10,000 numbers for each block.

Zain Response

Zain supports adding an additional digit to this number range. We see a potential use for this category of number to VoIP services for fixed line customers, as the same time would see sufficient numbers be available for that purpose.

Zain Comment on Operators' Responses

Orange do not appear to want an increase in the availability of Location Independent numbers. This is specifically to avoid these being used by other licensees for VoIP. We reiterate on our view that if sufficient numbers are made available from this category and made available to VoIP this would allow any other licensees to offer services, and would eventually help introduce and further enhance the competition, which is currently not sensed due to Orange's monopoly in the geographic number category. Additionally, an available number capacity in the above range is necessary to avoid any barriers.

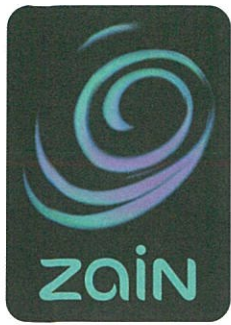
d. **Mobile Network Code (MNC)**

TRC question 4

Please provide us with your suggestions regarding amending the governing article related to limiting the allocation of MNC for mobile network operators only and instead to allow the same MNC allocation scheme for all network operators in general (Mobile and Fixed) in accordance with the International Telecommunications Union (ITU-T) Recommendation E.212, that removed the restriction of use by mobile operators only in order to facilitate the evolution of new technologies and related sectors and supporting technological platform. Also please provide us with your views regarding allowing the sharing of the same MNC for more than one operator?

Y

L.R.



Zain Response

Zain would like the TRC to consider expanding upon its definition of a mobile service provider when considering applications for MNC to operators who provide LTE services. Given that these companies rely on a SIM card and HLR it is reasonable to treat fixed LTE service providers in the same way as mobile service providers.

We do not foresee a need for fixed line service providers to be allocated MNCs. Fixed line operators already have facilities for using mobile services without the need for them to use a dedicated MNC.

Zain Comment on Operators' Responses

We reiterate on our position above, however, there is unanimity between OLO's responses against the proposal, which we believe is against the international practice, accordingly TRC should adopt the proposal in terms of MNC to fixed LTE operators and in terms of sharing MNC only in certain cases where the operators share core network infrastructure.

e. General comments

TRC question 5

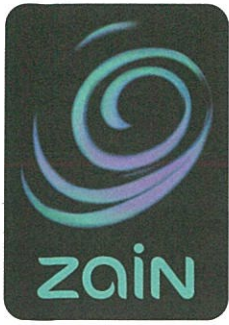
Do you believe that any of the other number capacities mentioned in the current national numbering plan and not discussed under this revision require any revisions? If yes, please identify those number scheme detailing the nature of the revision suggested and the rationale behind it in as much detail as possible with any supporting justifications.

Do you have any notes, observations, or comments regarding the mechanism and the way of measuring the effectiveness of the current number capacity utilization as stated in the TRC instructions for allocation and reservation of number capacity? and do you feel the need for any further revision.

Zain Response

We believe the TRC should not mandate that existing IOT and M2M customer be forced to move their numbers to a new number range as this will be extremely disruptive. The new number range should be made available for new customers.

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L.R.



Zain Comment on Operators' Responses

We see that TRC should adopt for the whole duration of the amended National Numbering Plan (NNP) a 65-60% utilisation percentage, rather than 80% after 5 years (as in the current NNP),

We also support the proposal for a quarantine period for recycled numbers of 3 months rather than 6 months, as this will stimulate the efficiency of number capacity usage.

TRC question 6

Please feel free to provide the TRC with any comments or suggestions regarding any other matters concerning number coding and capacity allocations and utilizations.

Zain Comment on Operators' Responses

Zain urges restraint when mandating changes to the NNP. Such changes are always disruptive to customers and take significant planning and effort to implement. Any mandated change should allow for a planning period of at least 6 months to a year, followed by a parallel running phase for a further two to three years. This allows operators to make the necessary changes to their network, billing and operational support systems, and for customers to effectively communicate the change to their family, friends, customers and business partners, as well as to update stationary, shop fronts, vehicle liveries, etc.

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