

Oni Telecom's comments on
ERG's "Common Position on VoIP (draft)" document
November 6, 2007

Please find below Oni Telecom's comments on the main conclusions presented in ERG's "Common Position on VoIP (draft)" document.

Emergency Services

We agree in general with ERG's conclusions. Our main concerns are the difficulties related to providing the caller's location information to the emergency centers in the case of nomadic users.

The proposed solutions (flagging potential nomadic users or allowing users to update their current location) are acceptable but we believe that nomadic services should use specific non-geographic number ranges (see below). This has already been adopted in Portugal.

Numbering

We agree that nomadism should be allowed by all providers.

We also agree that numbering plans should be technologically neutral but as long as the same service description applies. In this regard we believe that only traditional PSTN voice services and fixed VoIP services can be seen as sharing the same or similar service description. Nomadic VoIP services should not be viewed as equivalent to traditional PSTN voice services since nomadism is not a feature of the latter. As such, it is our belief that geographic number ranges should not be allocated to nomadic VoIP services. Instead, a specific number range should be allocated to nomadic services.

The allocation of a specific number range to nomadic services would bring transparency to the market since users would know when they were calling fixed or nomadic clients. This would be similar to the adoption of specific number ranges to mobile services.

On the other hand we have some concerns that were not specifically dealt with in the document:

- All VoIP operators should allow access to their clients by other operators' clients, irrespective of the type of the originating voice service (VoIP or traditional voice)
- Termination costs should not depend of the type of voice service of the called party

Number Portability

We agree with the obligation of number portability for VoIP services as long as this is restricted to occur within the same number range. In line with our belief that a specific number range should be allocated to nomadic VoIP services, number portability should only be allowed between two nomadic VoIP services (in the case of nomadic numbers) or between two fixed voice services, either VoIP or traditional PSTN (in the case of geographic numbers). Portability

from a nomadic service to a fixed service or vice-versa should not be allowed, since this would break the separation of number ranges.

Allocation of consumer rights and service provider obligations and ECS/PATS/PTN definition

We agree with the conclusions presented.