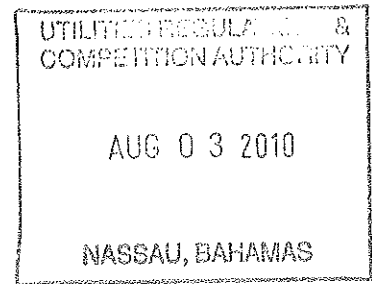




By Hand

July 30, 2010

Service by Hand:
Usman Saadat
Director of Policy and Regulation
Utilities Regulation and Competition Authority
4th Terrace East Collins Avenue
P.O. Box N 4860
Nassau, Bahamas



Dear Usman:

Cable Bahamas Ltd. Comments on The National Numbering Plan Document Draft (2010)

Please find enclosed Cable Bahamas Ltd. comments on "The Bahamas National Numbering Plan Document Draft (2010)".

Sincerely Yours
Cable Bahamas Ltd.

Chris Annesley

cc: Judith Smith (Legal Counsel)



**CABLE BAHAMAS LTD. COMMENTS
ON THE
UTILITIES REGULATION AND COMPETITION AUTHORITY'S DRAFT
BAHAMAS NATIONAL NUMBERING PLAN (2010)**

Please find below comments regarding the draft Bahamas National Numbering Plan (2010) document. This document only addresses the existing North American Numbering Plan (E.164 – International Public Telecommunications Numbering Plan used in the PSTN) and does not address NGN/IP Networks.

PSTN/NGN(Next Generation Networks):

Cable Bahamas feels the National Numbering Plan document has not made any reference to deal with service providers using Next Generation Networks (NGN). The increasing competition in the telecom network and subscriber's desire to have new range of services will require the inter-working of different Naming, Addressing and Numbering Systems. It is of Cable Bahamas opinion that URCA needs to establish a technology neutral numbering plan to allow for technological innovations, ENUM and number portability.

Number Portability:

Since The Bahamas has followed the North American Numbering Plan that of which is geographically-based it has not allowed for portable number assignments. Number portability was initially addressed in the Governments Telecommunication Sector Policy back in July 2001 followed by a revised edition in October 2002. Under section 7.14 of the TSP it stated that the Commission will provide guidance on number portability requirements in due course. On August 1, 2008 another Public Consultation was submitted on the Bahamas National Numbering plan re-enforcing the same directive stated back in 2001. On December 5, 2008 the BTC Privatization committee published a new Regulatory Framework for the Communication Sector and in this document was a government proposal " *The Government proposes to introduce number portability for fixed communications as soon as is practicably possible. It is intended that number portability would be introduced for mobile communications from the time that any alternative mobile service operators begin competing with BTC. The Government does not propose introducing absolute number portability between the mobile communications sector and the fixed communications sector at the moment though will leave open the possibility of the regulator introducing this in the future*"

Number portability is a regulated facility and is a significant barrier to new entrants if not implemented. It is well established that number portability is necessary to promote competition for basic telephony services and has been well established in most developed markets for several years.

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Until this is introduced there will be significant apathy discouraging potential customers from changing operator's owing to the fact they will have to change their telephone number. This customer apathy clearly benefits the incumbent operator. It is of CBL's opinion that the implementation of local number portability is well over due and must be acted on immediately to foster fair and equitable completion.

Vertical Services Codes:

Section 21.1 Vertical Services code table outlines the codes used by an Operator adhering to the NANP. There are service providers using different VSC codes as outlined in the NANP document (i.e. *68 – is to be used for “Call Forwarding Busy line/Don't Answer Activation. According to the existing telephone Directory *68 is being used for Selective Call Acceptance. *92 and *93 also have discrepancies against the NANP.) Will the regulator force all service providers to adhere to the vertical services code table so there is consistent numbering across all vertical service codes?

Short Code Assignment Table: Section 20

The code table states that both 911/919 (Police Emergency) will be used. 911 will be used on net for BTC and 919 will be for their operators. It is of CBL's opinion that one number (911) be the published standard number for Police Emergency.

Domestic Toll Free Assignment Table:

The 300 central office code has been allocated for all service providers for National Toll Free Service. It has been suggested that each service provider may apply to URCA to provide the service and may be assigned blocks of 500 telephone numbers. It is of CBL's opinion that blocks of 500 is overkill and a poor administration of numbering given the concern of exhausting the 242 NPA code by 2016. CBL recommends allocating blocks of 100 telephone numbers for Domestic Toll Free Services.

Conclusion.

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