



July 30, 2010

Mr. Michael Symonette,  
Chief Executive Officer,  
Utilities Regulation & Competition Authority,  
P.O. Box N-4860,  
Fourth Terrace East, Collins Avenue,  
Nassau.

Dear Mr. Symonette,

**Re: Bahamas National Numbering Plan**

Please find below the supplemental comments of Systems Resource Group Limited (SRG), d.b.a. IndiGO Networks<sup>®</sup>, with respect to the second round public consultation on the Bahamas National Numbering Plan (BNNP).

***9XX Short Code Dialling***

SRG agrees with URCA's proposed implementation of 9XX short codes. However, SRG would comment that using the Bahamas Telecommunications Company ("BTC") as an "off-net" single point of access to emergency services is less than ideal, since it introduces two points of failure:

- i) the interconnect between each operator and BTC, and
- ii) the interconnect between BTC and the emergency services system.

SRG has no uptime statistic with regard to the latter, however with respect to the former SRG can attest to the fact that BTC's interconnect does not even remotely meet the five nines (99.999% uptime) international standard for reliability. SRG's own experience over the course of the past 12 months is that BTC's interconnect has not met reliability of even 95%, meaning that in the past 12 months there were over 18 full days when the interconnect with BTC was badly affected. With respect, this is not good enough for day-to-day consumer use between networks, let alone for consumer access to the emergency services.

SRG understands that independent access to the emergency services system by multiple operators would require system upgrades to the existing equipment, perhaps even replacement. However, it should be considered whether the cost of equipment migration can be justified through increased reliability for the consumer at times when such reliability is most needed.

#### ***Telcordia Routing Administration***

SRG supports URCA's proposal to advise Telcordia of CO code assignments for subsequent acceptance of appropriate detail from each operator for input to the relevant databases.

#### ***Bahamas Toll Free 1-300 code***

SRG supports URCA's proposal to audit BTC's use of the 1-300 NXX and split the CO code into 20 blocks of 500 numbers each.

SRG notes, however, that URCA has stated that "BTC will be required to route traffic to each operator", which, whilst important to the mechanics of how 1-300 will operate, is less than the whole picture. URCA should bear in mind that not all 1-300 calls will originate on BTC's network, even while BTC retains its mobile monopoly. In practice, BTC as the dominant provider would need to be designated as the central routing party for 1-300 calls, but each operator must also be instructed to send all originated 1-300 calls that are not to terminate on its own network to BTC for onward routing.

SRG also notes URCA's comment that the National Numbering Plan ("NNP") is not the appropriate forum to discuss billing for the routing of calls, however, with respect, SRG must point out that without such a discussion URCA's 1-300 proposal becomes unworkable. If BTC is allowed to charge other operators to route 1-300 calls in the above scenario, then there will be a cost burden on those other operators that BTC does not have in offering the same service to its own customers. Given BTC's "ownership" of 1-300 for the purposes of routing, then SRG considers that URCA must enforce no-charge routing of 1-300 toll free calls by all operators, not solely BTC, and at the current time SRG knows of no other forum that would be more appropriate than the NNP in which the matter might be aired.

#### ***1-800-389 International Incoming Toll Free Service to The Bahamas***

SRG supports URCA's proposal to audit BTC's use of the 1-800-389 numbering resource for international incoming toll free services and allow use by other operators.

#### ***1-800 International Outbound Toll Free service from The Bahamas***

In its submissions to the Public Consultation initiated in 2008, SRG made the point that there are a select few 800 toll free numbers that route internationally, without use of 880, 881 or 882. SRG gave the example of American Airlines, 1-800-433-7300, and made the point that such arrangements need to

be regularised so that calls from all operators can be routed accordingly, and that appropriate inter-carrier billing can be carried out where applicable.

In its comments, URCA stated that it “does not see this as anything other than a commercial arrangement between BTC and their customers”. With respect, URCA has missed the point. An organisation that has a 1-800 number that terminates in the United States for toll free international calling from another country, does so because it wants to provide a service to customers in the originating country to be able to call unhindered and without charge. That was fine when BTC was the only provider of voice services, but that is no longer the case. For all other operators than BTC, calls will not route to the 1-800 number in question without incurring a charge, frustrating both the Bahamian consumer and the company that thought it had paid for its customers to have a toll free service.

Although some operators may be in a position to, and may wish to, develop separate access to the international 800 database network, other operators may not be in a position to do so. The problem may then best be addressed by BTC taking on a similar routing roll to that contemplated by URCA in its proposal for 1-300 service, with an appropriate mechanism to accommodate inter-carrier billing.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'P. Hutton-Ashkenny', with a stylized flourish at the end.

Paul Hutton-Ashkenny