

Public Consultation on the Assignment and Use of Mobile Numbers

Voxbone, October 2014

Voxbone welcomes the opportunity to comment on the Norwegian Post and Telecommunications Authority's Public Consultation on the Assignment and Use of Mobile Numbers (the "Consultation").

1. Preliminary Remarks

Voxbone applied for Norwegian mobile numbers in October 2013. Nevertheless, pending NPT's further study on the topic of the present Consultation, the applied numbering resources were not allocated.

Voxbone is aware that numbering administrations have to face scarcity issues and that is therefore crucial to guarantee an efficient use of numbering resources.

Such efficient use will however only be guaranteed if numbering regulations and allocations criteria follow the technology developments in the telecommunication sector.

2. NPT Questions

2.1 For what kind of services/technologies operators should be allowed to use mobile numbers?

Telecom operators should be allowed to provide a mobile VoIP service which is similar to traditional mobile telephony service but with the specific characteristic that the users only use their data connection (either 3G/4G or wifi) for mobility.

Mobile phone numbers are necessary to ensure that VoIP service is reachable from the PSTN and support SMS as it is the only way to support SMS connectivity.

The only difference between mobile VoIP service and traditional mobile service is the technology used to transport the calls and messages.

In accordance with technology neutrality principle, operators providing the same type of service but using different technology should not be placed in a disadvantaged position.

2.2 What could be the consequences of this change of practice?

Taking into consideration the evolving use of 4G, it is only a matter of time until all mobile calls will be transported over the data connections.

As stated above, numbering regulations and allocation criteria should take this evolution into account.

2.3 Which requirements in the Ecom regulations would be a challenge to fulfill for such services? NPT would especially like feedback on challenges regarding emergency services and caller location information.

In principle, VoIP only inbound providers should be exempted of complying with the requirement of providing emergency services. Inbound providers shall in any case clearly state this restriction to their customers.

VoIP service operators providing inbound and outbound services should have to ensure that calls to emergency services would be routed to the appropriate emergency services by its local partner's network. Emergency calls could be treated as location independent VoIP calls.

The technical ability to forward GPS coordinates to the PSAPs could be considered should PSAPs be obliged to support this and should the standard for next generation emergency services be defined.

Concerning the requirement of caller location information, as VoIP service operators would provide calls from mobile IP phones (calls would run exclusively over data connections) these calls can be considered as originated from IP phones.

Section 6-2a of the Regulations on electronic communications networks and electronic communications services (Ecom Regulations)¹ states that: *"For calls from IP phone in addition to the information in the first paragraph it must be stated that the transmitted address, see subsection 3, may differ from actual location."*

The calls could therefore be forwarded to emergency services with the information that the transmitted address may differ from actual location. This could be a temporary solution until specific regulation for emergency mobile IP calls has been issued.

2.4 Should there be a requirement to work on 2G for a service on a mobile number, both for emergency services and/or ordinary voice service?

The focus should be on 3G and 4G.

¹ Forskrift om elektronisk kommunikasjonsnett og elektronisk kommunikasjonstjeneste (ekomforskriften)

2.5 Should seamless handover between wifi and mobile network be a requirement for VoIP services on a mobile number?

Technical features such as seamless handover are valuable for consumers and their support are ways for operators to differentiate themselves from their competitors, however it should not be a requirement for VoIP service on mobile numbers.

2.6 Are there other aspects that need to be taken into consideration concerning the use of mobile numbers?

Concerning termination rates, VoIP operators should be treated as MVNOs. As a consequence, VoIP operators shall have the right to Mobile Termination Rates. As previously stated, in short time all mobile calls will be transported over the data connections, there is therefore no reason to consider this point in a different way.

3. About Voxbone

Voxbone is a service provider offering VoIP services to business and communication service providers.

Voxbone has been allocated mobile numbering resources in Belgium, Denmark, France, Netherlands, New Zealand, Sweden, United Kingdom, Poland, Germany and Finland. Voxbone is already providing mobile VoIP services in Belgium, Canada, Spain, Sweden, UK and US.