

## Submission

15 June 2022

# ACCAN feedback on Draft Local Number Portability Code

ACCAN thanks Communications Alliance for the opportunity to provide feedback on DR C540:2022 Local Number Portability (**the draft Code**).

ACCAN sits on the Working Committee that has been considering revisions to local number porting arrangements in response to the Review's Terms of Reference.<sup>1</sup> The Terms of Reference specify areas the Working Committee should focus on, including:

- the categorisation of ports and whether these are fit for purpose in a modern telecommunications environment;
- the current timeframes and service level agreements (**SLAs**) for ports and whether these can be improved;
- the impact of unauthorised ports on customers and what process improvements and SLAs can be introduced to minimise these harms;
- the introduction of a defined quarantine process consistent with other obligations;
- processes for individual number ports; and
- whether any process improvements can be implemented in a staged approach.

ACCAN is pleased to see that number quarantining arrangements outlined in the draft Code have been amended to minimise delays when resolving unauthorised ports. ACCAN also supports other small amendments proposed in the draft Code, including clarifying key definitions, referencing port reject codes, and codifying important elements of the Guideline.

However, ACCAN is disappointed that key parts of the local number porting process will not undergo substantial improvement to bring consumers' experiences in line with their expectations. ACCAN understands that port categories will not be modernised due to the financial and operational burden that the necessary ICT changes would place on Carriers and Carriage Service Providers. Additionally, there are no changes to Category A port SLAs. The proposed changes to SLAs for Category C porting are minimal, such as the updated requirement for the losing carrier to process and respond to a Pre-Port Number Validation within 3 business days 90% of the time, rather than 80% of the time as it was previously. While the SLAs are a welcome benchmark, without complementary changes to obligations we are concerned that these agreements will not address the root cause of local number porting issues. It is unclear how these small amendments to SLAs will actively speed up the local

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<sup>1</sup> Available: [https://www.commsalliance.com.au/data/assets/pdf\\_file/0003/85116/WC102-Terms-of-Reference.pdf](https://www.commsalliance.com.au/data/assets/pdf_file/0003/85116/WC102-Terms-of-Reference.pdf)

number porting process. Under the draft Code, residential and small business consumers therefore still face a risk that their local number ports could take far longer than expected, causing significant inconvenience and potential detriment and business loss.

ACCAN reiterates our view as expressed in our first submission to the LNP Code review:

- Local number port categorisations, particularly Category C ports, should be reviewed to reflect porting timeframes that are now operationally feasible due to technological developments and ICT advancements.
- Consumers' entitlements in the LNP process should be explicitly set out in the Code, as it is currently difficult for consumers to understand what to expect and what level of service they should be receiving.
- The Code should set obligations (or note obligations that sit in other industry Codes or Guidelines) for keeping consumers informed about the status of their ports at regular intervals.

Finally, we draw Communications Alliance's attention to two minor editorial changes that are required to the draft Code. Firstly, on page 7 the acronym for 'Complex Notification Advice' should be changed from CAN to CNA. Secondly, a reference to clause 4.2.322 in section 3.6.1(a) should be changed to reference clause 4.2.32.

Please do not hesitate to get in touch if you wish to discuss our feedback further.

Sincerely,

Andrew Williams  
ACCAN CEO

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*The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers.*

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