TELIO

January 19, 2005

Telio Netherlands B.V. (for Telio AS)
Rokin 55
1012 KK Amsterdam
The Netherlands

In reply to: Consultation Numbering policy VoIP services
Your reference: OPTA/EGM/2004/202992

Onafhankelijke Post en Telecommunicatie Autoriteit (OPTA)
Attn Dhr. H. Bernard
Postbus 90420
2509 LK Den Haag
The Netherlands

Dear Dhr. H. Bernard,

Telio has read the consultation document regarding the proposed numbering policy for VoIP services and would like to react. The changes proposed do encourage competition on services already existing, but do in Telios opinion limit the creation of new services.

Although the document describes different services that are using VoIP technology, the general impression is that VoIP is looked at as a service itself. Voice over Internet Protocol is in our opinion a technology, not a service as such. With VoIP most traditional services can be copied, but also new ones can be created. A comparison can be made with WAP, where WAP itself was not the service, but mobile Internet was, with WAP as a technology.

The split in applications of:

- Inter-carrier use
- Inter-office use
- PC 2 PC communication
- Telephony differentiated from broadband access
- Telephony tight together with broadband access

Is a good start. The description of the last one is too technical in our opinion. Voice over DSL is a strange term. This service does not at all have to be different from "Telephony differentiated from broadband access". With other technology this can be tied to the broadband location. The assumption that a different protocol layer must be used is simply not true. Any network owner can technically tie their service to a particular location. This may however not be operationally manageable, or be cost efficient.

Telio proposes a further split of the services as the customers are experiencing and buying them. For example: A customer can be called, and a customer can call. When a customer calls, Telio finds it understandable that the calling party number must fit in the geographical numbering space of the location where the customer is calling from. If in fact the number is dedicated as a geographical number. If however the customer receives telephone calls, it is indifferent what number the customer can be reached at. The customer must be able to choose what number he or she can be reached at, even if at that particular time the user is in a different location than where the number belongs.

In essence, this service already exists. It's the same as call forwarding, or inter-company call transfer. For example, as a consumer you can buy a telephone line in Amsterdam, and permanently forward the incoming calls to a number in Rotterdam. Also a company can transfer calls to a satellite office in Nijmegen, or even London! VoIP is here the technology that enables operators to offer such a service in a cost efficient manner.

Telio is therefore of the opinion that the restriction of use of geographical numbers is suitable for 'calling' but limiting the possibilities for 'being called'.

Smaller numbering blocks

Telio agrees that offering number blocks in smaller amounts is a good idea. However, the factor limiting the competition is not the size of the blocks and cost towards OPTA, but the cost of implementation of these blocks. Telio therefore finds it far more important to address the implementation costs in KPNs network, rather than the size of the blocks given out. Since the cost of implementation is per block of numbers, it is expectable that most operators will acquire as large blocks as possible, avoiding additional implementation cost in the future. It is more reasonable if the charge is per implementation effort, instead of per number. This is a better reflection of the actual costs, and more in sync with how other European Regulatory Agencies have regulated their environment.

Mobile numbers for VoIP

Telio is of the opinion that it is the description of "communication possible while moving over larger distances" is too vague. If the possibility is there, is it then allowed? Can any laptop with a WiFi card and a softphone receive a mobile number?

Personal number range

The pricing problems with the these number ranges will make it unusable for the consumer to use these numbers. Telio encourages the OPTA to open a new number series that allow nomadic use for both outgoing and incoming calls. The charges to call these numbers must be the same as any regional number.

Dutch numbers abroad

Telio finds it unreasonable to limit the numbers for use in Holland. Significant cost advantages for the end users can be made by offering Dutch numbers abroad. These

services will give a new spin to competition on the International Calls market. But above all, already today a normal phone can also be unconditionally forwarded to a number abroad. Telio sees no difference in the service as such, just in the technology behind it.

Conclusion

Although Telio is of the opinion that the general outline of allowing voice over broadband by providers not owning the network is a good incentive in increasing competition, Telio is of the opinion that the OPTA is still far to restrictive and thereby limiting the development of new services and with that limiting the possibilities of increasing competition by differentiation.

Pleas find my details below and don't hesitate to contact for further discussion.

With kind regards,

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