

The logo for Optus, consisting of the word "OPTUS" in a bold, teal, sans-serif font.

Submission in response to
Communications Alliance public
comments sought in relation to
DR C570:2024 Mobile Number
Portability Industry Code

**DR C570:2024 Mobile
Number Portability
Industry Code**

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Section 1. INTRODUCTION

- 1.1 Optus appreciates the opportunity to provide input to the Communications Alliance DR C570:2024 Mobile Number Portability Industry Code (MNP Code).
- 1.2 Optus' interest in the MNP Code relates to its roles as a Carrier / Carriage Service Provider (C/CSP).
- 1.3 Optus promotes the MNP Code in it's ability to allow consumers and businesses to seamlessly transfer mobile numbers between service providers in the Australian mobile telecommunications market.
- 1.4 Optus works closely with Communications Alliance on various initiatives, including on the development of Codes and Guidelines for the improvement of services to consumers and business within the telecommunications industry.
- 1.5 While generally supportive of the draft Code, Optus continues to advocate for mobile number porting to be more widely available to consumers and businesses at the time of their choosing. While Optus acknowledges that porting time frames have been marginally extended under the draft Code, Optus continues to advocate for 24 / 7 mobile number porting to be made available within the telecommunications industry.

Section 2. FEEDBACK ON DR C570:2024 MOBILE NUMBER PORTABILITY INDUSTRY CODE

Mobile Number Porting availability to consumer and business customers.

2.1 Under the current draft Code, MNP operation hours have been increased to:

- 8am – 11pm AEDT/AEST for Weekdays; and
- 10am – 6pm AEDT/AEST for Saturday and Sunday.

Supported hours are to remain as:

- 8am to 8pm Monday to Friday; and
- 10am – 6pm on Sat.
- Sunday will remain unsupported.

Although Optus supports the extension of Standard Hours of Operation, we emphasize the continued necessity of an ‘always open’ Mobile Number Portability (MNP) model, even if it is not officially supported for a more extended period than the current drafting requires.

While Optus appreciate the proposed 3-hour extension on weekdays and the formal opening of Sundays, we advocate for further expanding operational hours to a 24/7 model. This adjustment aligns with the evolving expectations of customers in the current retail landscape. However, we acknowledge the importance of striking a balance to accommodate system maintenance and the potential impact on each carrier's availability and ability to maintain a 24/7 MNP.

2.2 Optus firmly endorses the extension of the Customer Authorization time frame from 30 days to 60 days as proposed in the draft Code. This increased flexibility is crucial, especially during instances of delayed hardware delivery. The adjustment enables industry to fulfill both customer and regulatory expectations by providing a valid Customer Authorization.

2.3 Optus also strongly supports changes to the way reversals are processed as it removes some of the complexities surrounding the obtaining of validation details when a service has ported more than once after an initial unauthorised port.

Ends.