TELSTRA GROUP LIMITED

Communications Alliance – Review of Codes, 2023

- **C570** Mobile Number Portability Incorporating Amendment No.1/2015 Industry Code
- **C657** Inbound Number Portability Industry Code

Public Submission

19 May 2023

1   Introduction

Telstra welcomes the opportunity to respond to Communications Alliance's review of the Inbound Number Portability and Mobile Number Portability Codes.

2   Codes for review

2.1   C570 Mobile Number Portability Incorporating Amendment No.1/2015 Industry Code

We have reviewed the Number Portability Code and support **reconfirming** this Code for another 5-year period, subject to the following recommended amendments being considered.

Clauses 4.2.3 and 4.10.3 encompass distinct obligations for two parties. We propose splitting each of these clauses into two separate clauses, with each of the separate clauses specifically addressing the obligations of the respective responsible party.

In Clause 4.12.1, the term 'accepted' is inaccurately used to describe the confirmation of a Port Cutover Notification by the Losing Mobile Carrier. To enhance clarity, we suggest replacing 'accepted' with 'confirmed' to accurately convey the intended meaning.

Clause 4.16.12 currently encompasses distinct obligations for three parties. We propose splitting it into three separate clauses, each specifically addressing the obligations of the respective responsible party.

In Clause 5.1.12, the term 'acceptance' is inaccurately used to describe the confirmation of the Give Back Notification by the Donor Mobile Carrier. To enhance clarity, we suggest replacing 'acceptance' with 'confirmation' to accurately convey the intended meaning.

Clause 7.3.1 (b) needs to be revised as it currently refers to Section 7.8 from an obsolete version of the Telecommunications Consumer Protections (TCP) Code. In the current version of the TCP Code, the equivalent reference is Section 9.2. However, it is unclear whether Section 9.2 is the correct TCP Code reference for Clause 7.3.1 (b). Clause 7.3.1 (b) defines when a Port is considered unauthorised in cases involving Customer representation by an agent, but Section 9.2 and the previous Section 7.8 of the TCP Code do not specifically address this scenario.

Finally, there are several references to outdated documents throughout the Code that require updating to enhance clarity.

2.2   C657 Inbound Number Portability Industry Code

We have reviewed the Inbound Number Portability Code and consider there are no amendments required. We support **reconfirming** this Code for another 5-year period.