

## Letterhead of Hutchison Telephone Company Limited

CB(1)1845/00-01(01)

26 July 2001

### **BY FACSIMILE (FAX NO.2121 0420) AND BY HAND**

Legislative Council Panel on Information Technology and Broadcasting  
Legislative Council Secretariat  
3/F., Citibank Tower  
3 Garden Road  
Central  
Hong Kong

Attn: Hon Sin Chung Kai, Panel Chairman

Dear Hon. Sin Chung Kai

### **Licensing of Third Generation (3G) Mobile Services - Mobile Number Portability**

We would like to thank you for your invitation to us to submit our views on the Information Memorandum recently published in relation to the licensing of third generation (3G) mobile services in Hong Kong.

We refer to paragraph 2.5.2 of the Information Memorandum which sets out the requirement for the 3G licensees to provide mobile number portability ("MNP") from launch of services, and for the mobile numbers to be portable between 2G and 3G services, in addition to within 3G services.

As stated in our previous submission on OFTA's second consultation paper "Licensing Framework for Third Generation Mobile Services, Analysis of Comments Received, Preliminary Conclusions and Further Industry Consultation" made on 13 November 2000, we are of the view that MNP should not be required at launch based on the following reasons:

1. **Key identifier:** Telephony would not be the only key service and hence the telephone number will no longer be the only customer identity in the 3G era; there are many other identities which are less portable such as:
  - E-mail address: this is under the control of the domain name of the operator, MVNO or reseller and is non-portable.
  - Personal homepage: this is also under the domain name of the operator, MVNO or reseller.
  - IP Address: Inter-operator IP routing is based on 256 IP addresses block basis, which is referred as Class C address. Porting a single end-user IP address would require routing on single IP level, which is not allowed at the present moment.

2. **Implementation:** Since the implementation of 2G MNP in Hong Kong took 8 to 12 months, 3G MNP would inevitably take longer due to higher complexity in 3G. In particular:

- Interconnection arrangements for 3G operators and MVNOs are as yet undefined. Undefined items include numbering arrangement for 3G operators and MVNOs, traffic forecasts for interconnection circuits and database dimensioning, the interconnection arrangement between operators and the various logistics arrangements such as most importantly the porting procedures.
- In 2G MNP implementation, all fixed and mobile network operators were fully involved from researching of the technical solution, specifying standards and procedures through to the final implementation. With the introduction of MVNOs in 3G, the number of operators will be greatly increased and will be varying from time to time. This implies the aforesaid industry collaboration approach once used in the 2G MNP will not be repeatable. Of course this adds tremendous difficulty in the exact dimensioning of the common gateway/ticketing systems.
- 3G services will have more stakeholders and interconnection options than 2G services. Defining number portability specifications prior to the availability of any market information may lead to poor choices of technologies and processes to enable number portability.

3. **Service delays:** In our view, it is not in consumers' interests to wait for 3G voice MNP to be resolved at the sacrifice of the early launch of various kinds of 3G data services. Should 3G MNP be required at service launch, it is inevitable that service launch will be delayed until the last network operator (be it 2G, 3G, fixed network, MVNO or any other operator) is ready for MNP and agreements (commercial, technical, regulatory and otherwise) have been reached and resolved amongst all participating entities. The issue is further complicated by the fact that there is no licence obligation on existing 2G network operators and fixed network operators to support this initiative. This in fact translates into a common launch date for 3G services in Hong Kong, and those 3G licensees which are ready early will be unnecessarily penalised.

We therefore propose that:

- a. any 3G licensee should be allowed to launch 3G mobile services so long as it has achieved the capability to perform database dipping and associated call routing functionality, notwithstanding that other 2G/3G licensees, fixed network operators, MVNOs and any other operators may not have physically interconnected for the purposes of MNP and may not have properly equipped with MNP functionality; and

- b. the TA convene a technical task force to co-ordinate MNP, which we would be delighted to participate.

Should you require any further information or clarification on the above, please do not hesitate to contact the undersigned at 2128 6332.

Yours sincerely

Cliff Woo  
Deputy Managing Director and Wireless Networks Director  
Hutchison Telephone Company Limited  
Encl.