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ICTA

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Cost Sharing Methodologies for LNP

WestTel would prefer that all costs for LNP CRD system be allocated to each operator based on a percentage of total revenue derived from fixed line and mobile operations. The ICTA receives audited financial information from each operator. Revenues are subdivided by source, with mobile and fixed line telephone being separated from other streams of revenue. Each operator would be responsible for their share of LNP costs based on the percentage of revenues as compared to the total market revenue.

WestTel is of the opinion that this is the best choice for cost sharing for the following reasons:

- Operators with high market share will have greater opportunity to recoup costs from subscribers and the porting process
- LNP costs would not create a barrier to new market entrants
- Operators are already required to provide all necessary data to the ICTA. There would not be a requirement for additional data collections.
- Information is verified by an independent third party, the financial auditor
- Costs could easily be separated into fixed and mobile pools in order to fairly distribute costs to carriers that operate only fixed line networks.

Yours sincerely,

Michael Edenholm