

**Implementation Plan for
Toll Free Services
in the
Republic of Trinidad & Tobago**

Draft

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1. Introduction

Toll free services are mainly used by business customers to boost enquires for their products as the caller does not pay for the call. The calls may terminate on call centres, sales departments or individual single lines depending on the size of the business. Some businesses make use of customized toll free numbers to enhance their image and gain a competitive edge. The service provider bills the customer to whom the toll free number has been assigned for all the calls received on the line(s). Toll free numbers are normally used for incoming calls.

Historically, toll free numbers were implemented at a time when there was one monopoly service provider in Trinidad and Tobago. There is now competition in the telecommunications sector in the fixed line and mobile markets. The efficient use of numbering resources must continue in the liberalised environment.

Currently, the dialling format in Trinidad and Tobago is seven (7) digits, for example 800-8288.

In the NANP (North American Numbering Plan) area, the dialling format is ten digits (for example 800-256-5381) with an Easily Recognisable Code¹ format numbers are used such as 800, 888, 877, 866 and 855. There are also vanity numbers such as 800-LAWYERS. A caller dialling these numbers knows in advance that the call is at no cost to them. These codes are non-geographic in nature as they are not tied to a particular rate area. They may be ported, reclaimed and re-issued to other customers.

1.1 Objective

The objective of this document is as follows:

- a) To make recommendations to improve the utilisation of toll free numbers in the competitive environment in Trinidad and Tobago;

¹ Easily Recognisable Codes are codes which repeat the second and third digits e.g. 800, 888, 877, 866 as well as the service codes 211, 311, 411... 911.

- b) To propose a new network configuration for toll free services in Trinidad and Tobago;
- c) To propose a new dialling plan for toll free services in Trinidad and Tobago.

1.2 Regulatory Environment

The Telecommunications Act 2001, as amended in 2004 provides the legislative framework for the Telecommunications Authority of Trinidad and Tobago to develop a plan for the numbering of telecommunications services. The Authority is also responsible for the administration and management of such numbers.

The Authority cites the following to support its intervention to improve the utilisation of toll free numbers:

- Telecommunications Act No 4, 2001 Section 25. (1) which states:
“In addition to the requirements of sections 22 and 24, a concession for a public telecommunications network or a public telecommunications service shall include conditions obliging the concessionaire to provide for—
 - a. direct interconnection with the public telecommunications network or public telecommunications service of another concessionaire;*
 - b. indirect interconnection with such network or service referred to in paragraph (a), through the public telecommunications networks or public telecommunications services of other concessionaires; and*
 - c. the transmission and routing of the services of other concessionaires, at any technically feasible point in the concessionaire’s network.*
- Telecommunications Act No 4 , 2001 Section 25 paragraph 2 (1) which states:
“permit other concessionaires of public telecommunications networks and public telecommunications services to have equal access to telephone numbers, operator

services, directory assistance and directory listing at a cost efficient rate without unreasonable delay, in accordance with requirements prescribed by the Authority;”

- Telecommunications Act No.4 , 2001 Section 25 paragraph 2 (k) which states:
“Provide dialling parity to other concessionaires of public telecommunications networks and public telecommunications services in accordance with the requirements prescribed by the Authority;”
- Telecommunications (Interconnection) Regulations, 2006 Part 11 paragraph 3 (a) which states:
“A concessionaire shall provide direct and indirect interconnection of the networks and services of other concessionaires to its own networks and services.”
- Other relevant documents - The Authority’s Draft Numbering Plan and Regulations.

1.3 Review Cycle

This document shall be modified periodically to meet changing and unforeseen circumstances. The Authority, any entity in the telecommunications sector, or any appropriate industry forum may identify the need for modification. When a need for modification is identified, the identifying entity will submit the modification issue to the Authority. Modifications shall be made in a manner that is transparent and in the public domain.

Questions or concerns regarding the maintenance of this document should be directed to the Authority via e mail at policy@tatt.org.tt or via hardcopy at:

Telecommunications Authority of Trinidad and Tobago
#5, Eighth Avenue Extension
off Twelfth Street
Barataria

1.4 Consultation Process

The Authority is seeking the opinion of stakeholders regarding the proposals made for toll free services in this document, in accordance with the Authority's *Procedures for Consultations in the Telecommunications Sector of Trinidad and Tobago* (<http://www.tatt.org.tt>). This draft plan shall be made available for two rounds of consultation.

Comments should be submitted on or before 22nd June 2015 to policy@tatt.org.tt or mailed to:

Telecommunications Authority of Trinidad and Tobago
#5, Eighth Avenue Extension, off Twelfth Street
Barataria
Trinidad and Tobago.

2. Current Toll Free Services Situation in Trinidad and Tobago

2.1 Telecommunications Services of Trinidad and Tobago (TSTT)

The incumbent currently offers a toll free service based on a seven digit format e.g. 800-XXXX, with the last four digits XXXX being customisable (as far as possible) at the consumer's request. This limits the degree of customisation available to customers as only four (4) digits are available. TSTT's existing fixed and mobile customers dial a seven digit toll free number at no cost to themselves (call originators) to access the service. Typically, business customers utilise the 800 numbers to encourage consumers to access their services.

The number 888-CARD was also used by TSTT for access to the Companion Card Service Platform (accessible for local BMobile and TSTT fixed line customers only) at no cost. This service has been discontinued.

Additionally, TSTT's Customer Call Centre can be accessed via 824-TSTT at no cost to TSTT's customers. However, a charge is levied for calls originating from consumers on other concessionaires' networks. This number is also accessible internationally by dialling 1-868 824-TSTT from World Zone 1 countries at normal international rates.

Both numbers 888-CARD and 824-TSTT were assigned prior to the promulgation of the Telecommunications Act 2001. However, they are not sold to business customers for true toll free services.

2.2 Digicel Trinidad and Tobago Limited

Digicel uses the code 866 to offer toll free services on its network. This code was assigned by the Authority on 22nd June 2009. Digicel had initially asked the Authority for a block of numbers in the 800 toll free code. However the Authority was unable to grant this request given the current use and configuration of the 800 toll free service offered by TSTT. Consequently the Authority offered Digicel the use of the code 866 for toll free services (under certain specified conditions)

until such time as the Authority could reconsider the issue on a more holistic basis. Digicel also utilises the seven digit format 866-ABCD with consumers being able to customise the last four digits. This therefore limits Digicel in providing customised numbers to its subscribers, which is a major selling point in toll free services.

2.3 Columbus Communications Trinidad Limited (FLOW)

Flow uses the code 877 to provide toll free services. This code was assigned by the Authority (under certain specified conditions) on 8th May 2009. Flow also uses the seven digit format for its toll free service and suffers from the same limitation in providing customised numbers to its subscribers. Flow's customers dial 877-ABCD to access its toll free service at no cost to Flow customers.

2.4 Issues with the Current Situation

- Competition in toll free services and customised toll free numbers in particular is limited due to the use of seven digit toll free numbers of which only the last four digits are customisable.
- Current operations of toll free services in Trinidad and Tobago contribute to an inefficient use of toll free numbers. As an example TSTT, which has available almost ten (10) thousand numbers for customer usage, only utilises a small fraction. Similarly Digicel and Flow face the same inefficiencies with the toll free codes allocated to them, and in fact given that their services were only launched relatively recently, their customer base may be even lower than the incumbent TSTT.
- The inefficiencies in the current method of assignment of toll free numbers are compounded by the fact that there are limitations on the quantity of customised numbers in the thousand block ranges with the seven digit format currently deployed in Trinidad and Tobago for toll free services. Customised toll free numbers are a revenue earner for the operator and a value added benefit to the user.
- The current assignment of separate local toll free codes to each concessionaire essentially results in poor utilisation and wastage of toll free numbers and each concessionaire actually pays separately for the toll free code. Given the (assumed)

current customer base, one toll free code, for example 800, can more than satisfy the local market. There are four (4) codes in use at present.

- The assignment of the toll free codes 800 and 888 initially to the incumbent provider prior to liberalisation of the market does not allow for the efficient use of toll free numbers in Trinidad and Tobago. The demand for toll free numbers in Trinidad and Tobago is not expected to exceed the total quantity of numbers in the 800-XXXX format in the foreseeable future. In light of the afore-mentioned issues identified, the Authority is proposing changes to the current toll free service in Trinidad and Tobago.

3. Operation within the North American Numbering Plan (NANP)

3.1 What is SMS/800?

The 800 Service Management System (SMS/800) is administered by SMS/800, Inc. SMS/800 is a centralized system that performs Toll Free (800, 888, 877, 866 and 855) number management. At this time, planning is underway for the future Toll Free codes of 844 and 833. All Toll Free Service Providers that assign Toll Free numbers for use within the North American Numbering Plan (NANP) must use SMS/800 to verify the availability of specific numbers, reserve them, create Customer Records, and download records to Service Control Points (SCPs) to facilitate call processing.

SCPs are real-time database systems that contain instructions for routing calls. SCPs are updated by SMS/800 with call routing instructions. Local Exchange Carriers (LECs) query the SCPs to determine how to complete a Toll Free call.

SMS/800 services are provided to both Responsible Organizations (RespOrgs) and Service Control Point Owner/Operators (SCP O/Os). RespOrgs are organizations that use SMS/800 to perform number management functions for Toll Free customers. SCP O/Os may perform these functions directly as a RespOrg or arrange to have them completed by another RespOrg. It usually takes just a few minutes to enter call processing information for any given Toll Free number.

3.2 Who is SMS/800?

SMS/800, Inc. is responsible for carrying out the day-to-day operations of the SMS/800 services provided to both RespOrgs and SCP Owners/Operators, including management and coordination of:

- **SMS/800 Help Desk** - Provides general support services for RespOrgs and SCP O/Os in their daily use of the SMS/800. The SMS/800 Help Desk is accessible twenty-four

(24) hours per day, seven (7) days per week. SMS/800 Help Desk staff members may access Customer Record data in order to assist RespOrgs with using SMS/800; generating reports; other functions related to SMS/800. The SMS/800 Help Desk is also responsible for making RespOrg changes and resetting passwords upon request.

- **SMS/800 Data Center** - Provides operational support and the hardware for SMS/800. The SMS/800 Data Center also provides support for software testing, operation of the SMS/800 Tutorial environment, and issues related to the SMS/800 access facilities.
- **SMS/800 Software Support** - Provides services which include software maintenance, site support, capacity and performance planning as well as new feature development.
- **SMS/800 Website Support** - Provides services which include SMS/800 Website development and maintenance.

3.3 History of SMS/800

- ❖ **1967** – 800 numbers were introduced by AT&T as what they called Inward Wide Area Telecommunications Services (INWATS). Customers could receive calls originating within a relatively wide geographic area and pay for them on a "bulk" basis instead of being charged for individual calls.
- ❖ **1981** – The computer revolution led to the implementation of a first-generation system of centralized databases for processing Toll Free number calls according to the specific instructions in Customer Records (CRs).
- ❖ **1984** – With the Bell System divestiture, Toll Free service was required to be opened to competition. As a result, an 800 service network had to be developed that would make Toll Free service offerings possible for any telecommunications company.
- ❖ **1991** – The Federal Communications Commission (FCC) issued an order to make Toll Free numbers fully portable by March 4, 1993. In 1992, the FCC extended the deadline to May 1, 1993.

Number Portability means that Toll Free numbers are not associated with a particular RespOrg or carrier. Toll Free Subscribers can switch to another RespOrg or carrier without changing their Toll Free number(s), and they can choose separate carriers for

specific kinds of traffic. Before number portability, Toll Free subscribers were locked into their carriers. They could not change those carriers without changing their 800 numbers.

- ❖ **1996** – The demand for 800 Toll Free numbers increased and 888 was released as the number of available 800 Toll Free numbers was on the verge of being exhausted.
- ❖ **1998** – The demand for 888 Toll Free numbers increased and 877 was released as the number of available 888 Toll Free numbers was on the verge of being exhausted.
- ❖ **2000** – The demand for 877 Toll Free numbers increased and 866 was released as the number of available 877 Toll Free numbers was on the verge of being exhausted.
- ❖ **2008** – The SMS/800 Executive Team (SET) formed SMS/800, Inc.

2010 – The demand for 866 Toll Free numbers increased and 855 was released as the number of available 866 Toll Free numbers was on the verge of being exhausted.

4. Proposed Reconfiguration for Toll Free service

The following is being proposed for improving efficiencies in the provision of toll free services in Trinidad and Tobago.

4.1 Change in Length of Toll Free Number

With both options explained below, it is expected that the toll free CO codes 888, 877 and 866 will be returned to the Authority.

It is also proposed that all unused numbers in the 800, 866, 877 and 888 CO codes be returned to the Authority. All subscribers using local toll free numbers in the old format will be migrated to the new ten digit 800 format. A permissive dialling period will be allowed (one (1) year maximum) for customers who already have toll free numbers in the seven digit format and have been migrated to the new format, given its greater flexibility for customization. All customers must migrate to the new system within six months of the completion of the new toll free system.

4.1.1 Option 1

Toll free numbers used in Trinidad and Tobago are currently seven digits in length. For each local toll free code currently assigned to operators there are approximately ten thousand numbers available. Customised numbers are available but limited due to the constraint of the toll free CO code having the capacity for only one subscriber number in any thousand block range so that competing subscribers could not customise their toll free number once it has been assigned although it spells a different name e.g. 800-FISH which is 800-3474 cannot be reused by another customer to be customised such as 800-DISH which use the same digits.

It is therefore proposed that the length of the local toll free number be increased from seven digits to ten digits.

Current toll free number (seven digits): 800-XXXX X = 0 - 9

Proposed toll free number (ten digits): 800-NXX-XXXX N = 2 – 9 and X= 0 - 9

While this will entail more digits for the subscriber to dial, it will improve the opportunities for business subscribers to get their own customised number, thereby improving their competitiveness. This format also will enable consumers to easily distinguish international toll free numbers in the NANP eg. 1-800 FLOWERS from local 800 numbers eg 800 – FLOWERS. In any event, customers in Trinidad and Tobago who dial international toll free numbers in the NANP normally get a warning that they will be charged international rates for the call. Local toll free calls will not have this warning.

Given the proposed format of the new local toll free number, the Authority does not expect that significant changes will be required in local exchanges. The establishment of a centralized database/clearinghouse for toll free numbers will permit equal access to toll free numbers by customers of all concessionaires. Thus all toll free numbers can be accessed by the population at large, regardless of which concessionaires they are connected to. The Authority will issue the toll free codes to the organisation managing the toll free number database/clearinghouse.

4.1.2 Option 2

This option still involves changing the length of toll free numbers to 10 digits, but identifying the local operator of the toll free number by the 4th Digit. As an example, the toll free number 800-6 FLOWER will be operated by TSTT, whilst the toll free number 800-3 LAWYER would be operated by Digicel. Hence it is proposed that the following 4th digits would be associated with particular operators:

800 – 1 XXXXXX – NOT ALLOWED (N = 2 - 9)
800 – 2 XXXXXX – COLUMBUS
800 – 3 XXXXXX – DIGICEL
800 – 4 XXXXXX – 360 COMMUNICATIONS
800 – 5 XXXXXX – LISA COMMUNICATIONS
800 – 6 XXXXXX – TSTT
800 – 7 XXXXXX – OPEN TELECOM
800 – 8 XXXXXX – 3RD MOBILE
800 – 9 XXXXXX – RESERVED

5. Advantages/Disadvantages of Both Options

The advantages and disadvantages of the afore-mentioned options are as stated in the table below.

OPTION 1	ADVANTAGES	DISADVANTAGES
	• 800 numbers can be ported between operators. • There are a larger number of customizable digits (7) as versus option 2, which has 6 customizable digits. • Less scope for customer confusion with vanity numbers as the same 7 digit number/corresponding word cannot be used more than once by any customer and service provider. • Allows reclamation of other toll free codes 877, 888, 866	• Requires that a separate organization and Signalling Control Point (SCP) be set up which will administer 800 numbers for the concessionaires as well as provide routing information. • Initial capital cost is relatively high. • May require operator network upgrades
OPTION 2	ADVANTAGES	DISADVANTAGES
	• Initial capital cost is relatively low. • Should not require operator network upgrades. • Does not require new separate organization and SCP. Calls can be routed between operators by utilizing the 4th digit which is unique to each operator. • Allows reclamation of other toll free codes 888, 877 and 866.	• 800 numbers cannot be ported between operators. • Number of customizable digits for vanity numbers is (6) versus (7) for option 1. • More scope for customer confusion with vanity and 800 numbers as eight (8) potential service providers can provide the same last six (6) digit number, for example: 800 N LAWYER (N = 2- 9) • No more than eight (8) concessionaires can offer toll free services.

6. Customer Procedures and Operator Guidelines

The Authority proposes that a working group be constituted amongst the concessionaires and the Authority to develop standardised customer procedures for toll free services utilising the proposed new dialling format. As a starting point for further discussions, the Authority suggests the following guidelines:

- Business customers apply for a new toll free number from the entity that they wish to or currently subscribe to for their telecommunications service;
- Customers who already have an existing number, for example 800-WOOD, will be given first preference for the last four digits of their new 800 number;
- Customers will pay the concessionaire to whom they are connected the appropriate charges for toll free services;
- Concessionaires will settle costs between themselves as per their interconnection agreements.

Further detailed procedures are to be developed by the working group.

7. Recommendation

Given the disadvantages and business complexities involved in Option 1, the Authority opines that **Option 2 is the preferred solution to implement.**

It is recommended that the current toll free configuration in Trinidad and Tobago be changed to improve efficiency of number resource utilisation and to allow a greater degree of customisation of toll free numbers. The following changes are proposed:

1. Change the seven digit format for toll free numbers to a ten digit format which will provide subscribers with a wider choice of customised numbers
2. Reclaim all unused toll free numbers in the following CO codes assigned to various concessionaires:
 - a. 800
 - b. 888
 - c. 866
 - d. 877

Numbers already in use in the 866 and 877 toll free codes shall be migrated over to the ten digit format using the 800 toll free code in the first instance.

Statement of Purpose on Toll Free services:

- 1. The Authority proposes to implement a national toll free service accessible by fixed line and mobile subscribers of all public telecommunications networks*
- 2. The Authority proposes that the dialling format for toll free numbers be changed from 7 digits to 10 digits. The 4th digit of the toll free number would determine which operator is offering the service.*