

## OPTUS – C570 Review comments

Optus welcomes the opportunity to comment on the Communications Alliance review of the Mobile Number Portability Code (C570-2009). We consider this to be a timely review to update the Code and propose that careful consideration is given to the Standard Hours of Operation to bring the code in line with an increasing level of digital self-serve requirements from Australian consumers. Consumers can quickly purchase eSIMs online at any time of the day, the code needs to support mobile number porting promptly after SIM purchase.

Optus proposes the following changes to the Code:

- Change the **Standard Hours of Operation** as follows:
  - on a Business Day means 7 a.m. to 11 p.m. (Standard Time) from Monday to Saturday, and 10 a.m. to 6 p.m. (Standard Time) on Sunday, Easter Monday, Queen's Birthday and Boxing Day unless otherwise agreed between CSPs, MCs, and NPs on a bilateral basis.

While we support a change to the Standard Hours of Operation, current staffed support hours should not be changed.

- At Section 4.18 **Port Recovery**, make the following changes at item (b)

*the current CSP must, within two days, consider the evidence provided by the Previous CSP and where considered valid the current CSP must provide written agreement to the Previous CSP that the Port Recovery should proceed, including such Port data (~~account number or date of birth~~ the last reqID attached to the Mobile Service Number) as necessary to allow the Port to be initiated by the Previous CSP and be accepted by the current CSP;*

- Remove all references to CDMA technology and make the Code more technology neutral.