



Jersey Competition Regulatory Authority
2nd Floor Salisbury House
1-9 Union Street
St Helier
Jersey
JE2 3RF

Subject: Response to Telecoms Market Review, Draft Decision, Case T-083

Rotterdam, 23 April 2025

Dear Sir, Madam,

We refer to your Telecoms Market Review – Draft Decision, Case T-083 (“Draft Decision”) published on 26 February 2025. With this letter, PXS B.V. (“PXS”) provides its response to the Draft Decision.

PXS provides the Number Portability Clearinghouse (“NPC”) facilitating Mobile Number Portability (“MNP”) in the Bailiwick of Jersey, as well as Guernsey since 2008. Therefore, the scope of our response is limited to Question 4 of the Draft Decision:

Question 4: What are your views on Fixed Number Portability and the Authority’s proposals set out in Box 4 of this Draft Decision?

The intention of this response is to provide the Jersey Competition Regulatory Authority (“Authority”) with insights and views based on PXS’s extensive experience of designing, implementing, and operating Number Portability and switching services and regulations in over 40 jurisdictions globally – both in small- and large-scale markets. In the next paragraphs, these insights and views will be shared structured by topic.

Common Regulatory Practice

In its Draft Decision, the Authority states that further analysis and research on FNP has shown that FNP is common regulatory practice in comparable jurisdictions. PXS acknowledges and confirms these findings. In the EU, FNP has been mandated through the European Electronic Communications Code (“EECC”). As per Article 106 of the EECC, EU Member States are required to ensure that end-users with numbers from the national numbering plan have the right to retain their numbers, independently of the undertaking providing the service¹. This, irrespective of the type of phone number (e.g. mobile or fixed). Similar mandates exist in the UK and British Overseas Territories.

Moreover, the EECC and UK OfCom’s General Conditions² has required providers of internet and telecommunications services to implement switching processes that go beyond Number Portability, now also covering internet services and bundled services. Consequently, this has been implemented in many European countries, among which Ireland where PXS has implemented Internet Access Switching.

Demand for Voice Services and Timing

Although the demand for fixed voice services may have been declining for many years, it is worth noting that fixed voice services remain essential for many businesses due to their reliability, security, and integration capabilities. Fixed voice lines are integral to complex telephony systems, including PBX setups and call

¹ [Directive \(EU\) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code](#)

² [A summary of Ofcom's rules for phone and broadband providers](#)

centers, which are still prevalent in many corporate environments. The ability for such end-users to switch provider while retaining their phone number(s) is therefore relevant. Without the ability to switch provider and retaining a number or numbers, (business) customers are not a liberty to choose the service provider of their liking, especially not after a certain period of time with the same provider. The difficulty of having to inform contacts and clients of changed numbers is considered a significant barrier to switch and negatively impacts competition. Moreover, the introduction of broadband access and consequently the availability of VoIP services over the past years has resulted in other providers of fixed voice services than the more traditional landline operators that provide(d) circuit switched telephony. However, for new (VoIP) entrants to flourish or even consider entering a market, a regulatory climate that fosters competition and lowers barriers is required. In a context of barriers, the lack of such new entrants may provide for a (partial) explanation of a decline in fixed voice service usage.

With regards to timing, and acknowledging that many comparable jurisdictions may have implemented FNP many years ago, PXS would like to point out that this doesn't mean FNP is no longer implemented. The Republic of Kosovo, a candidate EU Member State, has implemented regulations on Number Portability (both Fixed and Mobile) in 2023³ and is in the process of implementing the Number Portability service. Turks and Caicos Islands are in a similar position, as its national regulatory authority decided to implement both Fixed and Mobile Number Portability in 2022⁴. This despite a context where the penetration rates of mobile services are higher than those of fixed voice services.

More specific to the situation of Jersey, there are and have been jurisdictions that implemented FNP years after starting off with MNP. In the Republic of Trinidad and Tobago, FNP is close to a commercial launch in May 2025⁵ following the implementation of MNP in 2016. A similar scenario applies to the Isle of Man, where FNP was implemented in 2017 – about 8 years after the initial implementation of MNP.

What these jurisdictions have in common, is that they implement or have implemented a Number Portability service, irrespective of the type of number as it provides consumers freedom of choice and the ability to switch providers regardless of the nature of their voice services.

Implementation Considerations

In its Draft Decision, the Authority highlights multiple key issues that it considers relevant in the further development of policy on FNP.

First, PXS would like to point out and confirm that the technological solution to facilitate FNP between the operators is indeed readily available. Although the NPC is currently only used for MNP, enabling FNP is a matter of configuration. No significant investments are required from either the Authority or the Operators, and the additional operational costs are proportional. Considering that there may be other than the current Mobile Network Operators using the NPC (e.g., Operators of fixed voice services only) when FNP has been implemented, the total operational NPC cost is likely to be distributed among a broader group of Operators instead of the current 3 Mobile Network Operators.

Second, with regards to timelines, it must be noted that although adding FNP to the NPC is just a matter of configuration (and as such, a matter of weeks or months at maximum), PXS acknowledges that the implementation of FNP within the Operators domain may require more time. Based on experience in other implementation projects, an implementation time frame of 6 to 12 months should be considered.

³ [Regulation No. 58 Number Portability For The Subscribers Of Public Electronic Communication Services](#)

⁴ [DN-2022-3 | Number Portability Consultation Decision](#)

⁵ [Determination 2025/01 – Final Implementation of Fixed to Fixed Number Portability in Trinidad and Tobago](#)

Third, in terms of practicability and work program, the following should be considered as part of an FNP implementation program:

- Development of a (regulatory) framework for FNP
- Identification of retail and wholesale fixed porting and switching variants across the jurisdiction(s)
- Development of FNP Business Rules (i.e. porting process specifications) and Consumer codes of conduct
- Amendments to Number Portability Services Agreement between the NPC provider and the Operators
- Management of implementation project:
 - Project management program
 - Implementation of FNP in the NPC
 - Implementation of FNP processes (and routing mechanisms) by the involved Operators
 - Development and execution of FNP testing framework

Based on experience in other implementation projects (among which projects in the region), we can recommend an independent and experienced consultancy firm to support the Authority.

Fourth, PXS would like to point out that the current NPC service for MNP is currently deployed as a service for both the Jersey and Guernsey. Although from a technical point of view FNP can be implemented in the existing NPC for one of these jurisdictions only, PXS understands that the dynamics and conditions of the Jersey and Guernsey telecommunications markets may call for a joint approach. Guernsey and Jersey are highly interlinked because the Operators are active in both markets, whereby their dominance varies per market. Additionally, the NPC service currently provided is subject to a service agreement that spans both bailiwicks.

Further Clarifications or Input

We trust to have provided the Authority with relevant and helpful input in response to its Draft Decision. In case of a need for any further clarifications, please do not hesitate to contact us.