

Preventing anti-competitive winback tactics in Number Portability, Wholesale Line Rental and Carrier Pre-Selection

Decision Notice

March 2008

Malta Communications Authority

Valletta Waterfront, Pinto Wharf, Valletta VLT 01, MALTA

Telephone: +356 21 336 840

Fax: +356 21 336 846

URL: <http://www.mca.org.mt>

Table of Contents

1	Background	2
2	Applicable Services	5
2.1	Number Portability.....	5
2.2	Carrier pre-selection.....	6
2.3	Wholesale Line Rental	6
3	Responses to the Consultation	8
4	Prohibiting donor from contacting subscribers	9
5	Cancellations refused once application form is signed.....	11
6	Recipient not to accept applications to migrate back to donor or to another service provider.	13
7	Application forms clarification.	14
8	General.....	15
Annex A:	Proposed Amendments	17
Annex B:	Mobile Number Portability Application Form	19
Annex C:	Fixed Number Portability Application Form	20
Annex D:	Wholesale Line Rental Authorisation Form.....	23

1 Background

In November 2007, the Malta Communications Authority (MCA) published a consultation paper on preventing anti-competitive winback tactics in a Number Portability (NP), Wholesale Line Rental (WLR) and a Carrier Pre-Selection (CPS) environment. The main goal of this document was to seek the opinion of service providers and other interested parties on MCA's proposals to further curb anti-competitive winback tactics by donor¹ operators.

'Winback', in the context of this document, is the term used to describe a situation when telephony service providers initiate contact with subscribers who are, or previously were, subscribed to their services with the intention to dissuade them from leaving, or persuade them to return, during a stipulated period commencing from the signing of an application form pertaining to NP, WLR or CPS services.

As mentioned in the consultation paper, winback may cause competition problems and also aggrieve subscribers who receive unwanted calls from operators. Furthermore winback tactics targeted at clients who apply for these facilities are likely to reduce the benefits of competition to the wider general public that do not attempt to migrate to alternative service providers. Savings on operators' costs to engage in winback by offering special offers would also be distributed evenly to the benefit of their entire subscriber base.

By establishing a short timeframe preventing winback, the MCA is of the view that it would give the general public sufficient time to try the service without external pressure. Furthermore, if such winback tactics become common practice, customers could be discouraged from availing themselves of facilities such as NP, WLR and CPS due to the harassment that they may be subjected to.

¹ "Donor" denotes where an operator or service provider is the donor operator for number portability, or the losing operator in the case of carrier selection ("All Calls" option) or single billing wholesale line rental.

The MCA has already taken steps to prohibit winback in its report on consultation and decision entitled "Introducing Number Portability in Malta" published in March 2005, and a document entitled "Number Portability - Statement of Decision on Winback during and after the porting process" published in December 2006. In the document entitled "Report on Consultation and Decision on Wholesale Line Rental" the MCA also prohibits losing operators from contacting the customer for two months following notification of loss of service. Notwithstanding, the MCA is still receiving a number of complaints that operators are not following these regulations. Investigating winback allegations proved to be problematic due to divergent accounts of the sequence of events. In many cases the operator making an allegation had incomplete information, while the operator against whom an allegation was made found it difficult to prove its adherence to regulations. Individual subscribers may fail to collaborate when they are benefiting from offers made to them in the form of winback. Donor operators claimed that at times the subscriber was the one to initiate the request for an offer and counter-offer hence staging a winback situation to benefit from special offers.

The consultation paper proposed further measures designed to achieve a consistent prohibition of winback and to reduce the possibility for donor operators being falsely accused of deploying winback tactics. These measures could be initially perceived as non-consumer friendly; however, as described earlier, they are being introduced to complement competition to the benefit of the general public.

The principle measures proposed in the consultation paper were:

- Prohibiting NP, CPS and WLR donor operators from contacting migrated subscribers using these services for the duration of the ordering process and for two months after completion of the migration process.
- Recipient operators not to accept cancellation of instruction once application form is signed for the duration of the ordering process and for two months after completion of the migration of service.

- Recipient operators not to accept a subscriber migrating back to the donor or another service provider using the same facility for two months after completion of the migration of service.
- NP, CPS and WLR application forms to clearly indicate that once they are signed subscribers may not change the service provider using the same service for the duration of the ordering process and for two months after completion of the migration of service.
- The various decisions and specifications pertaining to these services shall be amended to reflect these measures.

2 Applicable Services

2.1 Number Portability

Number Portability, is a service which enables subscribers to retain their telephone number when subscribing to a different service provider.

Mobile Telephony Number Portability was introduced in Malta in April 2006. The implementation of this service is considered a success evidenced by the fact that since its introduction tens of thousands of subscribers have ported their numbers. Fixed Telephony Number Portability was introduced in early 2007 as a result of a new publicly available fixed telephony service provider entering the market. The uptake of fixed telephony number portability is also showing growth since its inception.

The clear indications that a number of new telephony providers shall be entering the market in the near future renders Number Portability an even more effective tool since it enhances competition.

The current legal position on winback in Number Portability is as follows:

The *Report on Consultation and Decision Introducing Number Portability in Malta* (March 2005)² Decision 10 states:

"The MCA directs that donor operators may not initiate contact with a subscriber who has requested number portability to discuss the advantages or disadvantages of changing operator nor make offers to such a subscriber that are not available to the generality of subscribers. Contacts to solve problems that affect the subscriber's service that have arisen during the porting process are allowed."

It should be noted that during the consultation and implementation phase of Number Portability all the participating service providers unanimously agreed

² URL: <http://www.mca.org.mt/infocentre/openarticle.asp?id=624&pref=1>

that such winback tactics should be prohibited. As mentioned earlier, the MCA also published a statement of decision in December 2006, with the objective to define in more detail the prohibitions on winback³. This decision included the prohibition of winback tactics by the donor operator during the porting process; it prohibits subscribers from porting again until two months have elapsed since the completion of the porting process; probation of winback during this period; and allowing written exit surveys to randomly-selected terminated subscribers who happen to have ported their number.

In terms of the above decisions subscribers were still allowed to cancel their instructions requesting number portability before the porting process is completed.

2.2 Carrier pre-selection

Carrier Pre-Selection (CPS) is a service which enables subscribers to choose in advance an alternative fixed telephony service provider to carry their calls without the need of dialing in a prefix or installing any new equipment in their premises.

CPS also involves the exchange of customer instructions between operators in a way similar to number portability. The current regulations, which in the case of CPS do not cover any winback measures, are given in Report on Consultation and Decision May 2004⁴.

2.3 Wholesale Line Rental

Single Bill Wholesale Line Rental (SB-WLR) enables service providers to rent access lines from the fixed incumbent at wholesale prices to be able to offer an own branded telephony service to subscribers providing a single bill covering both line rental and telephone calls.

³ A Communications Appeals Board decision relating to the prohibition of exit surveys in this document is pending at the time of publishing

⁴ <http://www.mca.org.mt/infocentre/openarticle.asp?id=434&pref=1>

The current legal position on winback in an SB-WLR environment can be found in Paragraph 13 of Appendix 1 of the Consultation and Decision on Wholesale Line Rental dated 11 July 2007⁵.

13. Subscriber Contact:

"The Operator will handle all subscriber contact for SB-WLR. A Losing Operator will not have any contact with subscribers for SB-WLR until a period of two (2) months has elapsed following notification of the loss of service, except in the following circumstances:

(a) when sending the subscriber a one-time unsolicited anti slamming letter within five (5) days following notification of the loss of service. This unsolicited contact with the subscriber must take the form of the anti-slamming letter in Appendix 10.

(b) where necessary in relation to all appointments, changes to appointments and access arrangements with the subscriber for on-site engineering visits from Maltacom representatives on behalf of the Operator;

(c) where the subscribers avail themselves of services from Maltacom that are directly billed to them by Maltacom;

(d) where the Operator requests Maltacom to contact the SB-WLR subscriber directly; or

(e) to assist with the provision of service and/or maintenance or repair, provided that such contact is necessary for, and is limited to, the carrying out of such maintenance or repair.

If a subscriber contacts Maltacom with queries applicable to a SB-WLR account, Maltacom will direct the subscriber to contact the operator providing the service for assistance.

The above contacts from the subscriber cannot be used as a winback opportunity unless the subscriber specifically requests information in relation to services offered.

When all existing Maltacom services are converted to SB-WLR, Maltacom's contract with the subscriber will be terminated.

Thus in summary winback is already prohibited for two months from the point where Go Plus (Maltacom) is notified of the loss of service. Nevertheless before this decision was published subscribers were still allowed to cancel their instructions at any time.

⁵ <http://www.mca.org.mt/infocentre/openarticle.asp?id=1070&pref=1>

3 Responses to the Consultation

The consultation period of the Consultation Paper entitled "Preventing anti-competitive winback tactics in a Number Portability, Wholesale Line Rental and a Carrier Pre-Selection environment" ran from 22nd November 2007 to 21st December 2007.

Responses were received from:

- Sky Telecom
- Vodafone Malta
- GO
- Melita

The MCA wishes to thank all these parties for their responses.

4 Prohibiting donor from contacting subscribers

In its consultation the MCA proposed that donor operators shall not contact the subscriber from the time it is informed that the subscriber decided to change the account and up to two months after the account is closed or modified.

One of the respondents suggested that there needs to be a mechanism for the donor to acknowledge receipt of such an application within a timeframe of 12 hours.

Two of the respondents suggested modifying the text in the decision to avoid problems of interpretation and for clarification purposes.

Another respondent proposed that the winback period be extended from two months to six months. They claim that this would be beneficial to both operators and consumers.

Another respondent agrees with the measure being proposed by the MCA.

The MCA considered this feedback and has determined that:

- since the timeframes for ordering processes vary from one service to another, a process involving a donor operator acknowledging an application by means of a receipt cannot be implemented for all the services that are involved. Some of the current processes already require the donor to respond to the recipient operator within a shorter time period. *e.g. Mobile Number Portability Ordering Process Specification*⁶. Such a proposal could however be considered during service specific steering group meetings that are organised amongst stakeholders with the objective to update the respective specifications.

⁶ <http://www.mca.org.mt/infocentre/openarticle.asp?id=708&pref=2> page 24 (7.2.2)

- the original text of the proposed 'Decision 1' of the consultation paper shall be altered to avoid problems of interpretation and for clarification purposes as suggested.
- extending the winback period from two months to six months is outside the scope of this decision. Furthermore, another respondent is of the opposing view that subscribers should be allowed to revert back to their donor operator at any time.

Decision 1:

Where an operator or service provider is the donor operator for number portability; or the losing operator in the case of carrier pre-selection ("All Calls" option) or in the case of single billing wholesale line rental, it shall not contact the subscriber from the time when it is first informed by the recipient operator in possession of the correctly filled in signed application form confirming the subscriber's decision to change the account, and up to two months after the account is closed or modified.

The exceptions allowed for customer contact in the existing decision on SB-WLR, and any other exceptions allowed in the number portability specifications would still apply.

5 Cancellations refused once application form is signed.

The consultation paper also proposed that once subscribers sign the application form for NP, CPS or WLR, the recipient operator shall not accept the cancellation of the same instruction request during the ordering process.

Whilst most of the respondents agreed with this proposed decision, one of the respondents disagreed, claiming that there are several instances where subscribers change their mind of their own free will, and that it is a consumer right that should not be touched. The respondent submitted that that the MCA does not, and should not have, the power to impose such a condition. The same respondent stated that other legal "horizontal" consumer protection provisions cannot be easily removed in specific markets. It suggested that alternative measures should be explored, such as an industry code of practice. It also proposed to restrict the facility of using NP, CPS and WLR to not more than twice per type of service in a calendar year.

The MCA recognises the above respondent's concerns to safeguard consumer rights; indeed, the primary goal of this decision is precisely that to safeguard the consumer for the reasons described earlier in the 'background' section. What the MCA is proposing is merely to include the ordering process within the timeframe during which the subscriber is restricted from reverting back to the donor or another service provider. The MCA reiterates that subscribers can at any time terminate their subscription with the recipient operators; it is only prohibiting them from using the same facility in the case of NP, WLR or CPS. When other legal consumer provisions are applicable, such as in the case of the Doorstep Contracts Act, such legal provisions would take precedence over this decision.

As mentioned earlier, extending the winback period from two months to twice per calendar year is outside the scope of this document.

Due to the large number of winback allegations which occurred, notwithstanding that winback has not been permitted as per the NP and WLR/CPS decisions, the MCA is of the opinion that in this case an industry

code of practice would not bear the desired results although generally the MCA encourages and is receptive to this course of action.

Decision 2:

Once subscribers have signed the application form pertaining to Number Portability, Wholesale Line Rental or Carrier Pre-Selection ("All Calls" option), recipient operators shall not accept the cancellation of the instruction request during the ordering process, i.e. between the time the application form is signed until the request is implemented or rightfully refused by the operator or service provider to which the request is directed.

Subscribers can terminate their subscription at any time subject they do not migrate back to the donor or service provider using the same facility.

6 Recipient not to accept applications to migrate back to donor or to another service provider.

In the proposed decision it was proposed that the recipient operator shall not accept the migration of a subscriber back to the donor or to another service provider using the same facility for a period of two months after completion of the migration process.

A number of respondents agreed with this decision; however one showed concern that in the past human errors resulted in erratically filled application forms. Another respondent disagreed and reiterated that subscribers should be restricted the facility of using NP, CPS and WLR to not more than twice per type of service in a calendar year. However another respondent disagreed with this, furthermore it believed that the MCA should reconsider the imposition of prohibiting migration using the same facility within the two month period. It believed that this measure is not required to ensure the ending of anti-competitive winback activities.

Whenever application forms are filled in erratically they would be deemed null and void, in this case subscribers would not have to wait two months to migrate back.

Evidently service providers have different views with regards to the restricted timeframe that is established for migrating subscribers to make use of NP, CPS or WLR services again. Since the two month timeframe starting from when the new service is in place has been addressed in both the NP and WLR decisions as stated earlier, the MCA is of the opinion that this regulation should be retained.

Decision 3:

The recipient operator shall not accept the migration of a subscriber back to the donor or to another service provider using the same facility for a period of two months after completion of the migration process.

7 Application forms clarification.

The consultation also proposed a decision stating that all application forms shall clearly indicate that once the forms are duly signed, applicants cannot change the service provider within the set timeframe.

Most of the respondents agreed with this decision.

The same respondent which stated that the MCA should not restrict the right of subscribers to change their minds within two months of activation of NP, CPS and/or WLR, stated that if this restriction shall still apply, the MCA should specify the wording to be used, such that subscribers see a standardised and clear text.

To this effect the MCA decided that the decision should read as follows:

Decision 4:

All application forms pertaining to Number Portability, WLR and CPS shall include the following text in a clear and more pronounced manner to the generality of the text present in the form and in the immediate area of the signature:

"I hereby declare that I am aware that after signing this application form, the recipient operator shall not accept another application on my behalf to migrate back to the donor, or to another service provider for the same facility during a period of two months after completion of the migration process."

8 General

Besides providing feedback to the specific decisions in the consultative paper, some of the respondents also provided some comments of a general nature. All the respondents agreed in principle that the issue of unlawful winback activities needs to be addressed, especially taking into consideration that new entrants are envisaged to enter the market in the near future. One of the respondents commented that winback reports filed to the MCA do not necessarily correlate to the extent of the problem, and that measures and safeguards must not be designed to have negative effects on the industry in other areas. One of the operators insisted that oral exit surveys should not be considered winback as referred to in the winback statement of decision published in December 2006 and another respondent commented that it agreed with functional separation and disagrees with preventing customers from initiating a further NP request within two months.

Decision 5:

Without prejudice to the generality of the above decisions, in order to avoid any inconsistencies between these decisions and the respective decisions already published by the MCA, these are being amended as detailed in Annex A, B, C and D to this document.”

The MCA believes that the added measures presented in this document should achieve a consistent prohibition of winback in all the circumstances by amending the current winback regulations to clearly extend their applicability on a uniform basis to Number Portability, WLR and CPS and prohibiting customer migration to the donor or any other service provider from the time the customer signs the instruction or application form.

Joseph V Tabone

Chairman

5th March 2008

Annex A: Proposed Amendments

Amendment A.1: Decision 10 of the published document entitled 'Introducing Number Portability in Malta Report on Consultation and Decision' is being amended to read as follows:

"The MCA directs that donor operators may not initiate contact with a subscriber who has requested number portability to discuss the advantages or disadvantages of changing operator, nor make offers to such a subscriber that are not available to the generality of subscribers. Contacts to solve problems that affect subscriber's service that have arisen during the porting process are allowed.

Commencing as from the signing of the Number Portability Application Form, recipient operators shall not accept requests from other operators or the subscriber to cancel the porting request, or port the respective number again, until two months have elapsed from when the porting is functional."

Amendment B.1: Paragraph 13 of Appendix 1 to the Reference Wholesale Line Rental Offer detailed in Annex A of the 'Report on Consultation and Decision of the Wholesale Line Rental' is being amended to read as follows:

"The Operator will handle all subscriber contact for SB-WLR. Users subscribed to a SB-WLR service provider should not be able to subscribe to another SB-WLR service provider, or subscribe back to the Losing Operator, from the moment when the WLR application form is signed until two months have elapsed from when the migration is implemented. A Losing Operator will not engage in any contact with subscribers for SB-WLR during this period except in the following circumstances: ..."

Amendment B.2: Clause (b) of Appendix 7 to the Reference Wholesale Line Rental Offer detailed in Annex A of the 'Report on Consultation and Decision of the Wholesale Line Rental' is being deleted.

Proposed Amendment C.1: All ancillary documentation, including the various published specifications, pertaining to Number Portability, Wholesale Line Rental and Carrier Pre-Selection is being updated to reflect the principle

that donor operators are prohibited to initiate contact with customers availing themselves from such services from the moment of the signing of the application form of the pertaining service and up to a period of two months following the functional use of the same service; and the subscriber may not migrate back to the donor or to another service provider using the same facility for a period of two months after completion of the migration process.

Annex B: Mobile Number Portability Application Form

Operator Logo	Mobile Number Portability Application Form		
Company Name	<input style="width: 200px;" type="text"/>	C Reg No	<input style="width: 100px;" type="text"/>
Customer Name	<input style="width: 200px;" type="text"/>	Surname	<input style="width: 150px;" type="text"/>
Address	<div style="border: 1px solid black; height: 50px; width: 100%;"></div>		
Tel	<input style="width: 150px;" type="text"/>	ID Card No	<input style="width: 100px;" type="text"/>
Fax	<input style="width: 150px;" type="text"/>		
Request Date	<input style="width: 50px;" type="text"/> / <input style="width: 50px;" type="text"/> / <input style="width: 50px;" type="text"/>	Request Time	<input style="width: 50px;" type="text"/> : <input style="width: 50px;" type="text"/>
Porting Mobile Number	<input style="width: 150px;" type="text"/>	Single Line ?	Prepaid ?
		Multi Line ?	Postpaid ?
Account Number	<input style="width: 200px;" type="text"/>		
	Yes	No	N/a
ID Check	?	?	?
CLI Check	?	?	?
Bill Check	?	?	?
<p>The Malta Communications Authority wishes to advise the customer that <i><Donor Operator Name></i> is not allowed to initiate contact with him/her from when he/she signs this application form, including a period of two months commencing from when the porting has been successfully completed, or one week in cases where the porting request has been declined. The subscriber should report any violations of this requirement to <i><Recipient Operator Name></i>. Subscribers may nevertheless contact <i><Donor Operator Name></i> if they wish to do so.</p>			
<p>Terms & Conditions:</p> <ol style="list-style-type: none"> 1. Customer is rightful owner of the mobile number stated above. 2. In the case of prepaid connections, any unused prepaid balance with the Donor Operator will be lost on porting. 3. Any messages on the Voice Mailbox of the Donor Operator will be lost. 4. Any undelivered SMS and MMS on the mobile number stated above will be lost after the porting process is complete. 5. In the case of postpaid connections, the balance due to the Donor Operator is duly paid. 			
<p>Data Protection Clause:</p> <p><i><Operator Name></i> processes personal data in line with the Data Protection Act (2001). Personal data provided to <i><Operator Name></i> will be kept in confidence and processed in order to render and/or improve the service you have requested. Personal data shall not be transferred to any third party unless requested by you or permissible according to the law. You have the right to require access to your personal data as well as the right to rectify, or, in appropriate circumstances, erase any inaccurate, incomplete or immaterial personal data processed by <i><Operator Name></i>.</p> <p>Please note that in compiling this form you should provide personal data that is correct and accurate in order to be matched with any data held by the Donor Operator for validation purposes.</p>			
<p>Declaration</p> <p>I hereby declare that I authorise <i><Operator Name></i> to act as my/our Porting Agent for the mobile number listed on this document and am duly authorised to consent <i><Operator Name></i> to act as my porting agent. I also declare that I am the legal owner / signatory / duly authorised for the mobile number stated above and that all the information above stated is correct. I also understand that all actions linked to the porting process are subject to the Terms and Conditions stated on this document.</p> <p>I also hereby declare that I am aware that after signing this application form, <i><Operator Name></i> shall not accept another application on my behalf to migrate back to the donor, or to another service provider, using number portability for a period of two months after completion of the migration process.</p>			
Customer Signature	<input style="width: 200px;" type="text"/>	ID Card No	<input style="width: 100px;" type="text"/>
<p>For Internal Purposes Only</p> <p>I hereby declare that I have carried out all the necessary checks related to the mobile number porting process in order to verify that the mobile number stated above can be ported.</p>			
Processed By	<input style="width: 200px;" type="text"/>	Signature	<input style="width: 200px;" type="text"/>

Annex C: Fixed Number Portability Application Form

Fixed Number Portability Porting Form

Kindly complete all fields as appropriate; otherwise we shall be unable to process your request for number portability. We shall also be unable to process your request if you do not attach a copy of all the relevant documents indicated at the end of this form.

Details of applicant

(Note: applicant must be a subscriber with an existing fixed line service provider)

To be completed by Individual Applicants

Name and surname _____

Installation address _____

I.D. card number / passport number and nationality _____
(Indicate passport number only if not in possession of a Maltese Identity Card)

To be completed by Corporate Applicants

Name of company/ other entity _____

Company / other entity registration number _____

Type of organisation (*eg Registered company or Other*) _____

Information regarding applicant's current fixed line account

Name of current fixed line service provider _____

Telephone number/s to be ported

Current fixed line account number

Nature of current fixed line account (*indicate whether pre-paid or post-paid*)

Applicant's Declaration

I, the undersigned, wish to apply for number portability in the manner indicated in this request form and agree to pay any relative charges.

I declare that I do not have ADSL service on the line that I am requesting to be ported in this request form.

I declare that I do not have a CPS service associated with my line.

I further understand and consent to the following:

1. If my number is successfully ported in the manner indicated in this request form, the existing contractual relationship that I have with my current fixed line service provider shall terminate forthwith. This shall however not affect any and all accrued or outstanding rights and obligations arising under such contract, which rights and obligations shall survive the porting so long as they are not inconsistent with it. I understand that in the event of such successful porting, this completed request form shall form an integral part of my contractual relationship with the Recipient Operator together with any other application form and/or conditions of service that Recipient Operator may publish from time to time.
2. By completing this form I hereby authorise the recipient operator to act as my mandatory vis-à-vis my current fixed line service provider and as such
 - a. to request such provider to close my current fixed line account;
 - b. to instruct such provider to apply an announcement stating that my number has changed; and
 - c. to do everything necessary to process my request in this form.
3. As soon as my current fixed line account is closed, I may lose any voice messages that may be stored in my voicemail.
4. As soon as my current fixed line account is closed, my current fixed line provider shall remove any entry/entries relating to my current fixed line account that I may have in any directory information service of such provider.
5. If my current fixed line account is pre-paid I will, as a result of porting, lose any unused credit that I may have remaining with my current fixed line provider.
6. My current fixed line provider shall be entitled, following the porting, to recover any equipment and/or wiring that I have been using in relation to my current fixed line account.
7. I understand that the donor operator is not allowed to initiate contact with me from when they are aware of my signed application form and for a period of two months after the porting has been successfully completed, and that I should report any violations of this requirement to the recipient operator. Nevertheless, I may contact the donor if I wish to do so.
8. **I hereby declare that I am aware that after signing this application form, the recipient operator shall not accept another application on my behalf to migrate back to the donor, or to another service provider using Fixed Number Portability for a period of two months after completion of the migration process.**

Signature

If you are completing this form in your own name as applicant please sign here:

Applicant's signature

Date

If you are completing this form on behalf of the applicant please sign here:

Representative's name (in BLOCK letters)

Representative's signature

Representative capacity

ID number of representative

Documents to be attached

Individual applicants

1. Copy of identity card / passport of applicant / applicant's authorised representative
2. Any power of attorney granted by applicant to authorised representative appearing on his / her behalf
3. Copy of bill or statement issued within the last 3 months prior to the date of submission request form.

Corporate applicants

1. Copy of identity card of applicant's authorised representative
2. Copy of bill or statement issued within the last 3 months prior to the date of submission request form.
3. In the case of corporate customers who are not companies (e.g. clubs), then the co evidence that the applicant is an authorised representative shall also be sent.

Annex D: Wholesale Line Rental Authorisation Form

WHOLESALE LINE RENTAL

Customer Authorisation Form [*Operator Brand Name - Optional*]

Single Billing Telephone Service

Customer/Company Name: _____

Address: _____

**GO/Maltacom
Account number(s):** _____

Please tick one box

Transfer all lines and associated ancillary services in the above account(s)

OR

Transfer only those lines and/or associated ancillary services listed on the attached form

I authorise GO/Maltacom to transfer the designated telephone lines and their associated ancillary services to my chosen operator [*or 'name of operator'*]. I understand that GO/Maltacom will activate a facility so that all calls on these lines will be handled by my chosen operator [*or 'name of operator'*] and this will override any alternative service provision options already in place. I am authorised to act on behalf of the household or company in this matter.

To ensure the efficient provision of facilities such as directory enquiries and telephone line fault handling, GO/Maltacom may retain the customer name, address and telephone service details. This data is also passed to the new operator [*or name of operator'*]. I consent to the retention and sharing of such data in order for service to be provided to me.

I understand that GO/Maltacom is not allowed to initiate contact with me from when it is aware of my signed application form and for a period of two months after the migration has been successfully completed, and that I should report any violations of this requirement to the my chosen operator [*or 'name of operator'*]. Nevertheless, I may contact GO/Maltacom if I wish to do so.

I hereby declare that I am aware that after signing this application form, my chosen operator [*or 'name of operator'*] shall not accept another application on my behalf to migrate back to GO/Maltacom or any other service provider for a period of two months after completion of the migration process.

Name & Surname (Please Print): _____

Signature: _____

Date: _____