



Office of the Director of
**Telecommunications
Regulation**

Changeover Process for Directory Information Access Codes

Consultation paper

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1. Introduction

The Director published Decision Notice D2/98 on “Numbering in Ireland for the 21st Century” in July 1998. This covered, inter alia, the matter of directory assistance codes. Decision Notice D2/98 led to the setting up of the Task Force on Numbering (TFN) which considered directory information services in more detail, including preparation of a number of documents on that subject. Subsequently, the ODTR issued its document ODTR 98/53 “Directory Information Access Codes”, dated November 1998, which invited applications for the new 118XX series of codes that was proposed in Decision Notice D2/98.

In respect of the implementation of competitive directory information services, issues have arisen concerning withdrawal of the present 119X directory enquiry codes and also access from telephone call-boxes to directory enquiry services.

The Director is now undertaking this consultation, which sets out alternative solutions to resolve these issues and she invites responses from interested parties on each solution.

The closing date for receipt of comments is Monday 13 December 1999. Please see section 5 for details of how to submit comments on this paper.

2. Background

2.1 Decision Notice D2/98

Following the publication of a consultation document (ODTR 98/09) in March 1998 and careful consideration of the responses received, the ODTR published Decision Notice D2/98 – “Numbering in Ireland for the 21st Century” in July 1998.

In Decision Notice D2/98, the Director decided that:

- *the existing four digit directory assistance access codes of the form 119X would be withdrawn after a period of parallel running between the old 119X codes and the new 118XX codes of at least 12 months;*
- *the TFN would be asked to examine how best to allocate the new codes.*

2.2 The Task Force on Numbering

The TFN was set up as a telecommunications industry advisory group as an implementation of one Decision of Decision Notice D2/98. The TFN considered in detail how to implement the relevant directory assistance decisions of D2/98 and the following TFN documents contain its main deliberations on this matter:

- TFN21: TFN Recommendation 6, Directory Enquiry Services;
- TFN27: Agreed Minutes of Meeting No. 3 of TFN;

TFN21 recommended, inter alia, the following:

- *withdrawal of the existing 119X codes (i.e. 1190, 1197, 1198) should occur 12 months after a common commencement date for the new 118XX numbers. This commencement date should be at least 3 months after the allocation of the 118XX numbers; [Note: 118XX numbers were allocated on 25 January 1999];*

In TFN27 (Agreed minutes of TFN meeting 3):

- *ODTR clarified that the 3-month implementation period (see above) was intended only to ensure all operators had a chance to start from the same date;*
- *Telecom Eireann pointed out, and requested it be minuted, that:*
 - They could not guarantee to complete all payphone work during that period and they could not be held responsible for Directory enquiry problems arising as a result;
 - Directory enquiry calls from payphones are [i.e. were then] currently subsidised and that is [i.e. was then] unlikely to continue when other operators' services are being used.

2.3 Document ODTR 98/53

The document ODTR 98/53 "Directory Information Access Codes", which invites applications for directory access codes was issued (circulated and posted on the ODTR web site) on 19 November 1998. This document post-dated the deliberations of the TFN, mentioned above (as identified on Page 3 of ODTR 98/53). It stated:

- ***Date of Operation***
[118XX] Code allocations will be made to all initially qualifying applicants on the same notification date, 11th December 1998. The Director will also specify the date from when service may commence on the allocated codes.
- ***Withdrawal of Existing 119X Codes***
To provide continuity for consumers, the current 119X directory information access codes will continue in operation for a suitable period after the new 118XX codes have been allocated. Telephone directories published in 1999 should include the new 118XX access codes in place of the old 119X codes. The old 119X access codes will be withdrawn in January 2000.

2.4 Date of Changeover

The Decision Notice takes precedence over all other documents. However, it has been indicated to the ODTR that January 2000 may be a more satisfactory timeframe than 25 May 2000 (notified on 19 November to industry) for telecommunications operators to cease parallel running between 119X directory access codes and 118XX codes. Consequently 25 January 2000 is one date option considered herein.

3. Payphones

3.1 The payphones upgrade Problem

While changeover from 119X codes to 118XX codes can be affected on all ordinary telephones, a problem remains in respect of very many payphones.

Payphone services are provided by a number of operators, including Eircom. Most of the non-Eircom payphones are located in prime locations and are of modern construction. It is not clear what proportion of these can easily be adapted to handle the new 118XX directory access services, including the associated recorded announcements for withdrawal of 119X codes. The ODTR assumes that in general these will be able to cope with any decisions made in respect of Eircom payphones, where similar requirements would apply also to those other operators. Comments are welcomed in this regard from the operators concerned, if they foresee possible implementation difficulties.

Eircom's approximately 7,300 payphones are more widely distributed and many are of older construction. None of these is currently capable of handling the 118XX services and a replacement/upgrade programme will begin in January 2000, with completion currently expected in September 2000. Eircom is required under its public service obligations to ensure that directory access services are available from each of its public payphones. Because the directory access service from payphones is not differentiated from the same service using ordinary telephones, Eircom advises that this implies retention of the 119X directory access capability throughout the Eircom network until the whole payphone upgrade is complete.

The ODTR does not accept that this major impediment to withdrawal of the 119X service is acceptable and has been pressing for a workaround solution. One approach that has been identified is to prefix the new 118XX numbers with a code which is known to pass through the Eircom payphones (e.g. a 1850 code) and several such options have been pursued with Eircom. The dual advantages of this workaround are firstly that the access number for any operator's directory service can be appended to the selected prefix and secondly that it withdraws the 119X service from payphones very quickly. The disadvantage is the resulting extended number to be dialed by the customer.

A second option, still under detailed investigation, is to translate or otherwise link all 119X numbers to corresponding 118XX numbers in each relevant local exchange. This would allow 119X to be withdrawn from the general Eircom network by about May-June/2000, while allowing non-upgraded payphones to continue to offer directory assistance using the 119X code until they are progressively upgraded / replaced.

The ODTR is continuing to follow up these possibilities with Eircom.

In terms of recorded announcements for directory assistance calls made from Eircom payphones, two situations can arise; either the calls are dialed from an old-style payphone with one of the above workarounds or they are dialed from an upgraded payphone. In the former case there should be no recorded announcement as access is automatically made to a new 118XX number. In the latter case, as the completion date for upgrading the Eircom payphone network is unlikely to be significantly different from the withdrawal date of recorded announcements, the same redirection rules should apply as will apply to calls using ordinary telephones (see 4.2, below).

3.2 Payphone directory enquiries routing

Eircom does not currently charge for access to its own directory assistance services from its payphones and there is no agreement in place for access from its payphones to other directory assistance operators. Nevertheless, if one of the workaround solutions mentioned above is implemented then it could in principle be possible to re-route workaround directory assistance calls from payphones to any one of the 118XX services (i.e. not just Eircom's).

In the case of a prefix workaround option the customer would be able to directly dial a number that accessed any available directory access service, based on a set of numbers published, along with relevant charges (if any), within the call-box.

Agreement would be necessary between each directory access service concerned and Eircom, for use of Eircom's payphones.

In the case of code translation between 119X and 118XX the customer would continue to dial a 119X code but for practical reasons, only a single set of services would be available. There is an argument in favour of adopting some random distribution mechanism for Eircom payphone 119X directory assistance calls among all operators during this 119X transition period. However, on balance this seems undesirable as it would mean that some Eircom payphone customers who dial 119X receive free service while others are charged. Therefore the Director proposes that in the event of the second option workaround being implemented, all translated 119X codes sent from Eircom payphones during the interim period until payphone upgrade is complete, should point to some 118XX operator's services. The particular service selected for each payphone may be picked by some fair mechanism yet to be decided.

4. Issues for Consultation

4.1 Withdrawal of 119X service

The ODTR has received conflicting responses to its letter of 19 November. These indicate that some operators believe a May 2000 is appropriate as the earliest date for withdrawal of recorded announcements linked to 119X codes, whereas some others want withdrawal by January 2000. Furthermore, decisions need to be taken on the issues discussed above relating to upgrade of Eircom's payphones, which are currently incapable of supporting 118XX numbers.

The Director now seeks the preferences of those affected by the 119X code withdrawal timescale between the following options:

Option 1: To use a common withdrawal date for all operators of 119X codes of 25 May 2000. (Note: this option may imply use of the prefix approach to directory access numbers, pending upgrade of all Eircom payphones);

Option 2: To use a common withdrawal date for all operators of 119X codes of 25 January 2000, with the possible exception or delay of Eircom only if its payphone problem proves intractable. (Note: this option may imply use of the prefix approach to directory access numbers, pending upgrade of all Eircom payphones);

Option 3: To withdraw the 119X codes at the earliest date Eircom's payphone problem can be surmounted e.g. by an optimum combination of payphone upgrade and code translation (see 3, above).

4.2 Recorded Announcement Redirection

Recorded announcements may redirect callers of terminated 119X services to either the new 118XX services of the operator concerned or to the corresponding 118XX services of one or more other operators. The choice of this direction is of immediate commercial interest to operators. At least one directory assistance operator has no network of its own and other directory assistance operators have no existing 119X service. The issue of fairness therefore arises if a 119X operator's announcement simply redirects all calls to the 119X code to its own new 118XX service. There are technical difficulties as well as customer-friendliness problems associated with long or complicated announcements.

The Director now seeks the preferences of those affected by recorded announcements related to withdrawn 119X codes between the following options:

- Option 1:*** To require that all recorded announcements list all available 118XX directory services for that coverage (i.e. Ireland or International, as appropriate);
- Option 2:*** To require that all recorded announcements list at least the relevant 118XX service operated by the network operator concerned as well as information on the corresponding service operated by any directory assistance provider without a network of its own;
- Option 3:*** To require all recorded announcements to select the 118XX service to which the caller is redirected by means of a statistical method or by strict rotation between all suitable services;
- Option 4:*** To require only Eircom (as the dominant operator) recorded announcements to select the 118XX service to which the caller is redirected, by means of a statistical method or by strict rotation between several or all suitable services;

4.3 Upgrading of Payphones

The Eircom payphone problem is described in detail above, along with possible solutions and implications.

The Director now seeks the preferences of those directory assistance providers affected by upgrading of Eircom's payphones, including any interim solutions adopted, between the following options:

- Option 1:*** To await the full upgrade of Eircom's payphones in the normal manner, though accelerated as far as possible (Note: as described above, this has implications for the withdrawal date of 119X codes from the whole Eircom network);
- Option 2:*** To implement the fastest combination of payphone upgrade and 119X to 118XX translation programme that can be managed;
- Option 3:*** To add the shortest (free) code prefix transmissible by Eircom payphones to all relevant 118XX numbers when dialed from Eircom payphones (Notes: the viability of various prefixes is currently being pursued with Eircom. This solution and option 4 are expected to provide the fastest solutions);
- Option 4:*** To add a 1850-type prefix to all relevant 118XX numbers when dialed from Eircom payphones and require Eircom to pass these to the relevant 118XX directory assistance services. (Notes: This prefix must be passed through Eircom payphones. Their use implies a 10-digit number must be dialed by the customer. This solution and option 3 are expected to provide the fastest solutions).

4.4 Notices in Payphones

Posted notices of directory service numbers in public payphones are of advantage to those services listed in the notices. An issue of fairness arises in respect of those services which are not listed. Note: The Director's response to answers to the following questions will be conditioned by the particular solution adopted to the Eircom payphones problem described above.

The Director now seeks the preferences of those affected by such indirect advertising of directory assistance services between the following options:

Option 1: To require that all Irish directory assistance services should be listed in all in-payphone notices;

Option 2: To require that the preferred directory assistance services of the payphone operator as well as those of operators without payphone services should be listed in all in-payphone notices;

Option 3: To require that the preferred directory assistance services of the payphone operator as well as those of at least one competing service should be listed in all in-payphone notices;

Option 4: To leave it to each payphone operator to decide which services to publicise.

5. Submitting comments

The consultation period will run from 1 December 1999 to 13 December 1999, during which the Director welcomes written comments on the issues raised in this paper. Having analysed and considered the responses received, it is the intention of the Director to issue a Decision Notice as quickly as possible thereafter. The ODTR will publish the names of all respondents and may decide to summarise the responses received as part of its report on the consultation.

All comments are welcome, but it will make the task of analysing responses easier if comments are provided in the simple format shown herein, or at least if they are referenced to the relevant item numbers from this document. The ideal response in each case is a selection of one option, accompanied where necessary by some very short text. The ODTR will make copies of the comments available for public inspection at its offices.

All responses pursuant to this consultation should be clearly marked "Submission re Directory Assistance access Consultation – ODTR 99/72 and sent by post, facsimile or e-mail to:

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To arrive on or before 17.00 on Monday, 13 December, 1999

Apart from acknowledging responses, the Director regrets that she will be unable to enter into correspondence with persons contributing comments on this consultation paper.

Office of the Director of Telecommunications Regulation
1 December 1999

This consultation paper does not constitute legal, commercial or technical advice. The Director is not bound by it. The consultation is without prejudice to the legal position of the Director or her rights and duties under legislation.