



Commission for
Communications Regulation

Consultation Paper

Draft Directions to Enable Opening of Access to VoIP Services based on 076 Number Ranges

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All responses to this consultation should be clearly marked:-
“Reference: Submission re ComReg 05/12” as indicated above,
and sent by post, facsimile, e-mail or on-line at www.comreg.ie
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Please note ComReg will publish all submissions with the Response to Consultation, subject to the standard confidentiality procedure.

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1 Executive Summary

In its response to consultation document ComReg 04/103, ComReg decided to designate a new non-geographic number range, based on the access code 076, for VoIP-based services. ComReg also decided in the document that the non-geographic settlement model (also known as the Number Translation Code model) should be used in respect of industry payments for calls to 076 numbers, with the retail tariff *ceiling* of this 076 range of numbers to be set at standard national rate. In ComReg 04/103, ComReg accepted the strong preference expressed in industry responses to be allowed to negotiate its own arrangements for opening access, though with the caveat that ComReg would intervene if this process was unduly prolonged.

As few signs of progress were noted in opening of 076 access, ComReg intervened in January by asking *eircom* to submit a proposal based on three separate price points (national, local, and sub-local (equivalent to the rate used for 1891 Internet access)). These rates were to be submitted by Thursday 27th January, in time for an industry-wide consultative meeting called by ComReg. *eircom* submitted its proposal on Friday 28th January, based on a single price point (sub-local or 1891).

On the 2nd of February 2005, a consultative meeting of members of the VoIP industry was held at ComReg's offices, following a widespread email invitation to all known interested parties. Of the 17 separate organisations that attended this meeting, both new and traditional voice service providers were represented. At this meeting ComReg presented its proposals for a choice of three initial price points. The meeting consensus was that a single retail price point for 076 calls was preferred as an initial starting point but no consensus could be reached on what that price point should be, with some attendees preferring local call rate and others preferring a sub-local rate (i.e. equivalent to *eircom*'s 1891 rate). A national rate was generally felt to be too high.

The meeting concluded on the basis that ComReg would now consider the outcome including how to handle the disparity of views on preferred price positions.

Following detailed internal discussions, ComReg has concluded that despite the meeting's preference for a single price point, it would be impossible to meet the needs of both groupings i.e. those preferring local and those preferring sub-local retail rates. Accordingly, ComReg concludes that offerings should be available for both of these values (based on 076-X and 076-Y¹) and in order for this to be implemented as quickly as possible it is necessary to direct those affected to undertake the necessary work. The outcome will:

- Offer enhanced choice to Service Providers (and through them to the consumer);
- Meet ComReg's stipulation in ComReg 04/103 that prices must not exceed national rate while also meeting industry's wish for local rate or less;
- Facilitate efficient billing of disparate rates (i.e. using separate 076 number ranges);
- Meet as closely as possible the wishes of industry to reduce the number of price points.

Having arrived at these conclusions on the framework, it is next essential to quickly move to the actual operational opening of services, based on the 076 numbers. From

¹ X and Y are any suitable digits; ComReg has proposed 3 and 6, respectively.

experience since October 2004, it is unlikely that timely progress will be made without Direction by ComReg. Accordingly, this consultation proposes a set of draft Directions aimed at moving the process forward and all interested parties are invited to submit their views on these.

2 Background

ComReg has designated a new non-geographic number range, based on the access code 076, for VoIP-based services and decided (in document ComReg 04/103) that the non-geographic settlement model should be used in respect of industry payments for calls to 076 numbers. In ComReg 04/103, ComReg accepted industry's preference to be given time to negotiate its own arrangements for opening access, though with the caveat that ComReg would intervene if this process was unduly prolonged.

In January, after little sign of progress in opening of 076 access, ComReg intervened by asking *eircom* to submit a proposal based on three separate price points (national, local, and sub-local (equivalent to an 1891 rate)). These rates were to be submitted by Thursday 27th January, in time for an industry consultative meeting called by ComReg. *eircom* submitted its proposal on Friday 28th January, based on a single price point (sub-local or 1891).

At the consultative meeting on 2nd of February 2005, the VoIP industry consensus was that a single retail price point for 076 calls was preferred but no consensus could be reached on what that price point should be. Some attendees preferred local rate while others preferred a sub-local rate (equivalent to the current 1891 rate). ComReg was then to consider how to handle the disparity of views on preferred price value.

Following detailed internal discussions, ComReg concludes that despite the meeting's preference for a single price point, it would be impossible to meet the needs of both groupings i.e. those preferring local and those preferring sub-local retail rates. Accordingly, ComReg further concludes that offerings should be available for both of these values and – bearing the divergence in mind - in order for this to be implemented as quickly as possible it is necessary to direct those affected to undertake the necessary work. The outcome will:

- Offer enhanced choice to the Service Provider (and via them to the consumer). Those preferring local or sub-local can each select to use the rate they prefer;
- Meet ComReg's stipulation in ComReg 04/103 that prices must not exceed national rate while also meeting industry's wish for local rate or less;
- Facilitate efficient billing of disparate rates (i.e. using separate 076 number ranges);
- Meet as closely as possible the wishes of industry to reduce the number of price points. Although the ideal of a single price point is not achieved, both suggested rates are sufficiently low as not to constitute a disincentive to calling 076 numbers.

The Draft Directions included in this document are narrow in their scope and they are addressed to a relatively restricted audience. They are aimed at minimising additional delays in the interests of competition in what is already a protracted timescale for opening VoIP services based on 076 numbers. In that context, and as prior consultation (in the form of an industry meeting) has already taken place on the broad issues covered, ComReg deems it appropriate and necessary to reduce its usual four weeks consultation period to two weeks.

Explanatory Note: It should be understood that this consultation and the draft Directions included in it are primarily concerned with PSTN-originated calls to VoIP services that use 076 numbers, i.e. inbound calls to 076 numbers. For these to function effectively, there must be contractual agreement concerning the retail amount charged by the PSTN originator to the caller, the termination amount paid to

the recipient VoIP service provider and the retention amount to cover the call originating operator and possible transit operators.

VoIP to VoIP calls are not affected by this document nor are calls to non-076 number ranges.

3 Directions & Consultation Issues

3.1 Reasons for Directions

Any-to-any connectivity (i.e. the ability to call any telephone number from any other number) is the backbone of the telecommunications system in Ireland and this must be maintained within the new convergent communications world of Internet and PSTN. Ensuring that the 076 range of numbers for VoIP-type services works efficiently from end to end for callers is one step towards this objective. Consequently, it can not be open to undertakings to select which number ranges they wish to provide access to, nor acceptable for access providers to delay the opening of number ranges. Recognising these positions, it is also important in meeting them that the rights of all to work within a framework that recompenses them fairly for their services should not be prejudiced. ComReg's draft Directions listed below are therefore aimed at moving forward such a framework in a way that benefits all undertakings fairly while simultaneously bringing the undoubted benefits of VoIP to the consumer without further delay.

3.1.1 *eircom's position*

eircom is in favour of early introduction of VoIP but considers, for various reasons, that it should be based on a single price point based on the current retail rate for 1891 Internet access services. *eircom* also argues that this rate is beneficial to other providers.

3.1.2 *Positions of Other Undertakings*

A single rate was preferred by all who spoke. One undertaking expressed support at the industry meeting for *eircom's* position on that rate being sub-local, while most others preferred local rate (some having changed their views during the discussions). One undertaking appeared to doubt that local rate would provide sufficient returns under certain conditions.

3.1.3 *Commission's Position*

ComReg notes industry's preference for a single rate, which would provide the simplest offering for consumers to understand. However, there was no agreement on such a rate at the consultative meeting and ComReg concludes that as views are too far apart and as there are doubts about the best way to proceed, it makes sense to move to a fall-back position of two rates. This will allow all undertakings to work with the rate that suits them best, while also allowing them to change rates subsequently, if necessary². It is clear that local rate and sub-local rate (i.e. the '1891 rate') should be the two to be supported at this stage.

In any case, ComReg has already committed to a review of the operation of VoIP services by October 2005 and there will be an opportunity to make certain changes, which could include price points, at that time. ComReg also indicated at the consultative meeting that it would aim to do a (less comprehensive) review of the price point arrangements at an earlier stage in order to facilitate adjustments if it becomes clear this is desirable; this might occur within six months of opening of numbers.

² The current difficulties are a consequence of apparent limitations in operators' billing systems concerning depth of number analysis. ComReg accepts that these limitations currently exist when dealing with operations of scale, despite operators' abilities to do full number analysis in other situations. This is anticipated to be a short/medium term limitation only.

Although the issue of which numbers to use to identify the separate price ranges is purely an administrative decision, ComReg is open to industry inputs on such matters. ComReg proposes that initially number ranges behind 076-3 should be used to identify (for billing purposes) those services for which retail tariffs are at sub-local level, while 076-6 should be used for services charged at local level. These numbers allow for at least two alternative or additional services to be inserted at lower or higher retail tariffs than those currently foreseen, should the need arise later.

In order to assist swift activation of the 076 number range, to facilitate service providers who may wish to enter this particular market in the near future, ComReg is minded to Direct *eircom* on the specific timelines that should be used in amending the Reference Interconnect Offer (RIO) and Switched Routing and Transit Price List (SRTPL). All other undertakings should note that their input and co-operation will be needed if this number range is to be activated in as short a time frame as possible. Those undertakings should therefore:

- submit any comments on RIO service schedules and SRTPL as quickly as possible following their publication by *eircom*,
- sign and return their contracts as quickly as possible following their receipt from *eircom*;
- Commence building out 076 number ranges on their networks and adjusting billing and related systems immediately.

Note: As 076 number ranges were already allocated at the stage where it was foreseen that industry might quickly succeed in negotiations without need for separate price ranges, it will be necessary to recover such ranges immediately and re-allocate ranges falling into the categories described above (i.e. 076-3 / 076-6, or similar). However, as the former ranges appear not to be in operation yet, that should not be problematical.

Q. 1. Do you agree with ComReg’s proposal that two number ranges in the format 076X should be opened? Please provide reasons.

Q. 2. Do you agree that ComReg should issue directions to *eircom* relating to the process of introduction of these numbers for the purpose of ensuring their timely implementation? Please provide a reasoned answer and if you disagree, please provide an alternative.

ComReg has proposed to facilitate billing operations and number analysis, at least in the early stages of 076 use, by using the sub-ranges 076-3 and 076-6 to distinguish between the two price ranges of sub-local and local tariffs, respectively. This has the incidental additional benefit of enhancing transparency for users.

Consultation Question:

Q. 3. Do you agree that use of the sub-range 076-3 to signify sub-local retail tariff and 076-6 to signify local rate tariff is acceptable? If not please give reasons and your alternatives.

3.2 Directions

Draft Direction to all undertakings on opening of price points for 076 number range

Draft Direction No. 1. All undertakings providing caller access to 076 numbers are directed to set 2 initial price points to facilitate the introduction of VoIP services³. One price point will be known as “VoIP Local” and have per minute rates of 4.07c, 1.04c and 1.04c for daytime, evening and weekend respectively⁴. The second price point will be known as “VoIP Sub-Local” and have per minute rates of 1.61c, 0.80c and 0.80c for daytime, evening and weekend respectively⁵. These rates are quoted excluding VAT⁶.

Consultation Question:

Q. 4. Do you a) believe that Direction 1 above proposes appropriate rates for implementation? b) believe that it is clear, understandable and possible to implement? Please state the reasons for your opinions.

Draft Direction to *eircom* on submission and publication of retention rates

Draft Direction No. 2. *eircom* is directed to submit to ComReg retention rates in respect of the aforementioned price points, within 5 working days of the publication of this direction. *eircom* is to assume a call duration period of 3 minutes⁷ for both price points in the calculations included in this submission. The retention rate calculations for both price points should include *eircom*'s retails cost per call and bad debt recovery rates similar to those used with 1890 type calls.

Draft Direction No. 3. *eircom* is directed to publish its interconnection rates on its website within 2 working days of ComReg's written approval.

Consultation Question:

³ These are required initial points. Operators are encouraged to include additional price points subject to billing capabilities and normal operator interconnection negotiation.

⁴ Individual operators have different definitions of daytime, evening and weekend periods. ComReg does not anticipate that these different definitions need be altered in this context.

⁵ Operators are free to include or exclude these numbers from their discount schemes.

⁶ Likewise, individual operators have varying minimum call charges. ComReg does not anticipate that these need to be altered in this context.

⁷ Traffic over 076 numbers is expected to be voice rather than data. It is therefore appropriate that a standard voice call holding duration of 3 minutes is used to calculate retention rates. This assumption will remain in place until these price points are reviewed in 6 months time when a more appropriate call duration may be defined.

Q. 5. Do you believe that Directions 2 and 3 above are clear and understandable and that the timelines are achievable? Please provide reasons for your response.

Direction to *eircom* regarding the publication of amended service schedules in RIO

Draft Direction No. 4. *eircom* is directed to publish proposed textual amendments to the RIO within 5 working days of the publication of this direction. The text proposed in Annexes A and B should be used as a basis for these amendments.

Draft Direction No. 5. *eircom* is directed to publish the amended text within 2 days of its approval by ComReg, incorporating the amendments, if any, arising from the comments from OAOs.

Consultation Question:

Q. 6. Do you believe that Directions 4 and 5 above are clear and understandable and that the timelines are achievable? Please provide reasons for your response.

Direction to *eircom* regarding amended contracts

Draft Direction No. 6. *eircom* is hereby directed to issue suitably amended contracts to OAOs within 5 working days of the publication of this direction.

Consultation Question:

Q. 7. Do you believe that Direction 6 above is clear and understandable and that the timelines are achievable? Please provide reasons for your response.

Direction to *eircom* regarding the Switched Routing and Transit Price List

Draft Direction No. 7. *eircom* is directed to submit amendments to the SRTPL so as to incorporate transit to VOIP calls to ComReg, publish the proposed amendments on their website, and notify OAOs of these changes, within 5 working days of the publication of this direction⁸.

Draft Direction No. 8. *eircom* is directed to publish the SRTPL, incorporating the amendments arising from the comments of OAOs, within 2 working days of approval by ComReg.

⁸ If any undertaking wishes to comment on the proposed changes to the SRTPL, they should, for the purposes of expediency, respond to ComReg within 5 working days of the publication of said amendments.

Consultation Question:

Q. 8. Do you believe that Directions 7 and 8 above are clear and understandable and that the timelines are achievable? Please provide reasons for your response.

Direction to All Undertakings Providing Access to Telephone Users

Draft Direction No. 9. All undertakings are directed to open access to all operational 076 numbers, making necessary amendments to billing and other affected systems, within a timescale corresponding to the final publication of *eircom*'s SRTPL.

Consultation Question:

Q. 9. Do you believe that Direction 9 above is clear and understandable and that the timelines are achievable? Please provide reasons for your response.

4 Submitting Comments

All comments are welcome; however it would make the task of analysing responses easier if comments were referenced to the relevant question numbers from this document.

The consultation period will run **from 17 February 2005 to 03 March 2005**, during which the Commission welcomes written comments on any of the issues raised in this paper.

Having analysed and considered the comments received, ComReg will review the draft decisions and publish a report within the same month on the consultation, which will *inter alia* summarise the responses to the consultation.

In order to promote further openness and transparency ComReg will publish the names of all respondents and make available for inspection responses to the consultation at its Offices.

Annex A

SERVICE SCHEDULE XXX ***eircom VoIP Service***

This Service Schedule is effective from the date of signature of this Interconnect Agreement and shall remain in effect until amended following agreement of the Parties to such amendment or following determination by the National Regulator.

1. Definitions

- 1.1 In this Schedule, a reference to a clause or Appendix unless stated otherwise, is to a clause or Appendix of this Schedule. Words and expressions have the meaning given in Annex A.

2. Description of Service

- 2.1 Subject to the provisions of this Service Schedule, eircom shall convey eircom VoIP Calls handed over from the Operator Network to VoIP Services provided by eircom. This shall comprise all traffic with the digits "076" which have been allocated to eircom by the National Regulator.

3 Terms and Conditions

- 3.1 The Parties shall agree in advance all necessary technical requirements, including Call set-up and clear-down sequences, for the conveyance of Calls pursuant to this Schedule. This specification is identified in the Network Plan.
- 3.2 eircom shall convey eircom VoIP Calls during those periods of time and at the same standard and quality of service as eircom conveys similar Calls originated within the eircom Network.
- 3.3 Each Party shall correct faults which occur in its Network which affect the conveyance of eircom VoIP Calls in accordance with such Party's normal engineering practices. For the avoidance of doubt, neither Party warrants that its Network is, or will be, free from faults.
- 3.4 Calling Line Identity for network and presentation purposes shall, where available, be made available for all eircom VoIP Calls presented for delivery in the eircom Network.
- 3.5 Other terms and conditions will be added when developed and agreed by the Parties.

4. Routing

- 4.1 The conveyance of eircom VoIP Calls shall be in accordance with the routing principles specified in the Network Plan. All Calls covered by this Service Schedule will be carried on eircom billed Interconnect Paths.

5. Charging

- 5.1 For the delivery of eircom VoIP Service traffic from the Operator Network, the Operator shall pay eircom a charge per call and per minute calculated in accordance with the rates as specified in the *eircom* RIO Price List, Service Schedule 110 *eircom* VoIP Service as published from time to time. Traffic charging at each charge shall be based on chargeable cumulative seconds for each Billing Period rounded to the nearest minute.

EXAMPLE

Annex B

SERVICE SCHEDULE XXX ***Operator VoIP Service***

This Service Schedule is effective from the date of signature of this Interconnect Agreement and shall remain in effect until amended following agreement of the Parties to such amendment or following determination by the National Regulator.

1. Definitions

1.1 In this Schedule, a reference to a clause or Appendix unless stated otherwise, is to a clause or Appendix of this Schedule. Words and expressions have the meaning given in Annex A.

Retention Rate: is defined as the appropriate amount of revenue collected for the call that can be retained by eircom as the originating Operator.

Settlement Rate: is defined as the amount that is passed from eircom to the Operator for access to the service, for the origination and conveyance of a call. It is normally the difference between the revenue (usually gross retail revenue) collected minus the Retention Rate.

2. Description of Service

2.1 Subject to the provisions of this Service Schedule, The Operator shall convey Operator VoIP Calls originated in and handed over from the eircom Network for delivery to VoIP Services provided by the Operator. This shall comprise all traffic with the digits "076" which have been allocated to the Operator by the National Regulator.

3. Terms and Conditions

3.1 The Parties shall agree in advance all necessary technical requirements, including Call set-up and clear-down sequences, for the conveyance of Calls pursuant to this Schedule. This specification is identified in the Network Plan.

3.2 The Operator shall convey Operator VoIP Calls during those periods of time and at the same standard and quality of service as Operator conveys similar Calls originated within the Operator Network.

3.3 Each Party shall correct faults which occur in its Network which affect the conveyance of Operator VoIP Calls in accordance with such Party's normal engineering practices. For the avoidance of doubt, neither Party warrants that its Network is, or will be, free from faults.

- 3.4 Calling Line Identity for network and presentation purposes shall, where available, be made available for all Operator VoIP Calls presented for delivery in the Operator Network.
- 3.5 Requests to open services under this Service Schedule should be made using the "OLO Short Code, Geographic and Non-Geographic number range Activation Request Template" as available in appendix 12 of the Interconnect O&M manual
- 3.6 Other terms and conditions will be added when developed and agreed by the Parties.

4. Routing

- 4.1 The conveyance of Operator VoIP Calls shall be in accordance with the routing principles specified in the Network Plan. All calls covered by this Service Schedule will be carried on Operator billed Interconnect Paths.

5. Charging

- 5.1 For the delivery of VoIP Service Access traffic originated in the eircom Network, eircom shall retain an average retention charge per minute and per call calculated in accordance with the rates as specified in the eircom RIO Price List, Service Schedule 210 Operator VoIP Service as published from time to time.
- 5.2 Where the operator has decided to avail of Near End Hand Over, the Operator VoIP Service traffic settlement rate as provided in the Operator Price List will be recalculated on a quarterly basis. This recalculation will amend the settlement rates to reflect the actual hand off achieved in the network by the Operator for this service and the actual call holding times which will amend gross revenue and regulated retention by eircom for this service. .
- 5.3 The recalculation will be based on the actual Operator traffic for month 1 and the resulting Settlement Rate will be applied to months 4-6, provided the processes and approvals set out in the Operator Price List and the Switched Transit and Routing Price List are obtained in the timeframes set out therein. In the event that either the National Regulator or Operator fail to comply with the timeframes, the period to introduce the rate change shall be deferred until the 1st of the month after all approvals have been obtained. Price changes that are effective through these processes are exempt from the requirements of Clause 29.

**Consultation and Draft Directions to Enable Opening of Access to VoIP
Services based on 076 Number Ranges**

Appendix A – Legislation

Definitions

Access Regulations:	The European Communities (Electronic Communications Networks and Services) (Access) Regulations 2003. S.I. No. 305 of 2003
Authorisation Regulations:	The European Communities (Electronic Communications Networks and Services) (Authorisation) Regulations 2003. S.I. No. 306 of 2003
Act of 2002:	Communications Regulations Act, 2002
National Numbering Conventions:	Currently ComReg 04/35

Elaboration:

The National Numbering Conventions (currently ComReg 04/35) mandates the opening of all number ranges by all undertakings, thereby ensuring the successful operation of end-to-end communications. This long-standing and consumer-oriented requirement applies equally to 076-based numbers as to other ranges and ComReg believes the principle is widely supported by all.

This requirement is also backed up by Objectives set out for ComReg in Section 12 of the Act of 2002 and by Regulation 13 of the Access Regulations. ComReg believes the latter also empowers the Regulator to impose those obligations on an operator that are implied by the draft Directions included herein.

Any-to-any connectivity is the backbone of the telecommunications system in Ireland and this must be maintained in respect of 076-based numbers (i.e. it is not optional for service providers to choose which number ranges they wish to open). This feature, captured in the National Numbering Conventions (Conventions 3.2.2-5 and 3.2.2-6⁹), needs to be carried forward as current networks evolve and converge with next generation networks. Section 12 of the Act of 2002 sets this as an Objective to be achieved by ComReg in the context of contributing to the development of the internal market by encouraging end-to-end connectivity. The European Commission expects a similar result, as is made clear by Recital 38 of the Universal Service Directive (USD), viz “Access by end-users to all numbering resources in the Community is a vital pre-condition for a single market.”

ComReg has also been set two further and pertinent Objectives by the Act of 2002, as follows:

⁹ “...open access from their networks to all relevant numbers allocated by the NPM...”

- To promote competition, by ensuring users ... derive maximum benefit in terms of choice and price; and
- To promote the interests of users, who must have access to a universal service with promotion of clear information, in particular regarding tariff transparency and conditions of use

Regulation 6(1) of the Access Regulations reinforces the above Objectives of Act of 2002 by requiring ComReg to not only promote these Objectives but, where necessary, to ensure their implementation. Regulation 6(2) authorises the Regulator to impose obligations on undertakings controlling access to end-users, to the extent that is necessary to ensure end-to-end connectivity.

Regulation 6(3) in conjunction with Regulation 13 authorises the Regulator to lay down technical or operational conditions on operators to be met by the provider, beneficiaries, or both the provider and beneficiaries of such access in accordance with European Community law¹⁰, where necessary to ensure end-to-end connectivity and/or (in case of SMP) normal operation of the network. Furthermore, for operators with SMP,

Regulation 6(5) empowers the Regulator to take such steps either at the request of parties involved or at its own initiative.

The obligations imposed in accordance with Regulation 13 would ensure the meeting of reasonable requests for access to and use of specific network elements and associated facilities where the Regulator considers that the denial of such access or imposition of unreasonable terms and conditions would:

- a) hinder the emergence of a sustainable competitive retail VoIP market;
- b) not be in the interests of end-users, or
- c) hinder the achievement of the Objectives set out in Section 12 of the Act of 2002.

¹⁰ Obligations imposed shall be objective, transparent, proportionate and non-discriminatory

Appendix B – Consultation Questions

List of Directions

Draft Direction No. 1. All undertakings providing caller access to 076 numbers are directed to set 2 initial price points to facilitate the introduction of VoIP services. One price point will be known as “VoIP Local” and have per minute rates of 4.07c, 1.04c and 1.04c for daytime, evening and weekend respectively. The second price point will be known as “VoIP Sub-Local” and have per minute rates of 1.61c, 0.80c and 0.80c for daytime, evening and weekend respectively. These rates are quoted excluding VAT..... 9

Draft Direction No. 2. *eircom* is directed to submit to ComReg retention rates in respect of the aforementioned price points, within 5 working days of the publication of this direction. *eircom* is to assume a call duration period of 3 minutes for both price points in the calculations included in this submission. The retention rate calculations for both price points should include *eircom*'s retails cost per call and bad debt recovery rates similar to those used with 1890 type calls. 9

Draft Direction No. 3. *eircom* is directed to publish its interconnection rates on its website within 2 working days of ComReg's written approval. 9

Draft Direction No. 4. *eircom* is directed to publish proposed textual amendments to the RIO within 5 working days of the publication of this direction. The text proposed in Annexes A and B should be used as a basis for these amendments. 10

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Draft Direction No. 7. *eircom* is directed to submit amendments to the SRTPL so as to incorporate transit to VOIP calls to ComReg, publish the proposed amendments on their website, and notify OAOs of these changes, within 5 working days of the publication of this direction..... 10

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List of Questions

- Q. 1. Do you agree with ComReg's proposal that two number ranges in the format 076X should be opened? Please provide reasons..... 8
- Q. 2. Do you agree that ComReg should issue directions to eircom relating to the process of introduction of these numbers for the purpose of ensuring their timely implementation? Please provide a reasoned answer and if you disagree, please provide an alternative..... 8
- Q. 3. Do you agree that use of the sub-range 076-3 to signify sub-local retail tariff and 076-6 to signify local rate tariff is acceptable? If not please give reasons and your alternatives..... 8
- Q. 4. Do you a) believe that Direction 1 above proposes appropriate rates for implementation? b) believe that it is clear, understandable and possible to implement? Please state the reasons for your opinions..... 9
- Q. 5. Do you believe that Directions 2 and 3 above are clear and understandable and that the timelines are achievable? Please provide reasons for your response..... 10
- Q. 6. Do you believe that Directions 4 and 5 above are clear and understandable and that the timelines are achievable? Please provide reasons for your response..... 10
- Q. 7. Do you believe that Direction 6 above is clear and understandable and that the timelines are achievable? Please provide reasons for your response..... 10
- Q. 8. Do you believe that Directions 7 and 8 above are clear and understandable and that the timelines are achievable? Please provide reasons for your response..... 11
- Q. 9. Do you believe that Direction 9 above is clear and understandable and that the timelines are achievable? Please provide reasons for your response..... 11