



Commission for
Communications Regulation

Information Notice

Guidelines for VoIP Service Providers on the treatment of consumers

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An Coimisiún um Rialáil Cumarsáide

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1 Introduction

IP telephony (ranging from early Internet telephony to today's much more sophisticated VoIP offerings) has been available for many years but without impacting seriously on traditional telecommunications. This was largely due to limitations on the services themselves and also limitations of carrier and access facilities. That situation is now rapidly changing, due mainly to the wider dissemination of broadband services and advances in standardisation. Today, IP technology is making extensive inroads into internal carrier services and backbone networks, it is appearing at an ever-increasing rate in campus situations of many kinds (such as medium-to-large corporations, government facilities and academic installations) and it has commenced its advance on the general consumer marketplace.

One of the “killer” applications for IP technology is undoubtedly voice and it is therefore Voice over IP services (VoIP) that are now beginning to catch widespread public interest. Accordingly, it is unsurprising that the ITU, the European Commission and multiple national telecommunications regulators¹ have all already taken steps to acknowledge and/or welcome this technology which has the long-term potential to significantly enhance competition. The general expectation is that VoIP will lead to a combination of lower prices and an increase in the range of services available for consumers in due course.

It is necessary to ensure that the consumer is fully cognizant of the various differences – both positive and negative – that exist between VoIP and “ordinary” telephony. Where the consumer is fully aware of the features he/she is buying in the service being contracted, then satisfaction will be maximised and complaints minimised.

Accordingly, ComReg has prepared this set of non-binding guidelines on how Service Providers should interact with their customers and other SPs. While they are not intended to be exhaustive, these guidelines set out a basic framework whereby all

¹ As examples, see [“The Essential Report on IP Telephony”](#) from the ITU-T experts group and [“The treatment of Voice over Internet Protocol \(VoIP\) under the EU Regulatory Framework”](#) from the European Commission.

can benefit, and inconvenience or disappointment to both customers and operators is minimised.

Note: These guidelines are not binding on ComReg and are published without prejudice to its legal position generally and to its rights and duties to regulate the market generally where necessary and are without prejudice to, or in no way operate to alter any obligations, or rights (whether legal or other), of any person.

2 Scope of Guidelines

This set of guidelines applies when a Service Provider (SP) is engaged in providing telephony services to consumers in Ireland by means of a public packet data network, with inbound and/or outbound access to and from the PSTN².

ComReg recommends that a copy of these guidelines should be provided to any person who is a customer of or who is considering buying services from the SP. This can be done either by supplying a printed copy to that person or by publishing them with a prominent link on the SP's website. The SP can also link to ComReg's website, where a copy will be available.

² Services which do not access the PSTN are not regulated but SPs offering such services might still wish to follow this guide, where appropriate, as an indicator of good practice.

3 Objectives of Guidelines

The main objectives of these guidelines are:

- To promote the best interests of users of VoIP services by supporting the principle of a free and open market between individual participating SPs and between them and other providers of telecommunications services to the public;
- To ensure there is clear pre-contractual information readily available regarding the terms and conditions on which VoIP services are provided, including pricing, payment and service availability;
- To ensure there is clear pre-contractual information readily available that clarifies for consumers those characteristics of the SP's services that differ from those that might be expected by a traditional PSTN consumer; and
- To remind VoIP SPs of the importance of complying with their existing legal and regulatory requirements as detailed later in this document.

4 General Requirements

4.1 Customer contracts

Contracts offered to end-users by any undertaking providing connection or access to the public telecommunications network are required to comply with Section 17 of the Universal Services Regulations (S.I 308 of 2003). Apart from these guidelines, Service Providers (SPs) shall comply with all applicable legislation and other legal and regulatory requirements in Ireland. Compliance with these guidelines does not in itself necessarily amount to compliance with any legal or regulatory requirement.

In addition, Service Providers must ensure that:

1. the person entering into a contract is authorised to represent the customer in respect of telephone services, i.e. that he or she is the bill payer;
2. order forms and contract forms should be designed so that the contractual nature of these documents is clear to the customer and each contract form should contain a statement of the contractual nature of the document immediately adjacent to where the customer signs the document so the statement cannot easily be obscured or concealed³;
3. where a face-to-face approach to the customer takes place, the customer should be given the information set out in this paragraph, in writing, in a clear and comprehensible manner:
 - essential information including the identity of the company, its address, telephone, fax and e-mail contact details;
 - a description of the telephone service sufficient to enable the customer to understand the option that the customer has chosen, and how it works;
 - information about the major elements of the service, including the cost of any standing charges, the payment terms, line rental, and key types of calls;
 - the arrangements for provision of the service, including the order process and, as accurately as possible, the likely date(s) of provision. Where there may be significant delay in any likely date(s) of provision, the customer should be informed of this;
 - the circumstances in which the service may be withdrawn and the procedure for a withdrawal;

³ These forms must comply with Irish data protection legislation. See section 4.12 for further information.

- the existence of any right of cancellation and the process for exercising it;
 - the period for which the charges remain valid; and
 - the minimum period of contract, and minimum contract charges, if any.
4. Customers should be made aware of the existence of these guidelines and preferably should be provided with a summary.

In the case of internet orders, a well sign-posted hyperlink to the information required by paragraphs 4.1.2 to 4.1.4 above should be prominently displayed, with the information being suitable for easy downloading and printing.

4.2 Service provider details

Service providers should ensure that the following information is readily available to the consumer both at and following the point of sale:

- Who the SP is;
- What services it provides;
- How to contact the SP, with different contact information for different purposes, if necessary;
- How to contact ComReg and other relevant organisations; and
- A copy of these guidelines.

4.3 Promotion

SPs must ensure that their promotional material complies with all applicable legislation and non-statutory regulation, including that:-

- a. If transmitted by radio, television, teletext, telephone, facsimile, SMS or any other form of communication, it observes the provisions of these guidelines and any Codes of Practice published by the relevant broadcasting and other authorities (where relevant) in the manner most reasonable and appropriate to the technology employed;
- b. It complies with all relevant requirements of the Advertising Standards Authority; and
- c. Promotional material and all associated promotional services (as well as telecommunications services offered to the public, where relevant), comply with RegTel's Code of Practice when access is made via premium rated telephone services.

Promotional material must also comply with consumer legislation enforced by the Office of the Director of Consumer Affairs and the Office of the Data Protection Commissioner (see section 4.12).

4.4 Service reliability & quality

It is a condition of number allocation⁴ for numbers from geographic ranges that consumers are advised in their contracts of “limitations of their service ... vis-à-vis what those customers might legitimately expect compared with what would traditionally be expected from a PATS service”.

1. It is therefore recommended that the following message is included in the terms and conditions of all contracts for Electronic Communications Services” (ECS) IP telephony services which do not provide the same degree of network protection as that required in respect of Publicly Available Telephone Services” (PATS) services:

“IMPORTANT INFORMATION: This is a Voice over Internet service, and as such, it is dependent on your Internet connection and on the underlying network itself. Your service may cease to function if there is a power or other failure in that network.”

2. SPs should take active steps to draw their customers’ attention to any significant differences in service reliability between the SP’s VoIP service and circuit switched public telephony networks. This should be done at the point of sale and in any user guide issued by the SP. ComReg is of the opinion that this is especially important in the case where the SP has no control over the underlying access network.
3. SPs should also prepare potential new customers for any limitations on quality that they might experience in using the services provided, where these might otherwise be likely to lead to complaints or dissatisfaction. In particular, impacts of latency or problems associated with packet loss should be considered in this context. The customer must be advised of these issues at the point of sale.

One comparison that SPs could use is that with mobile telecommunications services. End-users are likely to be familiar with a mobile service being reliant on both available signal strength and the battery life of handsets.

4.5 Access to Emergency Calls

SPs offering services categorised as providers of PATS are obliged to ensure uninterrupted access to emergency services and also to ensure that end-users are able to call the emergency services (on both 112 and 999) free of charge⁵.

Although SPs that are categorised as providers of ECS but not as PATS may choose to offer or not to offer access to emergency service calls, it is ComReg's opinion that access to these calls should be facilitated where at all possible. Where access is offered, however, the reliability of this access may be affected by circumstances beyond the control of the SP, in particular by power failure or by failure of the packet data network. This section 4.5 is intended to ensure that VoIP SPs provide their customers with relevant information that enables them to understand the implications of using an ECS Voice over Data service.

End-users of both PATS and ECS services should also be clearly informed that nomadic⁶ use of their VoIP service may not influence where a call to the emergency services is directed, i.e. the call will most likely be directed to their "home" emergency services, rather than to the emergency services appropriate to their current location.

Note:

When providing information to customers about emergency access numbers, SPs should refer to the European harmonised '112' emergency code as well as the original '999' code.

4.5.1 Access to Emergency Calls by ECS SPs

Where the service does not provide access to '999' and '112':

1. Clear information to this effect must be provided to all potential users of the service at the point of sale; in any user guide issued by the SP;
2. The SP should supply stickers clearly indicating that calls to emergency services cannot be made from handsets connected to the service.

⁴ Decision 2(d) of 04/103 (VoIP Services in Ireland: Numbering and related issues).

⁵ Universal Service Regulations (S.I. 308 of 2003), Section 19(2) and 22(1).

⁶ Nomadic use of VoIP service allows users the freedom to roam from a regular home location, to any chosen new location at which they may use this service by installing and registering the VoIP phone at that location.

3. If the emergency numbers are dialled, the SP shall provide a network announcement, stating, “Calls to Emergency Services cannot be made from this handset, please hang up and redial from an alternative network”.

4.5.2 *Best Efforts Access to Emergency Calls (for ECS only)*

1. Where the service does provide access to ‘112’ and ‘999’ but does not offer substantially the same level of reliability as circuit switched public telephony, clear information to this effect must be provided to all potential users of the service in any user guide issued by the SP. The same information should also be included in materials describing the service that are made available to prospective customers in advance of the point of sale.
2. It is a strongly recommended practice, that where the service is expected to be significantly used in place of a Home Telephone in a residential environment, the SP will offer the customer a supply of stickers which clearly indicate that calls to emergency services may fail, in particular if there is a loss of power or a fault in the packet data network.
3. SPs should encourage customers to register their current address information with the SP so that this information may be passed to the emergency services where appropriate and necessary. This should be done in compliance with all existing Data Protection legislation (see section 4.12). ComReg encourages SPs to encourage this registration for all types of voice services offered, including those that are pre-paid as well as those services that are post-paid.

4.6 Information for customers

The materials describing the service that are made available by an SP to prospective customers in advance of the point of sale must clearly state if the following facilities are not available by means of the SP’s service:

- Access to Operator service (i.e. cases where important Operator telephone numbers are not provided by the SP to consumers; otherwise see 4.7 below);
- Access to DQ (i.e. cases where all DQ telephone numbers are not provided by the SP to consumers; otherwise see 4.7 below);
- Itemised Billing;
- Non-itemisation of “1800” free calls;
- Entry in the standard printed white pages directory;
- Text relay services;

- Withholding of Caller Line Identifier (CLI) information;

4.7 Access to Operator Assistance & Directories

1. It is a requirement of Regulations 21(2) of the European Communities (Electronic Communications Networks and Services) (Universal Service and Users' Rights) Regulations 2003 (the "Universal Service Regulations") that an undertaking assigning telephone numbers to subscribers shall "meet all reasonable requests⁷ to make available, for the purposes of the provision of publicly available directory inquiry services, directories and the record referred to in Regulation 4(3)⁸ the relevant information in an agreed format".
2. It is a requirement of Regulation 21(3) of the Universal Service Regulations that "an undertaking providing a connection to the public telephone network to end-users shall ensure that all such end-users can access operator assistance services and a directory inquiry service, in accordance with Regulation 4".

This means that any SP who offers a service that interconnects with the public telephone network (i.e. where an end-user can call ordinary telephone numbers) must also ensure that those end-users are able to access operator assistance services.

4.8 Calling Line Identification

SPs shall comply, where relevant, with the guidelines concerning Calling line Identification (CLI) as documented in the European Telecommunications Platform (ETP) Issue 4 of "Guidelines for Calling Line Identification" [document number (02)51]⁹.

See also Section 4.9.1, below.

4.9 SPAM Protection

1. Caller ID should be validated against the authenticated user to prevent fraud and spam. This can be done in the context of the aforementioned ETP guidelines.

⁷ This requested data may be provided on terms that are "fair, objective, cost-oriented and non-discriminatory"

⁸ This is subscriber data needed for the National Directory Database – NDD.

⁹ http://www.etp-online.org/downloads/02_051_CLI_Guidelines_Sep_2002.pdf

2. Every SP should develop an Acceptable Use Policy and require its customers to adhere to it. The Acceptable Use Policy should also include restrictions preventing bulk unsolicited voice calls, SPAM, by customers.

SPs should co-operate with each other in investigating and preventing instances of spamming and should have a nominated point of contact that will respond to and address these issues, when they occur.

4.10 Number Portability

According to current Irish legislation, SPs that provide PATS are obliged to offer reciprocal number portability to their customers. Similarly, an ECS VoIP SP assigning Irish telephone numbers to customers is obliged to offer number portability to those customers upon request by another VoIP ECS SP. An ECS VoIP SP is obliged to offer number portability to customers upon request by individual PATS providers in cases where those PATS providers confirm they are prepared to reciprocate with porting to the ECS VoIP SP concerned.

Number portability obligations are deferred for 076 numbers until a significant quantity of those numbers are in active use or until January 2007, whichever comes first.

A summary of the above is provided in the following table:

Type of Number	Type of SP	Number Portability	
		Accept	Offer
Geographic	PATS	From other PATS SP	To other PATS SP
	ECS	From other ECS SP	To other ECS SP
			To other PATS SP
076	PATS	From any SP providing 076 numbers	To any SP providing 076 numbers
	ECS		To any SP providing 076 numbers

If an SP is unable to offer a number porting facility, this must be clearly stated¹⁰ in all advertising and promotional materials describing the service that are made available to prospective customers in advance of the point of sale and in the SP's customer service contract.

¹⁰ Decision 6(a) of 04/103.

All number portability transactions with customers and other service providers must be undertaken in accordance with current legal and regulatory rules and guidelines and with industry agreed processes and procedures.

4.11 Pricing Information

1. SPs should ensure that charges for services are clearly stated in relevant promotional material, in addition to the customer services contract, and are readily available to customers. Retail prices should be quoted inclusive of VAT¹¹. Where additional charges (for example on-line charges), are payable, this should be stated.
2. SPs should ensure that pricing information is accurate and up to date¹².
3. If VoIP equipment is sold separately from the provision of a service, the price of the product sold should clearly indicate the final price in euro, including taxes, i.e. it should comply with EC (Requirements to Indicate Product Prices) Regulations, 2002.

4.12 Data Protection and Privacy

SPs shall comply with Irish legislation relating to the protection of information held in relation to Irish data subjects. All relevant legislation is detailed on the website of the Office of Data Protection¹³.

4.13 Premium Rated Services

1. It is a requirement of the Irish National Numbering Conventions that SPs offering on-line services should not provide access by end-users located outside the State to Irish Premium Rate Numbers (i.e. those number ranges commencing '15') unless the SP accepts direct liability for any consequent bad debt that arises as well as liability for any potentially unacceptable content being delivered across borders.
2. SPs providing access by Irish consumers to Premium Rated Services¹⁴ of non-Irish origins should provide information to their customers about the high charging rates being applied.

¹¹ This is a requirement of the Prices and Charges (Tax-Inclusive Statements) Order, 1973.

¹² Incorrect price indications may be a breach of Sections 7 and 8 of the Consumer Information Act, 1978.

¹³ <http://www.dataprotection.ie>

3. Customers should also be offered the option of barring access to such services.

4.14 Equal Status

To comply with the Equal Status Acts 2000 to 2004, an SP should take reasonable steps to enable customers with disabilities to make use of its services and to benefit from its individual Code of Conduct. To this end, SPs should take reasonable steps to follow accepted practices and standards of accessibility, such as:

- Producing all information in an accessible way, including the use of good line spacing, a reasonable sized font and sufficient contrast between type and background; and
- Following industry standard accessibility criteria for websites; these guidelines may apply to each SP's activities in the areas that it covers. An SP may of course adopt stricter standards if so required.

4.15 Consumer Legislation

What follows is a list of some of the legislation that is of particular interest to those providing services to consumers:

- Consumer Information Act, 1978
- EC (Misleading Advertising) Regulations, 1988
- Prices and Charges (Tax-Inclusive Statements) Order, 1973
- EC (Requirements to Indicate Product Prices) Regulations, 2002
- EC (Protection of Consumers in Respect of Contracts made by means of Distance Communication) Regulations, 2001
- EC (Directive 2000.31.EC) Regulations, 2003 (E-Commerce)
- EC (Cancellation of Contracts Negotiated Away from Business Premises) Regulations, 1989.

4.16 Illegal use of services

SPs must not promote the use of their services for illegal purposes and must take appropriate steps to guard against their services being used for such purposes.

4.17 Awareness

SPs must take appropriate measures to communicate to their staff the existence of these guidelines.

¹⁴ Services in this category include (a) services using foreign or international Premium Rate Numbers; (b) equivalent services - in terms of premium pricing and type of content - to Premium Rate Services, but using ordinary numbers with non-Irish country codes.

4.18 Redress

According to Section 28 of the Universal Services Regulations, “an undertaking shall implement a code of practice for handling complaints from end-users in respect of an alleged contravention of these Regulations”. This code of practice should make provision for the following matters:

- First point of contact for complaints;
- A means of recording complaints;
- A time frame within which the undertaking concerned shall respond to complaints;
- Procedures for resolving complaints;
- Appropriate cases where reimbursement of payments and payments in settlement of losses incurred will be made; and
- Retention of records of complaints for a period of not less than one year following the resolution of the complaint.

Notwithstanding these provisions, it should be made clear to end-users how they may go about making a complaint, the process and timelines to be expected and the subsequent organisations that they may appeal to should a resolution not be forthcoming.

Further guidance on how consumer complaints should be handled is available in the document “Codes of Practice for the Handling of Consumer Complaints by Telecommunications Operators” (ComReg document 01/67). Additional information on how tariffs should be presented is available in the ComReg document 04/86 “Code for Tariff Presentation”.

Annex 1: Definitions

“**Electronic Communications Services (ECS)**” means a service normally provided for remuneration which consists wholly or mainly in the conveyance of signals on electronic communications networks, including telecommunications services and transmission services in network used for broadcasting, but excludes:

- a. a service providing, or exercising editorial control over, content transmitted using electronic communications network and services; and
- b. an information society service, as defined in Article 1 of Directive 98/34/EC, which does not consist wholly or mainly in the conveyance of signals on electronic communications networks.

“**Publicly Available Telephone Service**” means a service available to the public for originating and receiving national and international calls and access to emergency services through a number or numbers in a national or international telephone numbering plan, and in addition may, where relevant, include one or more of the following services: the provision of operator assistance, directory inquiry services, directories, provision of public pay phones, provision of service under special terms, provision of special facilities for customers with disabilities or special social needs or the provision of non-geographic services or both.

“**Service Provider**” (SP) means an undertaking that is engaged in providing telephony services to consumers in Ireland by means of a public packet data network, with inbound and/or outbound access to and from the PSTN.

“**Public Switched Telephone Network**” means the collection of interconnected systems operated by the various telephone companies and administrations (telcos and PTTs) around the world.

Annex 2: Rights/Obligations of Publicly Available Telephony Service (PATS) v Electronic Communications Services (ECS)

<i>Obligations</i>	Au: Authorisation Regulations; US: Universal Service Regulations; A: Access Regulations; F: Framework Regulations	ECS	PATS
Notification to ComReg	Au 4 Any person who intends to provide an ECN or ECS shall, before doing so, notify the Regulator of his or her intention to provide such a network or service.	Yes	Yes
Contracts	US 17 An undertaking that provides end-users connection or access or both to the PTN shall do so in accordance with a contract.	Yes	Yes
Emergency Services	<p>US 19(2) An undertaking providing PATS at fixed locations shall take all reasonable steps to ensure uninterrupted access to emergency services.</p> <p>US 22(1) Operators offering PATS must ensure that their end-users are able to access free of charge the emergency numbers 112 and 999.</p> <p>US 22(2) Those operating PTNs (i.e. an electronic communications network which is used to provide PATS) must, as soon as practicable, make caller location information available to authorities handling emergencies, to the extent technically feasible, for all calls to 112 and 999.</p>	Best endeavours Best endeavours No	Yes Yes Yes
Number Portability	<p>US 26(1) Operators offering PATS shall insure that a subscriber to such service can retain his or her number independently of the undertaking providing the service.</p> <p>For the new '076' range, number portability will be required as soon as is practicable for both ECS and PATS.</p>	No	Yes
Integrity and Availability of Network	US 19(1) The regulator may specify obligations to be complied with by an undertaking operating a PTN at fixed locations, in order to ensure the integrity of the network and in the event of catastrophic network breakdown or in cases of force majeure, to ensure the availability of the PTN and PATS at fixed locations.	No	Yes

Transparency and publication of information	US 18(1) The regulator shall ensure that transparent and up to date information on applicable prices and tariffs, and on standard terms and conditions in respect of access to and use of pPATS is available to end users and consumers in accordance with this regulation.	Best endeavours	Yes
Quality of Service	US 18(4) The regulator may specify obligations to be complied with by an undertaking providing publicly available ECS requiring such undertaking to publish comparable, adequate and up to date information for end-users on the quality of its services.	Yes	Yes
Directory	US 21(1) An undertaking providing PATS shall ensure that its subscribers have the right, without charge, to have an entry in a directory and a directory inquiry service. Article 11 of the privacy directive (97/66/EC) also applies.	All reasonable requests	Yes
Access to directory enquiry and operator assistance services	US 21(2) An undertaking that assigns telephone numbers to subscribers shall meet all reasonable requests to make available, for the purposes of the provision of publicly available directory inquiry services, directories ... , the relevant information in an agreed format on terms that are fair, objective, cost oriented and non-discriminatory.	Yes	Yes
	US 21(3) An undertaking providing a connection to the public telephone network to end-users shall ensure that all such end-users can access operator assistance services and a directory inquiry service.	Yes	Yes
Security and Privacy Obligations	Articles 4, 5, 6, 7 and 9 apply to those providers of PTNs and ECS. These articles cover the technical and organisational measures that must be taken to safeguard the security of its services; as well as the storage and treatment of traffic data.	Yes	Yes
<i>Rights</i>			
Interconnection	A 5 Operators of public communications networks have the right and when requested by authorised undertakings an obligation to negotiate interconnection.	Yes	Yes
Numbers	F 22(3) The regulator shall, subject to ensuring the proper management of the national numbering scheme, grant	Yes	Yes

	rights of use for numbers and number ranges for all publicly available ECS in a manner that gives fair and equitable treatment to all undertakings providing publicly available ECS.		
Carrier Selection and Pre-Selection	US 16(1) Those entities classified as offering PATS may explicitly request access to carrier selection and pre-selection on the network of an operator that has been designated as having significant market power.	No	Yes
Number Portability	As above. Those service providers who expect to port numbers into their network must also be prepared to port numbers out of their network. This is known as reciprocal portability.	No	Yes
Directory	As above. Only subscribers of PATS have the rights to be listed in a public telephone directory.	No	Yes

It should also be noted that those entities who wish to be allocated numbers from the national numbering scheme must also abide by the National Numbering Conventions and any and all terms and conditions of use that accompany the said allocation.

This is not an exhaustive list of rights and obligations. Any entity wishing to operate as an ECS or PATS provider should ensure that they have a full understanding of the requirements which they will need to fulfill.