



Office of the Director of
**Telecommunications
Regulation**

IRISH NATIONAL NUMBERING CONVENTIONS CONSULTATION PAPER

Document No. ODTR 99/11

March 1999

Note:

This document constitutes Volume 1 of the 2-volume consultation package.
The draft National Numbering Conventions constitutes the second volume.

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0. The Consultation Exercise

0.1 Purpose of the Consultation

The liberalisation of telecommunications in Ireland has generated a large new demand for blocks of telephone numbers and short codes, within the framework of competing needs from different telecommunications operators. The initial surge of demand generated by the onset of liberalisation has now abated, but there remains a continuous ongoing demand for numbers to be issued, reserved, withdrawn and controlled in a reliable, transparent and equitable manner.

The responsibility for meeting this need falls on the Office of the Director of Telecommunications Regulation (ODTR).

The ODTR has concluded that it can best meet the requirements for fairness and transparency of operation by drafting a new set of rules that will govern the future management of the national Numbering Scheme. The initial draft of those rules, which is now presented as a companion volume to this consultation document, forms a first approach to what will be known as the Irish National Numbering Conventions.

The ODTR intends that conformity with these Conventions should be a licence condition for all operators and service providers. Accordingly, it is clearly important that all those affected by the Conventions should be given the opportunity to comment on and help optimise what will then become the governing framework within which they will operate in future, in respect of numbering.

The conventions also clarify the rights and conditions under which numbers are allocated to users.

0.2 Approach to the Consultation

The Conventions themselves consist of a very large number of highly detailed and individual (though often inter-related) rules and this necessitates a rather different approach than has been used in previous consultations, in which opinions on broad strategy issues have been sought. Nevertheless, all respondents should have the freedom to comment in a broad-brush manner as well as on a rule-by-rule basis.

The approach now adopted is to provide two documents, volume 1 (this document) and volume 2 which is the draft document. The numbering and section identification in both volumes is synchronised, to provide easy cross-reference. In that respect it should be noted that questions related to particular Sections of the draft Conventions document, are indicated by their section number followed by the question number (with hyphen). For example Q5.2-1 is question 1 for Section 5.2 of the Conventions.

This Volume may be used as an electronic form into which responses are entered directly, if required. See “Completing the electronic format document”, below.

Upon successful completion of the consultation exercise, the updated conventions (Volume 2) will be amended in line with comments received and will then be re-issued as the formal Irish National Numbering Conventions.

It should be noted that responses to this consultation document incur no obligations or commitments on the part of the respondent and are accepted as being for the purposes of the consultation only.

How to respond

We would welcome your response to this consultative document. Please study the relevant parts of the main text and the questions posed there and send your comments by **30th April 1999**, to:

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This document is available in Word97 format and applicants are recommended to obtain a copy, either from the above address or directly from the ODTR's web site. Responses may be entered directly into the document, which is designed as a form, with check boxes and text fields (see below). Alternatively, responses may be provided in free-text written format.

Note: conversion of the document into a format other than Word97 may result in changes to heading numbers and other numbers, as well as to layout, so is not recommended.

All comments are welcome, but it will make our task of analysing responses easier if comments reference relevant question numbers from this document. The ODTR will make copies of the comments available for public inspection at its offices. The Director regrets that it will not be possible to enter into correspondence with all those supplying documents.

Following analysis of the comments a Decision Notice will be issued by early June 1999, setting out the findings of the consultation process and announcing release of the first formal version of the Irish National Numbering Conventions.

Completing the electronic format document

To select a check box or text field entry either use the mouse to select it or else press the Tab key repeatedly to move forward one box/field at a time. Pressing Shift+Tab moves back one entry at a time.

Press the space bar to enter an X, in a check box.. *Note: This can be erased by again pressing the spacebar, if required.*

To enter Text in a text field, first select the present text and delete it (or simply overtype it) - then continue typing, as required. There is no limit to the amount of text that can be entered.

Note: This consultation document is not a legal document nor does it 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 to her rights and duties under the relevant legislation.

1. Scope of the Conventions

The scope of the conventions is critically important. It has been deliberately restricted to telephone numbering at this time but in due course it may be extended so that other areas, such as Data, Broadband and/or Internet / IP numbering may be included.

Questions

Q1-1 Do you agree with the general description of the Conventions' scope in the draft Conventions document?

Yes No

(Please add comment here, if any)

Q1-2 Do you agree that the scope should be restricted to telephony, at least initially?

Yes No

(Please add comment here, if any)

Q1-3 Do you have any other comments on Section 1 of the Conventions?

Yes No

(Please add comment here, if any)

2. Definition Of Terms

This section has deliberately been minimised; however comments concerning important omissions, if any, are invited.

Questions

Q2-1 Do you feel that the present minimal set of terms is sufficient?

Yes No

If not please identify here those new terms you feel should be added

Q2-2 Do you agree with the existing definitions?

Yes No

(Please add comment here, if any)

3. Responsibilities

This section of the Conventions strives to balance the responsibilities of the various parties involved in numbering for ensuring its future management operates effectively. It also identifies factors which need to be taken into account.

3.1 Responsibilities of the Director

This section is intended to define the broad framework within which the ODTR should manage the National Numbering Scheme.

The reference to support for number portability is subject to the outcome of the public consultation on that subject.

Convention 3.1-8 speaks of “consulting with market parties on important numbering convention issues and on large-scale withdrawals of allocated numbers”. It should be noted that the present intention of the ODTR is to identify a panel of representatives from various sectors of the telecommunications industry and public to achieve that aim efficiently.

Questions

Q3.1-1 Do you agree with the ODTR’s plans for consultation on important numbering convention issues and on large-scale withdrawals of allocated numbers?
Yes **No**

(Please add comment here, if any)

Q3.1-2 Do you feel the ODTR’s responsibilities are adequately defined in this sub-section?
Yes **No**

(Please add comment here, if any)

Q3.1-3 Have any important issues been missed from this sub-section?
No **Yes**

(Please add comment here, if any)

3.2 Operators Responsibilities

This section is intended to define the framework within which individual operators should manage their involvement with the National Numbering Scheme. It indirectly influences certain ways in which end-users are affected, where such control is more effectively managed through the operators than directly by the ODTR.

Questions

Q3.2-1 Do you agree with the requirements to open access (i.e. to all ITU-listed country codes and to all Irish allocated numbers) (Conventions 3.2-2 to 3.2-4)?
Yes **No**

(Please add comment here, if any)

Q3.2-2 Do you agree with the publication requirements (Convention 3.2-5)?
Yes **No**

(Please add comment here, if any)

Q3.2-3 Do you agree with the requirements for parallel running and recorded announcements during number changes (Convention 3.2-6)?
Yes **No**

(Please add comment here, if any)

Q3.2-4 Do you disagree with any of the other Conventions in this sub-section?
No **Yes**

(Please add comment here, if any)

Q3.2-5 Have any important issues been missed from this sub-section?
No **Yes**

(Please add comment here, if any)

Q3.2-6 Do you have any other comments on any part of Section 3 of the Conventions?
 Yes No

(Please add comment here, if any)

4. Allocation of Numbers

4.1 The application process

The individual requirements for showing eligibility to receive numbers are more susceptible to disagreement than is the actual principle of establishing eligibility; therefore these details are relegated to Annex 1 – which will be considered later herein.

Secondary allocation of numbers occurs at an operational distance from the ODTR but is of importance as it impacts the end-user directly.

Questions

Q4.1.1-1 Do you agree with the broad thrust of the eligibility requirements (primary and/or secondary)?
 Note: detailed comments on individual requirements should be reserved for the section dealing with Annex 1.
 Yes No

(Please add comment here, if any)

Q4.1.1-2 Do you agree with use of the principle of 'first come, first served'?
 Yes No

(Please add comment here, if any)

Q4.1.1-3 Do you agree that applicants should be allowed to indicate their preferences for numbers or codes but that the NPM shall have the final say?
 Yes No

(Please add comment here, if any)

Q4.1.2-1 Do you agree that secondary allocation of numbers should also be subject to the National Conventions?
 Yes No

(Please add comment here, if any)

Q4.1.2-2 Do you agree with the present Conventions for secondary allocation in Section 4.1.2?
 Yes No

(Please add comment here, if any)

4.2 Information required when making an application

There are no specific questions for this sub-section. The detailed data requested from applicants will be considered in Annex 3.

4.3 Refusal of primary or secondary allocation

Refusal to allocate numbers or codes can have serious implications for the applicant and therefore such a decision is not to be taken lightly. On the other hand, numbers and codes are in limited supply and must not be wasted. A solution for some cases is to attach conditions to the allocation, but it must be clear that authority exists to apply such conditions. Finally, in all cases where refusal or modification of request occurs, the applicant, whether at primary or secondary level, must have the facility to appeal this decision.

Q4.3-1 Do you agree that operators and service providers, as applicable, should have the right to directly refuse to allocate numbers (whether subscriber numbers or numbers following service codes) or to set conditions for such (secondary) allocation?

Yes No

(Please add comment here, if any)

Or

Q4.3-2 Do you believe that instead of this, all refusals or modifications should be done through the ODTR?

Yes No

(Please add comment here, if any)

Q4.3-3 Do you agree with the applicant's first level redress procedure described in Convention 4.3-4(ii) and 4.3-4(iii)?

Yes No

(Please add comment here, if any)

4.4 Confidentiality

Q4.5-1 Do you have you any comments on the proposed Conventions covering confidentiality?

Yes No

(Please add comment here, if any)

4.5 Timescales for applications

Q4.6-1 Do you agree that the timescales of this section are reasonable?

Yes No

(Please add comment here, if any)

Q4.6-2 Are the exceptions to normal timescales acceptable and sufficient in your view?

Yes No

(Please add comment here, if any)

Q4-1 Do you have any other comments on any part of Section 4 of the Conventions?

Yes No

(Please add comment here, if any)

4.6 Appeals

Q4.4-1 Do you agree with the applicant's appeal procedure described in Convention 4.4?

Yes No

(Please add comment here, if any)

5. Reservation of numbers

Reservation of numbers is a special case, which is only allowed in some countries. The ODTR believes it is a tool which provides some additional flexibility for operators and users and therefore proposes to include it as an option, where justified.

5.1 Primary Reservation by Operators

Q5.1-1 Do you agree with the principal that operators should be allowed to reserve blocks of numbers or (individual) codes?

Yes No

(Please add comment here, if any)

Q5.1-2 Do you agree with the stated conditions under which they may be reserved?

Yes No

(Please add comment here, if any)

Q5.1-3 Do you agree that possession of a reservation should not **entitle** operators to activate the capacity and that the applicant should still have to fulfil the normal allocation criteria before activation is allowed?

Yes No

(Please add comment here, if any)

Q5.1-4 Do you agree with the cancellation and change conditions attached to reservation in this section, including the time related conditions?

Yes No

(Please add comment here, if any)

5.2 Reservation by end users

Q5.2-1 Do you agree with the principal that end users should be allowed to reserve individual numbers or codes?

Yes No

(Please add comment here, if any)

Q5.2-2 Do you agree with the stated conditions under which they may be reserved?

Yes No

(Please add comment here, if any)

Q5.2-3 Do you agree that possession of a reservation by an end user should not **entitle** operators to activate the capacity and that the applicant should still have to fulfil

the normal allocation criteria before activation is allowed?

Yes No

(Please add comment here, if any)

Q5.2-4 Do you agree with the cancellation and change conditions attached to reservation in this section, including the time related conditions?

Yes No

(Please add comment here, if any)

Q5-1 Do you have any other comments on any part of Section 5 of the Conventions?

Yes No

(Please add comment here, if any)

6. Allocation of short codes

The decision when to allocate short codes, instead of ordinary subscriber numbers is not always an easy one but there is sometimes a need to resort to their use.

Q6-1 Do you agree with the criteria for deciding on allocation of short codes, as described in this Section?

Yes No

(Please add comment here, if any)

Q6-2 Have any important criteria been missed out?

Yes No

(Please add comment here, if any)

Q6-3 Do you have any other comments on Section 6 of the Conventions?

Yes No

(Please add comment here, if any)

7. Responsibilities for notification of number activation

Q7-1 Do you agree with the statements concerning notification of activation, in this Section?

Yes No

(Please add comment here, if any)

Q7-2 Should anything else be added?

Yes No

(Please add comment here, if any)

Q7-3 Do you have any other comments on Section 7 of the Conventions?

Yes No

(Please add comment here, if any)

8. Right to use numbers, number blocks and codes

What does it mean to be allocated or allowed to reserve number blocks or numbers (including codes)? This section is based on the premise that they belong to the State but are made available for public use under limited constraining conditions.

Q8.1-1 Do you agree with the common good statements and usage conditions of Section 8.1?

Yes No

(Please add comment here, if any)

Q8.2-1 Do you agree with the common good statements and usage conditions of Section 8.2?

Yes No

(Please add comment here, if any)

Q8.2-1 Do you agree with the user rights stated in Convention 8.2-4, 8.2-5 and 8.2-6?

Yes No

(Please add comment here, if any)

Q8-2 Should anything else be added to either Section 8.1 or Section 8.2?

Yes No

(Please add comment here, if any)

Q8-3 Do you have any other comments on Section 8 of the Conventions?

Yes No

9. Audit information required from service providers

Clearly the ODTR can only carry out its work with the co-operation of the other telecommunications parties. Up-to-date numbering information, in particular, is of importance to all concerned and there is a difficult line to be drawn between burdening operators with undue requests for data on the one hand and forcing them to work with out-of-date data on the other hand.

And apart from the information which is collated and published, it is also important for the ODTR's oversight role that it should have accurate facts and figures on networks' status.

Q9-1 Do you agree that the information requested in Section 9 is reasonable?

Yes No

(Please add comment here, if any)

Q9-2 Do you have any other comments on Section 9 of the Conventions?

Yes No

(Please add comment here, if any)

There are no specific questions for this sub-section.

11. Conditions of use for numbers and short codes

11.1 General conditions

This section of the conventions is intended to address the general conditions of use for numbers and short codes.

Q11.1-1 Do you agree with the record retention requirements of Section 11.1?

Yes No

(Please add comment here, if any)

Q11.1-2 Do you agree with the bar on number trading and with the conditions applied to number transfer?

Yes No

(Please add comment here, if any)

Q11.1-3 Do you agree with the tariff-related statements in this section?

Yes No

(Please add comment here, if any)

Q11.1-4 Do you agree that it is appropriate (at least initially) for the ODTR to retain its right to apply additional conditions of use, if necessary?

Yes No

(Please add comment here, if any)

11.2 Subscriber numbers usage

Q11.2.1-1 Do you agree with the usage conditions for Primary (and secondary) allocation?

Yes No

(Please add comment here, if any)

Q11.2.3-1 Do you agree with the usage conditions for bursty numbers?

Yes No

(Please add comment here, if any)

Q11.2.3-2 Do you have particular views on sanctions to be taken against bursty traffic offenders?

Yes No

(Please add comment here, if any)

11.3 Conditions of use for specific number types

11.3.1 Short Code Usage.

Q11.3.1-1 Do you agree with the Convention for Short Code Usage?

Yes No

(Please add comment here, if any)

11.3.2 Freephone usage

Q11.3.2-1 Do you agree with the Convention on codes for Freephone (1800) services?
 Yes No

(Please add comment here, if any)

11.3.3 Shared Cost Numbers usage

Q11.3.3-1 Do you agree with the Conventions on codes for Shared Cost (1850 & 1890) services?
 Yes No

(Please add comment here, if any)

11.3.4 Universal Access Number usage

Q11.3.4-1 Do you agree with the Convention on codes for Universal Access (0818) services?
 Yes No

(Please add comment here, if any)

11.3.5 Personal Number usage

Q11.3.5-1 Do you agree with the Convention on codes for Personal Numbering (0700) Services?
 Yes No

(Please add comment here, if any)

11.3.6 Directory Information Access Codes usage

Q11.3.6-2 Do you agree with the Convention on Directory Services access code 118?
 Yes No

(Please add comment here, if any)

11.3.7 Network Unique Short Codes (NUSC's)

Q11.3.7-1 Do you agree with the general Conventions on NUSCs in Section 11.3.7?
 Yes No

(Please add comment here, if any)

11.4 Use of Premium Rate Numbers

Q11.4-1 Do you agree that only licensed Network Operators or Service Providers which hold current agreements with Regtel should be candidates for receipt of Premium Rate numbers?
 Yes No

(Please add comment here, if any)

Q11.4-2 Do you agree with the other Conventions on codes for Premium Rate Services in Section 11.4?

Yes No

(Please add comment here, if any)

11.5 Geographic number usage - Definition of areas

Q11.5-1 Do you agree with the Conventions relating to geographic areas in Section 11.5?

Yes No

(Please add comment here, if any)

11.6 Portability of numbers

Questions on this sub-section will be developed after the (analysed) consultation results are available.

11.7 Withdrawal, quarantine and change of numbers

Withdrawal, quarantine or changes of numbers are all very serious steps, which often impact the holder(s) of those numbers. Therefore a balance has to be drawn between the holder's rights and costs and other interests (e.g. management of the numbering resource).

As detailed reasons for withdrawal are listed in annex 4, comments at this point should only refer to sub-sections 11.7.1-11.7.3.

Q11.7.1-1 Do you agree with the Conventions relating to primary and secondary number withdrawal, in Sections 11.7.1 and 11.7.2?

Yes No

(Please add comment here, if any)

Q11.7.3-1 Do you agree with the Conventions relating to quarantine of numbers, in Section 11.7.3?

Yes No

(Please add comment here, if any)

Q11-1 Do you have any other comments on Section 11 of the Conventions?

Yes No

(Please add comment here, if any)

12. Use of Numbers and alpha-numeric Characters

This section of the Conventions is advisory only and aims at encouraging a common national approach to keypads, alphanumeric relationships and number presentation. There is no mandatory text. Nevertheless questions are included below so that respondents may have the opportunity to comment if they wish¹.

¹ The inclusion of this section in the Numbering Conventions was foreshadowed in the Numbering Consultation of March 1998.

Q12.1-1 Do you agree with the Conventions on standards for alphanumeric keypads?

Yes No

(Please add comment here, if any)

Q12.2-1 Do you agree with the Conventions on presentation of numbers?

Yes No

(Please add comment here, if any)

Q12-1 Do you have any other comments on Section 12 of the Conventions?

Yes No

(Please add comment here, if any)

13. Mandatory dialling procedures

Q13.1-1 Do you agree that Operators should be required to engineer their systems to accept local calls made using national dialling (i.e. prefixed by 0 and the local NDC²), or local dialling (i.e. using only the subscriber number)?

Q13.2.1 Do you agree with the Conventions relating to calls to Northern Ireland, including the tariff aspects?

Q13-1 Should anything else be added to this either Section 13.1 or Section 13.2?

Yes No

(Please add comment here, if any)

Q13-2 Do you have any other comments on Section 13 of the Conventions?

Yes No

(Please add comment here, if any)

² National Destination Code (See Annex 5 for explanation)

14. Publication of dialling and numbering scheme Usage

Q14-1 Do you have any comments on Section 14 of the Conventions?

Yes No

(Please add comment here, if any)

15. Revision of the National Numbering Conventions

The ODTR believes that having principles for review in place from the outset is an important requirement for the Numbering Conventions. Therefore this section provides a mechanism to ensure the ongoing usefulness of the document. As the rules set down in the Conventions are mostly based on existing practice a smooth transition is expected and very frequent reviews should not be necessary.

Q15-1 Do you feel that this Section on revision adequately addresses the correct issues?

Yes No

(Please add comment here, if any)

Q15-2 Do you agree with the proposed timescales?

Yes No

(Please add comment here, if any)

Q15-3 Do you agree that description of the option for operators, users and others to make submissions on new or amended Conventions at any time is satisfactory, when taken in conjunction with the issues to which the ODTR shall have regard?

Yes No

(Please add comment here, if any)

Q15-4 Should anything else be added to this Section?

Yes No

(Please add comment here, if any)

Q15-5 Do you have any other comments on Section 15 of the Conventions?

Yes No

(Please add comment here, if any)

Annex 1: Eligibility Criteria for Applicants

A1.1 Geographic Numbering Criteria

Q.A1.1-1 Do you agree that the criteria set for eligibility to apply for geographic numbers are reasonable and satisfactory?

Yes No

(Please add comment here, if any)

Q.A1.1-2 *Should anything else be added to this Annex 1 Section?*

Yes No

(Please add comment here, if any)

A1.2 Non-Geographic Numbering Criteria

Q.A1.2-1 *Do you agree that the criteria set for eligibility to apply for non-geographic numbers are reasonable and satisfactory?*

Yes No

(Please add comment here, if any)

Q.A1.2-2 *Should anything else be added to this Annex 1 Section?*

Yes No

(Please add comment here, if any)

A1.3 Carrier Access / Carrier Selection Code Criteria

Q.A1.3-3 *Do you agree that the criteria set for eligibility to apply for Carrier Access/Carrier Selection codes are reasonable and satisfactory?*

Yes No

(Please add comment here, if any)

Q.A1.3-4 *Should anything else be added to this Annex 1 Section?*

Yes No

(Please add comment here, if any)

A1.4 Directory Information Access Code Criteria

Q.A1.4-1 *Do you agree that the criteria set for eligibility to apply for Directory Information Access codes are reasonable and satisfactory?*

Yes No

(Please add comment here, if any)

Q.A1.4-2 *Should anything else be added to this Annex 1 Section?*

Yes No

(Please add comment here, if any)

A1.5 Internet Access Number Criteria

Q.A1.5-1 *Do you agree that the criteria set for eligibility to apply for Internet Access codes are reasonable and satisfactory?*

Yes No

(Please add comment here, if any)

Q.A1.5-2 *Should anything else be added to this Annex 1 Section?*

Yes No

(Please add comment here, if any)

Annex 2: Grounds for rejecting an application

A2.1 Refusal of Primary Allocation / Reservation

Q.A2.1-1 Do you agree that the grounds for rejection of primary allocation or reservation are reasonable and satisfactory?

Yes No

(Please add comment here, if any)

Q.A2.1-2 Should anything else be added to this Annex 2 Section?

Yes No

(Please add comment here, if any)

A2.2 Refusal of Secondary Allocation / Reservation

Q.A2.2-1 Do you agree that the grounds for rejection of secondary allocation or reservation are reasonable and satisfactory?

Yes No

(Please add comment here, if any)

Q.A2.2-2 Should anything else be added to this Annex 2 Section?

Yes No

(Please add comment here, if any)

Q.A2-1 Do you have any other comments on Annex Section A2 of the Conventions?

Yes No

(Please add comment here, if any)

Annex 3: Information required from Applicants for Primary Allocations

Q.A3-1 Do you agree that the information required from applicants and the format are reasonable and satisfactory?

Yes No

(Please add comment here, if any)

Q.A3-2 Should anything else be added to Annex 3?

Yes No

(Please add comment here, if any)

Q.A3-3 Do you have any other comments on Annex Section A3 of the Conventions?

Yes No

(Please add comment here, if any)

Annex 4: Grounds for withdrawal of Numbers

A4.1 Withdrawing primary level allocations /reservations

Q.A4.1-1 Do you agree that the grounds for withdrawal of primary allocation or reservation are reasonable and satisfactory?
 Yes No

(Please add comment here, if any)

Q.A4.1-2 Are the 'considerations to be addressed before primary withdrawal' satisfactory?
 Yes No

(Please add comment here, if any)

Q.A4.1-3 Should anything else be added to this Annex 4 Section?
 Yes No

(Please add comment here, if any)

A4.2 Withdrawing secondary level allocations/reservations

Q.A4.2-3 Do you agree that the grounds for withdrawal of secondary allocation or reservation are reasonable and satisfactory?
 Yes No

(Please add comment here, if any)

Q.A4.2-4 Are the 'considerations to be addressed before secondary withdrawal' satisfactory?
 Yes No

(Please add comment here, if any)

Q.A4.2-5 Should anything else be added to this Annex 2 Section?
 Yes No

(Please add comment here, if any)

Q.A4-1 Do you have any other comments on Annex Section A4 of the Conventions?
 Yes No

(Please add comment here, if any)

Annex 5: Existing numbering arrangements³

Q.A5-1 Do you have any comments on Annex Section A5 of the Conventions?
 Yes No

(Please add comment here, if any)

³ From ODTR 98/09; Numbering in Ireland: Proposals for the 21st Century (A consultative Document).