



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Management and Maintenance of the National Directory Database

Submissions to Consultation 18/91

Submissions to Consultation

Reference: ComReg 18/108s

Version: Final

Date: 06/12/2018

Document No:	18/108s
Date:	06 December 2018

Consultation:	18/91
Response to Consultation:	18/108

Content

Section	Page
1: BT Ireland.....	4
2: Eir	7
3: Imagine.....	12
4: PortingXS	16

1: BT Ireland

BT Communication Ireland Ltd ["BT"] Response to
ComReg Consultation

Management and Maintenance of the National Directory Database

1.0 Introduction

We welcome that the National Directory Database (NDD) is being reviewed with the potential for modernisation. The work of the industry with PortingXS on number porting has been very successful and a similar experience with the NDD will be good for both the industry and the end customer. There are a small number of areas where we would like to see key improvements with the solution which are addressed in Section 2 of our response. We also address our response to the ComReg questions in Section 3.

2.0 BT Specific Functional Request.

There are three functional requests for improvements to the current NDD solution that we request.

- 2.1 The ability to review and download our entries on the NDD. The current system does not easily permit a review of our data on the system hence we now have our own mirror system of our entries on the NDD. From time to time we would like to be able to ensure our system is in sync with the NDD.
- 2.2 We welcome the proposal to have an alternative to marketing information CDs that are currently distributed and which we then have to manually load into our systems. We certainly prefer an automated download facility that is as near real time as possible.
- 2.3 Before the system is built and or configured for Ireland we would like to participate in an industry group to discuss the process for updating the PXS system to understand any changes we will need to make to our automated systems. A strong learning we have taken from updating the Central Ported Number Database is we need to be crystal clear as to how the protocols and timers work to avoid unintended consequences.

3.0 Response to the ComReg Questions

- 3.1 R1. BT agrees there is a need for the NDD for: directory, X-directory and opt-out of cold calling information.
- 3.2 R2. We agree there is a need to mandate an operator to provide the NDD and welcome that a volunteer has come forward.
- 3.3 R3. We welcome that a volunteer has come forward and clearly given the nature of the task it should be regulated appropriately.
- 3.4 R4. We agree that it is possible to minimise the impact of the change-over, however we know from years of experience dealing with the automated

interworking of operators that discussions between the actual operators will be required to achieve the correct software configuration, timers etc.

Without such ComReg should expect problems. Number porting and years of making products interwork automatically has proven we can do this.

- 3.5 R5. We agree that 3 to 5 years is the most appropriate time period for this direction, however the direction should also allow for a performance review at the end of each year, and deal with events such as PXS potentially being taken over by another company.
- 3.6 R6. We agree that Eir should only be paid for the period which they have provided service. However, ComReg should give Eir fair and reasonable notice of the end of their service and a short period of overlap testing should be built into the changeover.
- 3.7 R7. We agree.
- 3.8 R8. We agree with the draft Decision instrument; however we would like to add one other item if not yet included.
1. The NDD provider shall not sell or make available the contents of the NDD other than the marketing download to any third part except for ComReg or other competent authorities in Ireland.

End

2: Eir

Eircom Group

Response to ComReg Document 18/91

Management and Maintenance of the National Directory Database



12 November 2018



eir response to ComReg 18/91

DOCUMENT CONTROL

Document name	Eircom Group response to ComReg Consultation Paper 18/91
Document Owner	Eircom Group
Status	Non-Confidential

The comments submitted in response to this consultation are those of Eircom Limited and Meteor Mobile Communications Limited, collectively referred to as 'eir'.



INTRODUCTION

eir welcomes the opportunity to respond to this further consultation.

RESPONSES

Q.1 Do you agree there is a need for a NDD?

This question is otiose in the context of the purpose of the consultation which is to consider whether Porting XS should be designated to manage and maintain the NDD.

Q.2 Do you agree that ComReg should require an undertaking pursuant to Regulation 19 and 30 of the Regulations, to manage and maintain the NDD after March 2019?

ComReg proposes a 3 month transition period for Porting XS to assume responsibility for the management of the NDD. Whilst we welcome the clarification in ComReg 18/93 that PortingXS will support the current interface specifications, we believe that 3 months may not be sufficient for a migration period as a number of operators and DQ providers will need to schedule the necessary integration activity into already busy IT schedules. We believe it would be more appropriate for a 6 month transition period to be catered for. The 6 month period should commence in the new year, after the change freeze period that is generally maintained by operators over the Christmas period.

Please note that if PortingXS was not able to support the current interface specifications the transition period would need to be much longer than 6 months.

Q.3 Do you agree that PortingXS as the sole undertaking who expressed an interest in managing and maintaining the NDD should be required, pursuant to Regulations 19 and 30 to do so?

Yes.

Q.4 Do you agree with ComReg's preliminary view that a change in the undertaking required to manage and maintain the NDD would have a minimal impact on stakeholders?

We agree that an orderly transition can be achieved with relatively limited impact on stakeholder resources in light of the clarification in ComReg 18/93 that PortingXS will be able to support the current interface specifications.

Q.5 In your view is 3-5 years the most appropriate time period for this direction?

We believe it would be appropriate to set a 5 year period for the direction from when the transition is complete. Taking into account a 6 month transition period, this would mean that the direction would run to 30th June 2024. We believe it would be appropriate for ComReg to undertake a review of the effectiveness of the PortingXS solution after the first full year of operation.



Q.6 Do you agree that in the event PortingXS is directed to manage and maintain the NDD that eir should reimburse licensees if fees have been paid for access to the information for periods beyond the go live date?

eir agrees that fees collected in advance will be reimbursed pro rata relative to the services consumed to date.

Q.7 Do you agree with ComReg's draft assessment of the impact of the proposed options?

Paragraph 107 is incorrect – eir is not currently required to provide a printed directory – and therefore is not relevant to the RIA.

Paragraph 117 states “*ComReg has to be mindful of the legislative anomaly*”. This is not a relevant consideration for the RIA. In any event the Privacy Regulations have been incorrectly transposed and this is widely acknowledged. ComReg should not rely upon flawed legislation to make a flawed decision.

Q.8 Do you agree with the terms of ComReg's draft Decision Instrument?

The transition period is defined as starting in November 2018. As noted above operators generally maintain IT change freezes over the Christmas period. Therefore the transition period should not commence until January 2019.

Clause 3.2 of the draft decision states the Operational Specification shall be agreed with ComReg. We believe that operators / users of the NDD should be afforded an opportunity to comment on the Operational Specification.

The term Service Level Agreements in clause 3.3 of the draft decision should be defined.

3: Imagine

ComReg

Retail Division,
Commission for Communication Regulation
One Dockland Central,
Guild St., North Dock
Dublin 1
D01 E4XO

15th November 2018

**Submission to ComReg 18/91
Management and Maintenance of the National Directory Database**

Dear ComReg,

Please find undernoted Imagine Communications response to the consultation document 18/91 as dated the 15/10/2018.

If you have any additional queries in relation to the response, please contact me for further information.

Best Regards,

Eoin

Annex 2

Consultation Questions:

1. ***Do you agree that there is a need for a NDD?***

Response

Yes we believe there is a requirement for a NDD as per the reasons outlined by ComReg within this consultation document.

2. ***Do you agree that ComReg should require an undertaking pursuant to Regulation 19 and 30 of the Regulations, to manage and maintain the NDD after March 2019? Please provide detailed reasons and supporting evidence for your view***

Response:

Yes, in order to ensure this existing functions continue.

3. ***Do you agree that PortingXS as the sole undertaking who expressed an interest in the managing and maintaining of the NDD should be required, pursuant to Regulations 19 and 30 of the Regulations, to do so? Please provide detailed reasons and supporting evidence for your view.***

Response:

Yes, in Imagine's opinion PortingXS should manage and maintain the NDD for the following reasons:

- Based on the supplied consultation document PortingXS would be a cheaper option than the current pricing
- PortingXS through the FNP process and along with industry have introduced an improved and efficient replacement to the legacy porting process and as such, it would be Imagine's hope that the current NDD process could evolve with PortingXS to make it more efficient than the current process.

4. ***Do you agree with ComReg's preliminary view that a change in the undertaking required to manage and maintain the NDD would have minimal impact on stakeholders? Please provide detailed reasons and supporting evidence for your view.***

Response:

Yes. If as outlined in the consultation document the intent is for PortingXS to keep the same process in place, then this should minimize the impact to stakeholders. However Imagine would like to point out that the current process is inefficient and could be improved in order to make updates more real-time. We would be eager to explore what options may be available to move not only the updating of Data but also the Direct Marketing "opt out" element of the NDD to a real time api based solution.

- 5. In your view is 3-5 years the most appropriate time period for this direction? Please provide detailed reasons and supporting evidence for your view.**

Response:

Yes. In Imagine's opinion 3 years would be a sufficient time period to award the contract for. As stated in the document this allows for reduced costs over the longer period. It would be Imagine's view that the contract should not be greater than a 3 year period as this will allow for the contract to be reviewed and retendered which would accommodate changes in technology and potentially improvements in processes.

- 6. Do you agree that in the event PortingXS is directed to manage and maintain the NDD that Eir should reimburse licenses if fees have been paid for access to the information for periods beyond the go live date? Please provide detailed reasons and supporting evidence for your view.**

Response:

Yes. In Imagine's opinion Eir should only be paid for the service up until the point that they are providing the service. Once the service goes live on PortingXS then any fees paid in advance to Eir should be reimbursed. This would ensure all stakeholders and not paying twice for a service and are not discriminated against based on their subscriber's licence renewal date.

- 7. Do you agree with ComReg's draft assessment of the impact of the proposed options? Please provide detailed reasons and supporting evidence for your view.**

Response:

Yes. Imagine agrees with ComReg's assessment as per the reasons outlined by ComReg in the document.

- 8. Do you agree with the terms of ComReg's Draft decision Instrument? Please provide detailed reasons and supporting evidence for your view.**

Response:

Yes.

4: PortingXS



Porting Access bv

Schenkkade 50
2595 AR Den Haag
The Netherlands

+31 (0)70 219 99 99
www.portingxs.com

ComReg –
Commission for Communications Regulation
Attn:
retailconsult@comreg.ie

Subject: Motivational letter for License awarding to PortingXS for the Management and Maintenance of the NDD

The Hague, 08 November 2018

Dear reader,

I hereby confirm that our previous interest in managing and maintaining the NDD for Ireland remains unchanged.

As we have implemented Directory Information Services for many customers, and in different countries languages and processes, we have strong **project management** and **implementation** capabilities. Our team has assisted regulators as well as operators in various countries, and jointly represent the best knowledge and experience that is available in the field.

The Directory Information Services from PortingXS and the Robinson List platform makes it possible for consumers and enterprises to update and manage their telephone number(s) related to the addressee's public information as well as the Opt-Out register.

PortingXS is the appropriate choice to implement Directory Information Services, as this company is the perfect combination of **international experience** and **flexibility**. PortingXS has a solution for the central reference database, the End-users solution and the operator integration which is:

1. **Future proof**; the solution is state of the art for all stakeholders and made as simple as possible for managing Directory Services,
2. **Cost-effective**; it helps all parties to reduce their operational cost for managing Directory Services,
3. **Reliable**; the QoS and fault-rate (refused Subscriber details) are unparalleled,
4. **User-friendly**; the system has a personalised Graphical User Interface that can easily be adapted to local needs and requirements.

With regards to the questions raised in the consultation PortingXS states the following:

Q. 1 Do you agree that there is a need for a NDD?

- A. Even in a changing world with an increasing internet access PortingXS still sees the relevancy for a NDD solution. Consumers as well as businesses deserve the right to have a quality information published and protected with regards to their details. A Directory Service/ Telephone Guide still improve the access to information and the connecting of people and businesses.
- B. Consumer protection for unsolicited calls is safe guarded by the PortingXS solution. For businesses the solution increases the risk of making successful and useful calls towards the consumer. Business also cover the liability of unsolicited calls by using the Opt-Out register.
- C. A NDD solution covers the demand for getting in contact and how to get in contact with one another.

Q. 2 Do you agree that ComReg should require an undertaking pursuant to Regulation 19 and 30 of the Regulations, to manage and maintain the NDD after March 2019?

- A. PortingXS advices to have an undertaking to manage and maintain the NDD. Having a party managing and maintaining guarantees the quality of service and the correct distribution of information in a safely manner.

Q. 3 Do you agree that PortingXS as the sole undertaking who expressed an interest in managing and maintaining the NDD should be required, pursuant to Regulations 19 and 30 of the Regulations, to do so?

- A. From a PortingXS point of view we absolutely agree that PortingXS should be required as the sole undertaking to administer in managing and maintaining the NDD



Q. 4 Do you agree that Service Providers and licence holders will not be significantly impacted as a result of a change in the NDD manager from Eir to PortingXS?

A. From a PortingXS point of view we absolutely agree that we will migrate all parties with a minimal impact from Eir to PortingXS.

Q. 5 In your view is 3-5 years the most appropriate time period for this direction? Please provide detailed reasons and supporting evidence for your view.

A. We consider the most appropriate time period for this direction is 5 years. A period of 5 years will ensure a long-term solution with less impact for users and enable a long lasting qualitative system now and in the foreseeing future.

Q. 6 Do you agree that in the event PortingXS is directed to manage and maintain the NDD that Eir should reimburse licensees if fees have been paid for access to the information for periods beyond the go live date?

A. PortingXS would like to withhold itself from comments on this specific question.

Q. 7 Do you agree with ComReg's draft assessment of the impact of the proposed options?

A. PortingXS has read all requirements, specifications and worked dedicated on offering a great proposal to ComReg and the NDD users. With all the input that we have provided we can still find us in the draft assessment.

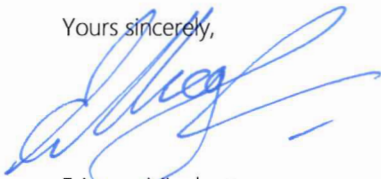
Q. 8 Do you agree with the terms of ComReg's draft Decision Instrument?

A. PortingXS agrees and feels pleasant with the terms mentioned in ComReg's draft Decision Instrument.

PortingXS is fully confident that with our years of experience in supplying Central Databases in the field of Telephony and related processes such as: Number Management, Number Portability, Directory Services and Telecom anti-fraud platforms the NDD solution will be Delivered, Management and Maintained by PortingXS to the full satisfactory of ComReg and its stakeholders.

We look forward to implementing the NDD service for Ireland.

Yours sincerely,



Eric van Mieghem
Porting Access BV
CEO