



Office of the Director of
**Telecommunications
Regulation**

Mobile Numbering and Mobile Number Portability in Ireland

Consultation Paper

Document No. ODTR 00/86

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Oifig an Stiúirthóra Rialála Teileachumarsáide
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1. Introduction

The numbering resources currently allocated to mobile services in Ireland are rapidly reaching exhaustion. Action is urgently required, but there are several ways to relieve this exhaustion. The choice of option is a complex one which requires consideration of number portability.

Mobile number portability had been raised in the context of number exhaustion relief in the consultation on the expansion of mobile numbering capacity earlier this year¹. It is also relevant in the context of 3rd Generation mobile services and was raised in the consultation on opening the market for 3G mobile services² in July.

In the report on the consultation on access in the mobile market³, the Director indicated that she considers that an early implementation of mobile number portability can provide considerable consumer benefit, given the likely competitive and economic benefits, the expected European legislative requirement⁴ and the additional numbering benefits particular to Ireland.

The ODTR invited interested parties to make further comments on the topic beyond the scope of the three consultations held to date. The Office indicated that the consultation responses would be collated and a further internal study on the matter would be conducted, before making a final decision on this issue. The study would include, inter alia, the limitations on the current mobile numbering space, the costs and benefits of mobile number portability, the alternative options and the implementation tasks that are required to bring mobile number portability into operation in Ireland.

The ODTR commissioned Ovum to carry out the study which: -

- provides a cost benefit analysis of the economic value of the current Subscriber Mobile Number Portability (SMNP) arrangement and of Full Mobile Number Portability (FMNP) and considers whether it is in Ireland's best economic interests to move as quickly as possible to FMNP
- develops options for dealing with the approaching exhaustion of mobile numbers and uses the cost benefit analysis in analysing those options.

The study report forms part of this consultation. However, the analysis, conclusions and proposals which it contains are Ovum's. Their publication does not imply any acceptance on the part of the ODTR.

¹ Expansion of Mobile Numbering Capacity, Consultation Paper, ODTR Document No. 00/20, March 2000 and Decision Notice D5/00, ODTR Document No. 00/28, April 2000

² Opening the Market for Third Generation Mobile Services (3G Mobile), Consultation Paper, ODTR Document No. 00/52, July 2000

³ The Regulatory Framework for Access in the Mobile Market, Report on the Consultation, ODTR Document No 00/53, July 2000

⁴ Directive on Universal Service and Users' Rights Relating to Electronic Communications Networks and Services, COM(2000) 392, July 2000

The Director now invites views from interested parties on the study findings and the questions which we pose in the next section of this document. Comments should be submitted in writing before 5pm on Friday 1st December 2000 to: -

Mr. Brian Deely,
The Office of the Director of Telecommunications Regulation,
Abbey Court,
Irish Life Centre,
Lower Abbey Street,
Dublin 1.

or by e-mail to: deelyb@odtr.ie

All comments are welcome, but it would make the task of analysing responses easier if comments reference the relevant question numbers from this document.

In order to promote further openness and transparency, the ODTR will make copies of the comments available for public inspection at its offices, excluding commercially sensitive information. Where material that is commercially sensitive is included in a response, this should be clearly marked as such and included in an Annex to the response.

Following the consultation, the Director will issue a Decision Notice on the main issues raised.

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

2. Consultation Questions

In answering the following questions, please refer to the report by Ovum entitled ‘Mobile Numbering and Number Portability in Ireland⁵’, published in parallel with this consultation paper. The report is available from the ODTR web site (www.odtr.ie) or by requesting a copy from Mr. Brian Deely, ODTR (Phone +353 1 804 9727, e-mail deelyb@odtr.ie).

Q1: Do you agree with Ovum’s conclusions (in Section 2.9 of its report) that:

- it is in Ireland’s best economic interests to move from SMNP to FMNP as soon as it is practicable?
- it is important that operators should be given enough time to implement a low cost, speedy and reliable porting process to support FMNP?
- it should be possible for the operators to implement FMNP by the beginning of 2003, and it might be possible to bring this date forward to mid 2002?

If not why not?

Q2: Can you suggest how the industry might improve on the implementation timescales set out in Section 2.8 of Ovum’s report?

Q3: Do you agree that Ovum’s projections of demand for mobile subscriptions and numbers set out in Figure 3.1 are reasonable?

Q4: Do the options for relieving mobile numbering exhaustion considered in Chapter 4 of Ovum’s report cover all reasonable approaches?

Q5: Which of the options considered in Chapter 4 offers the best solution with the lowest economic cost to Ireland as a whole? Why?

⁵ Mobile Numbering and Number Portability in Ireland, a Report to the ODTR by Ovum, October 2000, Ovum document ref. JCD50.