



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

National Directory Database (NDD)

Management and maintenance of the NDD

Submissions to Consultation 24/32

Reference: ComReg 24/56s

Version: Non-Confidential

Date: 28/06/2024

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1 Conduit Enterprises Ltd.

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By email to: RetailConsult@comreg.ie

Deadline: 5.00 pm on 4 June 2024



23rd May 2024

Submission to ComReg 24/32

Commission for Communications Regulation Retail Policy One Dockland Central,
1 Guild St.,
North Dock,
Dublin 1
D01 E4XO, Ireland

Dear Comreg

Re: Submission to ComReg 24/32 – NON CONFIDENTIAL

We write in relation to Comreg’s recent consultation “National Directory Database (NDD): Proposals to manage and maintain the NDD” with reference 24/32 dated 2nd May 2024.

In summary, we agree with Comreg’s preliminary view that the continuation of the NDD is critical. We also agree that an undertaking is required to manage and maintain the NDD, and we have no objections to that undertaking being PXS.

Please find Conduit’s answers below.

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

Yes, Conduit agrees that there is a need to continue with the NDD for the reasons outlined by Comreg, namely:

- regulatory requirements can not be fulfilled without the NDD.
- subscribers might lose some of their legal entitlements without the NDD.
- There will be a continued demand to access directory services information contained in the NDD over the coming years.

We would like to specifically address Comreg’s point regarding directory enquiries.

Conduit’s 11850 directory enquiries service has successfully operated in Ireland for more than two decades. It offers residential and business searches to customers requiring a phone number at any time of the day, seven days a week. Customers can access 11850 from their landline or mobile phone and Conduit is proud to assist customers with their phone number search whether it be a business listing or a residential request. Our aim has always been to help customers find the numbers they need quickly and easily so they don’t have to.

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Despite the continual development of smart phone technology over many years, and the wide availability of internet access in today's society, 11850 continues to retain a good foothold in the directory enquiries market and we expect this to continue. We still believe that there is an ongoing / future need for customers to have access to a directory enquiries voice service providing phone numbers which customers may not easily find on the internet or are required in a hurry.

Having the ability to offer residential phone numbers to callers of 11850 is an essential part of Conduit's service offering [3<]. Therefore, it is imperative that Conduit, and other directory enquiries providers, have access to a credible source of residential phone numbers in order to meet customer needs.

Removing the NDD would have a detrimental impact on both customers and directory enquiries service providers for the following reasons.

1. Customers will incur costs for calling a service which cannot offer them a residential search. This in turn creates an unacceptable customer experience that is likely to result in customers not calling directory enquiries services when in need of a future number.
2. Customer complaints and refunds will increase as customers require refunds for a service which can not be fulfilled.
3. Customers will struggle to locate an alternative credible source for finding this information.
4. The service offering of directory enquiries providers will be compromised as customers would need to be informed that residential numbers are no longer available. [3<]
5. Reduced calls from customers who no longer call for residential listings may accelerate the decline of the directory enquiries market.
6. As acknowledged within Comreg's RIA, directory enquiries providers would need to consider their retail pricing and service operations in the absence of residential listings. Any decisions arising from these reviews would negatively impact customers who would possibly need to pay a higher price for accessing directory enquiries or have a reduced service offering which does not meet their expectations.
7. To mitigate calls for residential phone numbers, directory enquiries providers may need to inform customers of the change in service offering. This will incur a cost that may have to be factored into business models.

It is for these reasons that Conduit is of the opinion that the NDD is essential, not only for 11850, but for all directory enquiries providers so that we can continue to provide to customers an all-inclusive service with easy access to a trustworthy source of residential phone numbers, in addition to other types of phone number listings.

2. Do you agree that ComReg should require a person pursuant to Regulation 95 of the EECC Regulations, to manage and maintain the NDD from 1 July 2024? Please provide detailed reasons and supporting evidence for your view.

Yes, Conduit agrees that Comreg should require a person pursuant to Regulation 95 of the EECC Regulations, to manage and maintain the NDD from 1 July 2024.

Having one undertaking authorised by Comreg to manage and maintain the NDD benefits both providers and consumers and ensures that the NDD is accessed and operated in line with regulatory obligations.

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For providers, it ensures that data remains consistent, relevant and up to date so directory enquiries services can continue to access and provide accurate residential phone numbers to customers.

For consumers, it provides comfort and protects them from unsolicited calls by centrally managing their details in a regulated database with preferences available to all providers.

- 3. Do you agree that PXS, as the sole person who expressed an interest in managing and maintaining the NDD, should be required, pursuant to Regulation 95 of the EEC Regulations, to do so? Please provide detailed reasons and supporting evidence**

Yes, based on the information provided by Comreg within this consultation, Conduit is of the opinion that PXS is the logical choice as the undertaking responsible for managing and maintaining the NDD.

Conduit has no further comment on this question.

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

Yes, based on the information provided by Comreg within this consultation, Conduit is of the opinion that a longer timescale of 3 – 5 years is the most appropriate time period for this direction to provide stability and certainty to users of the NDD.

Conduit has no further comment on this question.

- 5. 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.**

Yes, Conduit agrees with Comreg's draft assessment for the reasons laid out by Comreg in paragraphs 104 – 108 of section 4.5 "Assess the impacts and choose the best option".

Conduit has no further comment on this question.

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

Yes, Conduit agrees with the terms of Comreg's draft Decision Instrument. It is fair and the approach to the management and maintenance of the NDD is secure for the foreseeable future which is positive to both subscribers of the NDD and all its users.

Conduit has no further comment on this question.

I hope you will find the above information useful in your review.

Yours sincerely,



Emma Knight, Head of European DQ

2 Orange Business Telecommunications Limited

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[REDACTED]

[REDACTED]

[REDACTED]

Dear madam or sir

Please find hereafter Orange Business Telecommunications Services Limited's submission in respect of consultation 24/32.

Response to Q. 1: In respect of the market Orange Business addresses, which is the B2B market, we see more and more electronic service providers divesting national enquiry short-code numbers, at the same time end-users information searches is often conducted online by means of web browsers. Therefore, we are of the view that the need to operate a NDD for the purpose of directory enquiry services is not be a prerequisite in our target market.

Response to Q. 2: Yes, provided the outcome of the stakeholders' consultation confirms ComReg's assessment that there is a need to manage and maintain an NDD going forward.

Response to Q. 3: We agree that PXS be retained to manage and maintain the NDD based on this company's expertise in providing such service.

Response to Q. 4: Provided respondents are in favor to keep a NDD, and considering our answer to Q.1, Orange Business is of the view that the situation must be re-evaluated in 3 years-time to either review the service proposed, or the designated company.

Response to Q. 5 and Q.6: Yes.

Best regards



[REDACTED]

Orange Restricted

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