



Office of the Director of  
**Telecommunications  
Regulation**

## **Decision on National Numbering Conventions**

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### **Decision Notice D1/00**

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## 0. The Consultation Exercise

### 0.1 Format of the Consultation

In March 1999, a consultation paper on draft National Numbering Conventions was opened for comment. As the National Numbering Conventions consist of a large collection of individual conventions, the provided questionnaires and the responses were also much more detailed than is the usual case for ODTR consultations. Issues were addressed on a point-by-point basis, using For/Against tick boxes to indicate support or opposition. Text boxes were also provided to allow for free-form entries. Electronic forms were provided to facilitate responses.

Seven of the eight respondents who provided the most extensive inputs, chose to use the electronic format.

### 0.2 The Responses Received

#### 0.2.1 Summary of responses

The following responses were received to the consultation:

Responses addressing all or almost all of the Conventions	8
Responses addressing a selected limited sub-set of Conventions	1
Responses addressing single issues and/or special cases	3
'No comment' acknowledgements	1
<b>Total</b>	<b>13</b>

The summary of responses to individual questions is provided in Annex 6.

#### 0.2.2 The Submissions

The following organisations or individuals provided responses to the consultation paper:

Cable & Wireless	Network operator
Conduit Ireland	Service provider
Cuffley Communications	UK Consultant
Edward G. Rafferty	User
Esat Digifone	Mobile network operator
IDA Ireland	Irish industrial development agency
Irish Multichannel	Cable network operator
Michael A. McNamara	User
OCEAN	Network operator
Regtel	Regulator of Premium Rate Services
Telecom Eireann (now eircom)	Network operator
The Zockoll Group (UK)	Service provider
TVC	Service provider

### **0.3 Major themes in the Responses**

All questions raised during the consultation are addressed individually below. However, a number of issues were raised more prominently and/or occurred repetitively in the responses and these are discussed further in the following paragraphs.

#### **Management of the Numbering Plan**

Some responses to the consultation demonstrated a misunderstanding of the current regulatory position and suggested that certain decisions should be delegated to the NAP or should otherwise be performed in accordance with the wishes of particular industry sectors. For clarification, it should be noted that the Director has the sole right and obligation to manage the National Numbering Scheme.

In performing this function she takes account of the views of all interested parties, including the NAP, whose guidance in key matters is expected to be a very valuable resource. This is without prejudice to her rights and obligations to regulate the market generally.

#### **Direct Reservation or Allocation of Numbers by the Director**

There was a great deal of concern by some operators at the prospect of the Director either reserving or allocating numbers and codes for end-users, but no corresponding concern was expressed by non-operators. It should be noted that it is not the Director's position that she or her Office should undertake this function as a routine activity. However, she reserves her right to either reserve or allocate numbers or codes in special cases, should this become necessary to ensure proper operation of the marketplace.

The Director must also be free to step in to resolve intractable or unsatisfactory situations involving the provision or transfer of numbers to individual end users. The conditions under which this intervention might occur and the approaches needed to deal with them cannot be generically described in advance and any attempt to do so might have the effect of limiting the Director's necessary scope for action. She therefore has proposed no changes in any conventions in respect of such steps she might take.

#### **Reference to the Numbering Advisory Panel (NAP)**

The analyses of many responses have resulted in decisions to refer relevant issues to the NAP. In these cases the Conventions will be initiated without change in respect of the matter under consideration (unless indicated otherwise). They may then be subsequently amended if industry recommendations are provided by the NAP, and these are agreed by the Director.

#### **IP Naming and Addressing**

Several respondents have referred to a possible need to include Internet names and addresses in the National Numbering Conventions. The Draft Final Report of the European Telecommunications Office (ETO) on Harmonised National Conventions, dated September 1999 suggests that National Regulatory Bodies should monitor but not intervene in this area at present. Accordingly, the Director has decided not to include any Conventions covering this area for the moment, but she invites the NAP to study it and provide recommendations in due course.

#### **Mobile Numbering**

Only one mobile operator responded to the consultation, probably due to the non-inclusion of mobile numbering in the draft Conventions. That respondent was strongly in favour of inclusion of mobile numbering and advanced arguments in support of these objections – while nevertheless responding in detail to all questions. The Director recognises the importance, and indeed the rapidly growing importance, of mobile communications but wishes to see the first version of the National Numbering Conventions stabilised before extending them to include mobile numbering. Following that stabilisation, she intends that mobile numbering should be included as a priority.

### **Definition of Codes / Usage of Codes**

A number of comments were made that suggest a need for more clear definitions of the usage of codes (and in some cases numbers), including separate categorisation of network-specific codes from general usage codes. This is a matter that is appropriate for initial consideration by the NAP, working first of all on the basis of defining codes for which there is complete agreement and then adding steadily to that list over time. The Director will make her decisions, taking the NAP's recommendations into account.

### **Right to Issue Numbers**

Some operators repeatedly stated they are unclear about who has the right to issue telecommunications numbers and codes and they requested consultation with industry to clarify this. As stated above, this right resides solely with the Director, who allocates numbers (normally in blocks) and codes to network operators and certain service providers. These numbers and codes may then be further allocated individually and/or in sub-blocks, as appropriate, to end-users - or in specific cases to other service providers. The Director does not propose to intervene on a regular basis, but reserves the right to regulate this secondary allocation process directly at any stage should it become necessary for proper operation of the marketplace. This includes but is not limited to the direct allocation of numbers or codes to end users by the Director (see above). To provide the additional process clarity requested by some respondents in this consultation, the Director will ask the NAP to assist ODTR in more fully describing the process involved in number allocation/reservation.

### **Secondary Allocation, Reservation and Withdrawal**

Two operators felt that secondary allocation of numbers and codes should not be part of the conventions, either initially (operator one) or ever (operator two). This view also led to their disagreement with the inclusion of conventions covering secondary reservation of numbers and secondary level withdrawal of numbers. These operators felt that those activities should be self-regulated under the influence of market forces.

On the other hand, views expressed by service providers and by private respondents showed less trust in such reliance on commercial forces and in some cases sought stronger rules to protect them from the consequences of "commercial aspirations of network operators".

The Director agrees that it is inadequate for the scope of the National Numbering Conventions to be restricted to relationships between the ODTR and the network operators and she believes it is essential that the Conventions should ensure that end-users are adequately protected. She considers that the present Conventions covering secondary allocation, reservation and withdrawal are very limited and indeed these may need to be strengthened over time, with the assistance of the NAP.

## 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 Mobile, Data, Broadband and/or Internet / IP numbering may be included.

- There was majority support for the present text in respect of all the scope-related questions (see Annex 1).
- Furthermore, there was clear support for restricting the Conventions to telephony, but minority support was also expressed for inclusion of other numbers/codes over time. In addition, one (mobile) operator was dissatisfied that mobile numbering was excluded (see earlier).
- In addition to the basic responses, one (operator) respondent wished for the scope to be restricted to licenced operators only, whereas another (non-operator) respondent felt the conventions as written fail to leave solutions to market mechanisms.
- Some respondents sought a timescale for further enhancements to the Conventions.

### *The Director accepts these arguments and she has decided:*

- *The scope should be further developed over time e.g. the subsequent inclusion of mobile numbering can be considered once the Conventions are established and working for ordinary telephone numbering.*
- *To request the NAP to consider and advise when other numbers/codes should be included in the scope<sup>1</sup> (e.g. from among **DNIC, NSPC, ISPC, IIN, MNC, NSAP**). She believes that to set a rigid timescale at this stage for extension of the Conventions would not be wise, in the present rapid state of flux of telecommunications.*
- *That as the National Numbering Conventions affect all, including end-users, their scope should not be restricted to operators only.*

## 2. Definition Of Terms

The number of definitions provided was deliberately limited in order to avoid making the Conventions document too complex. However, comments were invited, especially concerning any important omissions.

- There were many responses that identified a need for more definitions to be provided.
- There were also disagreements with some of the provided definitions, as well as a feeling that there is ambiguity in some terms used in the Conventions. These especially concerned the terms “operator”, “Service Provider”, “NAP” and “bursty traffic”.
- One (operator) respondent wished for “secondary allocation/reservation” to be omitted whereas a non-operator conversely, wished for the terms “Subscriber/Customer” to be extended to allow for (secondary) allocation by non-operators.

### *The Director has considered these arguments and decided:*

- *To extend the list of definitions in section 2.*
- *To include these definitions in the first issue of the National Numbering Conventions.*
- *To ask the NAP to recommend improved definitions in any cases that might be the cause of serious disagreement (e.g. bursty traffic).*

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<sup>1</sup> It is a European Commission position, stated in COM (1999) 539: The 1999 Communications Review) to ‘require NRA supervision of allocation of point codes in signalling system No. 7 and access codes for corporate networks’.

### **3. Responsibilities**

This section of the Conventions strives to balance the responsibilities of the various parties involved in numbering to ensure its effective future management; it identifies factors of which account must be taken.

#### **3.1 Responsibilities of the Director**

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

- There was complete agreement with the ODTR's plans for consultation.
- There was consensus that the ODTR's responsibilities are adequately defined.
- Some respondents wished for the processes and mechanisms involved to be (pre-)defined and for the scenarios implied by "large-scale withdrawals" and "important numbering convention issues" to be identified.

*The Director is encouraged by this support. She considers that the wide range of conditions under which consultations might take place and the measure of what is a large-scale withdrawal cannot be defined in a generic fashion and must continue to be left to her judgement.*

#### **3.2 Operators Responsibilities**

This sub-section defines 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.

- There was broad agreement with the Conventions to open access to all ITU-listed country codes and to all Irish allocated numbers, but a number of observations or qualifications (sometimes contradictory) were added. Important comments were:
  - Access to the code 353 should be excluded
  - Convention 3.2-2 should be clarified to include country codes but exclude global services and networks – the latter should be subject to commercial decision.
- The response to Convention 3.2-5 (publication requirements) was strongly in favour, though with some negative observations that this is a terminal equipment issue rather than one of numbering. *[Note: There was some misunderstanding that the Convention lays down dialling requirements for equipment and might therefore be prescriptive in respect of publication, including how to handle dialling from behind a PABX].*
- There was majority support for the ODTR proposals for parallel running and recorded announcements, with significant comments also being made. However, Convention 3.2-6 as written, conflicts with none of these comments.
- One operator proposed a generic process that could be followed when number changes take place.
- In respect of Convention 3.2-1, two (operator) respondents felt it should be left to operators themselves to decide how to advise their customers of number changes.
- One respondent wished that operators should be required to publish details of tariff information associated with the leading digits of numbers.
- Another respondent noted that the section fails to define the responsibilities and rights of end users.

***With all the submitted comments in mind, the Director has decided:***

- *To add a note to Convention 3.2-1, stating that it is left to operators themselves to decide the most appropriate way to advise their customers of number changes affecting them.*
- *That Conventions 3.2-2 should be retained but it should be clarified that:*
  - a) access to the Ireland code 353 is excluded;*
  - b) Convention 3.2-2 applies to geographic country codes but not to global services and networks, as defined in Recommendation ITU-T E.164. The latter will be subject to commercial decision.*
- *That the NAP should be asked to study Convention 3.2-4 and (if necessary) recommend any changes which would place similar obligations on non-SMP operators as Convention 3.2-3 places on operators with SMP – perhaps with a delay of implementation, if appropriate.*
- *To clarify that Convention 3.2-5 is a recommendation to operators that they ensure their terminal equipment providers are aware that free dialling of 112 and 999 codes must be provided to callers (i.e. not a requirement for the operators to carry out a policing function).  
[Note: The Director also recognises that operators should be free to decide which literature is the most appropriate in which to publicise the advice.]*
- *That Convention 3.2-6 should be retained basically unchanged, but with a footnote added to clarify that the parallel running and recorded announcement statements are measures which are open to amendment in special cases, with ODTR approval.*
- *To ask the NAP to consider the draft industry process for number changes, attached as Annex 7, as a long-term replacement for the current Convention 3.2-6.*
- *To address the rights of end-users by inclusion of a change to section 8.2, identifying a holder's right to retain its already allocated numbers, in all normal circumstances.*

## **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 is 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.

- Most applicants agreed with the broad eligibility requirements of section 4.1, though two respondents felt they should be more clearly defined and one was concerned that eligibility criteria for secondary allocation is less well covered than for primary allocation.
- There was general agreement with the ODTR position on using the principle of 'first come, first served', though with some comments.
- There was total agreement with the ODTR position on allowing applicants to indicate their preferences for numbers or codes while ensuring that the NPM shall have the final say, though again some comments were provided.
- There was strong agreement with the ODTR position of secondary allocation of numbers being subject to the National Numbering Conventions (NNC), though (as before) two respondents believed that secondary allocation should be left to commercial forces and not be covered by the Conventions.
- One respondent expressed its view that ODTR should not issue secondary numbers. Conversely, one respondent felt that the rights of end users vis-à-vis secondary allocations should be set down clearly.



***The Director has carefully considered all the responses and has decided:***

- *It is in the public (i.e. end-users) interest to include requirements for secondary allocation in the Conventions and that this cannot be left totally to market forces. Therefore she has decided to retain Section 4.1.2 in the National Numbering Conventions.*
- *For the same reason, to retain her existing right to allocate numbers directly, if she should feel this is necessary at any stage.*
- *That Convention 4.1.1-2 should be supplemented with a statement that allocation shall be carried out in an open, transparent and non-discriminatory manner.*
- *To include certain Conventions in sub-section 4.1.2 corresponding to those in sub-section 4.1.*

## **4.2 Information required when making an application**

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

## **4.3 Refusal of primary or secondary allocation**

Refusal to allocate numbers or codes has serious implications for the applicant and therefore such decisions are not 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, within the legal framework for licencing. 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.

- The majority of respondents agreed that operators and service providers should be entitled to reject secondary applications and set secondary allocation conditions for their customers themselves, rather than leaving this to the ODTR.
- One respondent added that ODTR should nevertheless set the rules and investigate disputes.
- There was general agreement with the proposals for an applicant's first level redress procedure, as described in Conventions 4.3-4(ii) and 4.3-4(iii), though one respondent pointed out that (where rejection is by an operator) the ODTR should consult the operator as well as the applicant.
- One respondent proposed that the option of over-riding an operator's refusal should be included.

***The Director agrees with the respondents on these points and accordingly has decided:***

- *That the existing Convention 4.3-2 should remain unchanged.*
- *To amend Convention 4.3-4(iii) so that it includes consultation with the operator (if necessary) and that it should allow for a possible determination that requires acceptance of the original application.*
- *To rationalise Conventions 4.3.4 and 4.6 by redistribution of some content from Convention 4.3.4 to Convention 4.6.*

## **4.4 Confidentiality**

There were several concerns about the Conventions dealing with confidentiality, despite the general support given.

- Individual operators felt either that:
  - ODTR should warn those concerned before releasing confidential information, or
  - It should avoid releasing information about new services to competitors, or even that
  - It should be bound not to release confidential information under any circumstances.
- One respondent noted that there should also be a statement covering confidentiality in respect of secondary applications made to an operator.

*Having considered these comments, the Director:*

- *Has decided that an additional statement should be added to cover information provided in support of secondary allocations.*
- *Is satisfied that the existing statutory obligations regarding confidentiality adequately address concerns that have been expressed. Nevertheless, she has decided that the wording of Section 4.4 should be made more explicit.*

#### **4.5 Timescales for applications**

Some respondents to this sub-section assumed the figures given for response by the ODTR were targets, rather than outside limits.

- There was an even division between assent and dissent to the conventions defining timescales. Dissenters considered that the 2-month limit for notification of decision, following receipt of an application, was too long. 1 month and 2 weeks were both suggested as being more appropriate.
- Some respondents also felt that requests for additional information should not result in more than 2 weeks extra delay after receipt of the information.
- Only one respondent felt the Conventions covering exceptions to normal timescales were unsatisfactory; It felt that an expedited process should be provided to cover cases of immediate need.

*The Director has carefully considered the responses received and decided that:*

- *The response by ODTR in normal circumstances to a properly completed application should not exceed 1 month (c.f. 2 months in the present draft).*
- *No change will be made to the Conventions dealing with additional delays caused by incomplete application paperwork. Significant variations will occur between individual such cases and the delays involved are likely to be outside the ODTR's control.*

#### **4.6 Appeals**

There was very broad agreement with the present Convention on appeals, though two respondents wanted more detail to be added and a third wished to see a cross-reference to the related Convention 4.3-4.

*The Director welcomes these responses and has concluded that moving the present Conventions 4.3-4(ii) and 4.3-4(iii) to section 4.6 has the potential to rationalise the Conventions on appeals whilst also largely satisfying the comments submitted.*

### **5. Reservation of numbers**

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

#### **5.1 Primary Reservation by Operators**

- All respondents agreed with the principle of allowing operators to make number reservations, although one respondent was concerned that some operators might request excessive reservations.
- Some concerns were expressed about ambiguous terminology in Convention 5.1-1(ii) in respect of “divulgence” of information and at Convention 5.1-2(ii) concerning its use of the words “any organisation” in relation to primary reservation of numbers.
- All respondents agreed with the present approach to activation of reserved numbers in the conventions. Two of these respondents sought further definitions to distinguish reserved numbers from allocated numbers and to show how to move from one to the other.

- One respondent thought the existence of reservation meant allocation could be accelerated.
- All except one respondent agreed with the cancellation and change conditions attached to reservation in this section, including the time related conditions. However, two of these would prefer explicitly defined timescales. *[Note: The exception case believed there was a contradiction between the 3 year information request (Convention 5.1-2(i)) and the 3 month reservation limit (Convention 5.1-8).]*

***Having considered this feedback from respondents, the Director has decided:***

- *To guard against excessive requests for reservations by an appropriate addition to the text of Convention 5.1-5(iv).*
- *To clarify that the reference to 'divulgence' in Convention 5.1-1(ii) applies only to public disclosure, rather than proper disclosure to the ODTR.*
- *That no changes are needed at present in respect of activation of reserved numbers. Convention 5.1 already (indirectly) provides a fair description of reserved numbers and the NAP may in due course discuss whether further definition would be helpful.*
- *That the cancellation and change conditions in the Conventions should not be changed at present, though the NAP may revisit this point if needed.*

## **5.2 Reservation by end-users**

- There was a small majority in favour of allowing end-users to reserve individual numbers and codes from operators.
- Most operator respondents (though not others) were against direct reservation through ODTR of numbers for end-users.
- One respondent requested a study of the impact of Number Portability.
- There was broad agreement with the conditions under which numbers may be reserved, although one respondent suggested that end-user reservations should only be allowed for expansion of existing capacity.
- There was also strong agreement with the principle that possession of a reservation by an end-user should not entitle operators to activate that capacity without the applicant first fulfilling the normal allocation criteria.
- There was clear support for the current cancellation and change conditions attached to secondary reservations, including the time related conditions, although one respondent wished to eliminate any uncertainty about (routine) renewal of reservations.

***Given this feedback from respondents, the Director has decided:***

- *To leave the bulk of the present conventions concerning secondary reservation by end-users unchanged.*
- *To retain her right to make direct reservation for end-users through the ODTR to ensure no market distortions or discriminatory situations arise.*  
*[Note: This right is only likely to be executed in special cases, if at all.]*
- *To amend Convention 5.2-7 so as to ensure that applicants renewing their existing reservations shall have preference over other candidates for the same number, so long as the renewal follows immediately on from the previous reservation.*

## 6. Allocation of short codes

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

- There was majority support for the current text describing the criteria for allocation of short codes, though one respondent noted the difficulties caused by the absence of a definition for short codes.
- One respondent felt that the overriding criterion for issue of a short code should be a need for easy recall of a generic service's number (e.g. 999) or of customer care codes (e.g. 190X). This respondent also wanted adjacent codes to not be used for dissimilar services.
- Another requested inclusion of a criterion to cover EU or international standardisation.
- A third (operator) respondent noted a need to formally distinguish network-specific codes from other short codes, while another felt that the roles and conventions associated with codes should be identified – in alignment with work at European level.

### ***Being mindful of the responses the Director has decided:***

- *To make no change to the present criteria for deciding on allocation of short codes.*
- *To add a criterion to allow for harmonisation with European and/or international numbering approaches.*
- *To add another criterion aimed at avoiding the allocation of adjacent codes for dissimilar services.*

*[Note: See Section 11.3 in respect of provision of a definition for 'short codes'.]*

## 7. Responsibilities for notification of number activation

*The draft National Numbering Conventions specify that the ODTR will provide notification to the involved party of the details of any allocation or reservation made to it and will also post the information on its web site. The ODTR will maintain a list of contact points for any relevant organisations that must be made aware of allocations and will make that available on request. However, the actual notification to all relevant individuals was stated to be the responsibility of the party receiving the allocation/reservation.*

- While there was a strong majority in favour of the current text concerning notification of activation, the comments of several respondents showed a wish for ODTR to be central to the provision of efficient industry indications of the allocation, reservation and activation of resources.
- In addition, one respondent sought an agreed description for the process by which notification of number activation is carried out.
- Another respondent felt a work group should be set up to ensure operators carry out their duty of notification.

### ***In view of the strong support received for the present Conventions, the Director has decided:***

- *To make no changes to the present text and to continue with the ODTR's existing central role, as described in this section.*
- *To ask the NAP to recommend a long-term agreed process for notification by allocation recipients to all relevant parties of the activation of numbers.*

## 8. Right to use numbers, number blocks and codes

Numbers are a national resource, the management and use of which is regulated by the ODTR. The consultation paper posed a series of questions on this operation.

- One respondent noted that Conventions 8.1-1 to 8.1-3, despite the section title, actually offer no rights.
- Another suggested there is a need to handle the demand for numbering of new emerging demands from customers.
- One respondent to section 8.2 felt the section should more clearly identify that users have a basic right to have numbers allocated, as well as a right to ongoing use of those numbers so long as its subscriptions are maintained. A second agreed that end-users must be able to retain the numbers assigned to them which are in use. Furthermore, the latter felt that there should be restraints on operators to prevent them making number changes without the owner's permission.
- Two operators, conversely, felt that the National Numbering Conventions should cover rights "associated with numbers" rather than rights "to numbers".
- Another comment was that the definitions and procedures relating to frequent misdialling and malicious calls need to be clarified.

***Being mindful of the concerns expressed, the Director has concluded that:***

- *The wording of Conventions 8.1-3 and 8.2-3 should be revised to transform them into rights of use.*
- *That the sequence of Conventions 8.1-2 and 8.1-3 should be reversed and the present Convention 8.2-2 should be moved to the end of its section, to enhance the perspective of rights vis-à-vis obligations.*
- *That a new Convention should be added to Section 8.2 to emphasise a users right to retain its number in all normal circumstances (i.e. except in case of abuse), so long as the subscription is maintained.*
- *To request the NAP to study and make recommendations on appropriate definitions and procedures for handling frequent misdialling and malicious calls.*

## 9. Audit information required from service providers

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 that is collated and published, it is also important for the ODTR's oversight role that it should possess accurate facts and figures on the status of networks.

- While some concern was expressed that unnecessary information should not be requested from busy operators, there was a high level of agreement that the information described in Section 9 was reasonable.
- In supplementary comments, one respondent stated that frequent and regular provision of information should be required of operators (i.e. not just upon ODTR request). Another agreed with this viewpoint, but felt that yearly provision should be sufficient for 'routine' information. A third considered there should be an examination of what is actually practicable.
- One respondent felt the audit timescales should be in the Conventions.
- It was also noted that the title of section 9 mentioned 'Service Providers', whereas the text underneath referred to 'operators'.

*The Director is pleased with the near total support for the ODTR auditing proposals, while she also understands the concerns expressed. She has decided:*

- *To avoid defining generically applicable audit timescales at present, as to be more specific is likely to result in more frequent periodic requests rather than less, or in extra information being requested, which would not be helpful to operators.*
- *That audit requests will in each case themselves define the categories of information requested.*
- *That the references to Service Providers and operators should be rationalised throughout the National Numbering Conventions.*

## **10. Charging for Numbering Allocations**

There were no specific questions for consultation in this sub-section.

## **11. Conditions of use for numbers and short codes**

### **11.1 General conditions**

This sub-section of the conventions is intended to address the general conditions of use for numbers and short codes. The following sub-sections address more specific number types.

- There was very strong agreement with the ODTR proposals for record retention although the difficulty of providing real figures in real time was pointed out.
- There was a two-to-one majority in favour of barring number trading. One respondent queried how to police it and proposed that a responsibility should be placed on operators in respect of secondary trading of numbers.
- One respondent raised the issue of ‘franchise’ use of numbers allocated to it, feeling that this should not be regarded as number trading (nor require withdrawal/re-allocation, as numbers are passed among franchise holders).
- Three respondents were concerned that the situation of mergers, take-overs, moving to new premises etc. should be catered for (even when name changes occur), without the need for withdrawal/re-allocation of the numbers concerned.
- There was broad agreement with the ODTR position on the tariff-related statements. Nevertheless, one operator felt the tariffing Conventions are unduly restrictive, while another felt the relationship between numbers and tariffs is becoming constantly more diluted and this should not be constrained.
- One respondent suggested that any categorisation by the Director in respect of tariff should be by reference to **maximum** tariff.
- There was clear agreement on the ODTR retaining its right to apply additional conditions of use, but the individual comments then also displayed a strong wish by operators for these conditions to first be the subject of consultation. The lone consumer response, conversely, was emphatic that the ODTR should **never** give up this right to ‘combatants in an open marketplace’ and that rules should be reviewed and updated wherever necessary to protect the public.

*Having considered this range of viewpoints, the Director has decided:*

- *To make an addition to Convention 11.1-5 that supports the implementation by those making secondary allocations, of the ban on number trading.*
- *That each case of ‘franchising’ of numbers must be judged on its own merits to establish whether or not a de-facto transfer has occurred.*  
*[Note: Therefore no change is proposed to the Conventions in that respect].*
- *That section 11.1 should be amended to clarify that mergers, take-overs and moving of premises are not considered to be number transfer and they can occur without loss of existing numbers.*

- *That no change should be made at present in respect of the tariff-related statements, apart from inserting the word 'maximum' before 'tariff' in Convention 11.1-7. However, the NAP may later decide to take up the issue of relationship of tariffs to numbers.*
- *That no change should be made in Convention 11.1-8, concerning 'additional conditions of use'. The Director understands the views expressed and considers that her present approach to the Conventions and to consultations is already in line with the thrust of the responses.*

## **11.2 Subscriber numbers usage**

- There was a clear difference between the views of the two (non-network operator) service providers who responded and all others in respect of the usage conditions for secondary number allocation. The former wished for a much more complete treatment of usage conditions whereas the latter either agreed with the present text or even felt that secondary allocation did not belong in the Conventions.
- Two respondents want ODTR to provide identification of numbers that 'might interfere with the National Numbering Scheme'.
- Most respondents agreed with the present usage conditions for bursty numbers. However, two operators felt that this is a quality of service issue associated with network management techniques and therefore it shouldn't be included in the Conventions.
- Respondents were evenly split on the question of sanctions for bursty traffic offenders, between those who wished them to be left to interconnect agreements and those who wanted a more robust response, involving withdrawal of service. The former interpreted the question as being related to handling of bursty traffic across network interfaces. One respondent pointed out that the subscriber whose number is the source/target for the traffic may not always be responsible for the excess traffic.
- One operator felt that warning notices concerning bursty traffic should first emanate from ODTR which should then itself withdraw the culprit's number after repeated warnings (i.e. not leave this to the operator).

### ***Having all responses in mind, and without prejudice to her rights and obligations to regulate the market, the Director:***

- *Has decided to make no changes at present in respect of the usage conditions for secondary numbers, but to ask the NAP to consider possible expansion of section 11.2.2 in due course.*
- *Through the ODTR, will provide notification to the parties concerned of any numbers that potentially interfere with the National Numbering Scheme (as described in Convention 11.2.1-4), as these are identified or as blocks containing them are reserved or allocated.*
- *Has decided to leave the present text on bursty numbers (including that on sanctions) unchanged. In the present Irish networked environment any problems arising from bursty traffic might well seriously impact an operator other than the one responsible for that traffic in the first place.*
- *Requests the NAP to study whether change is needed in the Conventions on sanctions to be taken against bursty traffic offenders.*

## **11.3 Conditions of use for specific number types**

- There was either complete agreement or a strong majority for each of the conventions in Section 11.3, though in some cases individual comments were contributed.
- The majority of responses were in favour of the current text for short code usage, though two respondents felt unable to agree (or disagree) with Convention 11.3.1 on short codes, without a specific definition of short codes.
- One respondent felt that no bursty traffic should be allowed on short codes.
- One respondent proposed specifically relating the words of Convention 11.3.2 concerning charging for Freephone calls, to the originating caller.

- An anomaly was pointed out by one respondent in the Convention on Universal Access Numbering concerning the special national tariff rates at weekends. The Convention needs amending to exclude the risk of below-cost charging corresponding to this.
- Despite the near two to one majority in favour of the existing Personal Numbering (0700) Services Convention (which is recommendation 5 of the Task Force on Numbering), there were concerns that its wording might be unduly restrictive.
- There was some confusion about NUSC codes, showing that this is an area that will benefit from discussion and definition within the NAP. In particular, discussion of relationships to tariffs may be helpful, as well as clarification of the differences between customer-dialled NUSCs and non-dialled network routing NUSCs.

***Given this level of support and the helpful comments submitted, the Director has decided:***

- *To keep the basic Conventions of this section unchanged, apart from the following.*
  - *To insert the words “originating callers” after “shall not charge” in the Convention on Freephone usage (Convention 11.3.2).*
  - *To improve the words of Convention 11.3.4 (Universal Access (0818) services) and refer therein to the standard national tariff rate (excluding weekend rates or special offers).*
- *To initially make no changes to Convention 11.3.5 (personal numbering services), as these services are still undeveloped in Ireland. Nevertheless, she asks the NAP to list this as an issue for its early consideration, in order to resolve the concerns identified in this consultation.*
- *To ask the NAP to recommend an agreed definition for ‘Short Codes’, to be added later to the National Numbering Conventions.*
- *To also ask the NAP to study the case of Network Unique Short Codes (NUSCs) and provide its recommendations for any improvements in the Conventions.*

#### **11.4 Use of Premium Rate Numbers**

- There was a very high level of support for the Conventions on Premium Rate Numbers, though two respondents felt they do not have sufficient clarity as to who is eligible to receive number allocations.
- Furthermore, two respondents suggested a change of wording to Convention 11.4-3 to align it more closely with Decision Notice D5/98, while another suggested useful additional words.

***In view of this level of support, the Director has decided to leave Section 11.4 unchanged, apart from amending the words of Convention 11.4-3, as proposed by respondents.***

#### **11.5 Geographic number usage - Definition of areas**

- There was a clear majority in favour of the Convention on Geographic number areas. However, one respondent noted that out of area lines and call forwarding should not be precluded by the Conventions.

***The Director has decided that:***

- *A note should be added to Convention 11.5-2 making it clear that call forwarding is not considered to be a violation of that Convention.*
- *The issue of whether any change is needed to the Conventions in respect of out-of-area lines will be referred to the NAP for study.*



## **11.6 Portability of numbers**

*Following publication of Decision Notice DI/99: “Introducing Number Portability in Ireland” and the conclusion of initial industry discussions within the framework of the Committee for Number Portability, the Director has decided to add the following to Section 11.6 of the National Numbering Conventions:*

- *All operators with Non-geographic number allocations are obliged to offer Non-geographic Number Portability to their customers.*
- *From 1 July 2000, eircom, and all operators requesting Number Portability from eircom for current eircom customers which wish to transfer to them, shall be capable of also offering Geographic Number Portability to their own customers.*
- *From 1 November 2000, all operators with Geographic number allocations are obliged to offer Geographic Number Portability to their customers.*

## **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).

- Most responses referred to secondary allocation/withdrawal. These show that Convention 11.7.1-5 cannot be simply referenced by Convention 11.7.2, as is presently done.
- Some respondents (again) disagreed that secondary allocations should be considered.
- Some comments suggested that timescales need to be explicit in Conventions 11.7.1 and 11.7.2
- Although there was only one respondent opposed to the Conventions relating to quarantine of numbers, three respondents suggested that flexibility should exist in case number shortages in special cases cause difficulties.

***The Director has carefully considered these responses and decided that:***

- *The principle of including Conventions for secondary allocation / reservation/ withdrawal should be retained – see section 0.3.*
- *Convention 11.7.2 should be reworded to remove some ambiguity in respect of correspondence between requirements of Conventions 11.7.1 and 11.7.2.*
- *As the precise definition of timetables for withdrawal or change of numbers is difficult and cannot be quickly resolved in a way that meets all contingencies, the NAP should consider this matter and make recommendations, if appropriate.*
- *A fifth convention should be added to sub-section 11.7.3, allowing the Director to make exceptions to the quarantine conventions where difficulties with numbering capacity might make the other conventions inappropriate.*

## 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.

- There was complete agreement with the Convention on standards for alphanumeric keypads. Some supplementary suggestions were made, including the addition of 'Option A' to the reference to E.161, a proposed requirement for numbers to always also be shown in dialling apparatus containing letters, and a recognition that not all installed terminals may have alpha characters.
- There was also broad support for the Convention on presentation of numbers, though with hesitation about the use of full stops between number sets.

***Taking account of these remarks, the Director has decided:***

- *That 'Option A' should be specified in the reference to ITU-T Recommendation E.161.*
- *That a sentence should be added after the note concerning full stops in Convention 12.2 to show that the use of spaces (in accordance with ITU-T Recommendation E.123) is preferred.*
- *Not to mandate the use of numbers in dialling apparatus containing alpha-characters, as it is not clear that it would be legitimate to do so.*
- *To take account in the Conventions of some additional editorial remarks made by respondents.*

## 13. Mandatory dialling procedures

- There was good agreement with the Convention on dialling of local calls using national dialling or local dialling. However, one operator noted that in situations where a CPS carrier has been selected for national calls AND where a local number has been called using national dialling, the cost of the call will depend on the CPS carrier's rates.
- Two operators expressed reservations regarding calls to Northern Ireland, although their doubts concerned different aspects. One was concerned about the format of calls handed over to Northern Ireland operators, while the second felt that calls dialled using full international dialling (i.e. 0044) should be charged the same as calls using national dialling.
- Another respondent was concerned with minimising the impact of misdialled calls to Northern Ireland after the UK number changes come into effect in April 2000.
- Another respondent noted that all calls within an NDC area are local and so suggested removing the word 'local' from Convention 13.1-3. It also noted that some calls between NDC areas are local.

***Taking account of these responses, the Director has decided:***

- *That no changes should be made to the Conventions in respect of dialling local calls.*
- *To leave the tariff aspects of the Conventions on dialling to Northern Ireland unchanged (i.e. no ban on higher charges if numbers are dialled using full international codes, leaving this subject to control by market forces). [Note: The ODTR has already contacted operators to ensure that all can handle the appropriate national and international dialling of calls to Northern Ireland and no change is needed to the Conventions in that respect.]*
- *That the ODTR should deal directly with any undue levels of misdialled calls to Northern Ireland notified to her, as a result of the UK code changes of April 2000. No National Numbering Convention changes are therefore envisaged in that respect.*

## 14. Publication of dialling and numbering scheme Usage

Comment was limited on Section 14 of the draft National Numbering Conventions.

- Two respondents requested that operators should be notified when new allocations are made.
- One of these also wished for news of other ODTR activities to be provided regularly – rather than by reliance only on the ODTR web site.

*The Director wishes to support industry requests for early information and she has already taken steps to provide email alerts to interested parties about items of interest from the ODTR (consultations, press-releases, projects etc.). However, in the present context, these matters are outside the scope of the National Numbering Conventions.*

## 15. Revision of the National Numbering Conventions

The Director believes that building-in principles for review of the national Numbering Conventions from the outset improves their ongoing utility. And 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.

- Only one respondent disagreed with Convention 15-6, which invites operators, users and others to make submissions on new or amended Conventions. This was by an operator which requested that clear rules should be set down covering the revision process.
- One respondent suggested the addition of ‘International events, including standards’ to Convention 15-7(iv), which covers revision of the National Numbering Conventions.
- Another requested that the content of reviews should be included in the Conventions.
- A third respondent recommended annual reviews of the conventions, or at least that precise timescales should be set down.

*The Director notes this satisfaction with the proposed review process and has decided that:*

- *A new bullet point ‘International developments, including Standards’ should be inserted before the present Convention 15-7(iv).*
- *Information about the general content of a review should be provided as part of any large-scale ‘consultation with interested parties’, of the type referred to in Convention 15-3.*
- *The present Conventions, amended as described herein, already offer maximum flexibility to all to propose revisions whenever a need arises. Therefore no changes are proposed to Convention 15-6.*

## Annex 1: Eligibility Criteria for Applicants

This section covered Criteria for Geographic Numbering, Non-Geographic Numbering, Carrier Access/Carrier Selection Codes, Directory Enquiry Access Codes and Internet Access Numbers. Clear majority support was given to all existing Conventions, with a range of helpful comments also being submitted, as follows.

- There was only one dissenting submission to the eligibility criteria for geographic numbers. This questioned the ODTR's requirement for a marketing plan.
- Some additional dissenting views related to the requirement to hold a General Licence (i.e. for primary allocations/reservations), though their concerns related to users, which would not be applicants for primary allocation or reservation in any case.
- One respondent wished to make it clear that mobile networks are not currently required to provide CPS facilities, while a second wished for the differences between Carrier Access and Carrier Selection to be defined.
- Some dissenting views on the eligibility requirements for directory enquiry codes were concerned with the information requested by the ODTR (e.g. on Quality of service targets).
- Comments were made on the present conventions on Internet codes. Two respondents wished for a definition of 'ISP' and one of these stated that only eligible entities should be allowed to apply for the Internet access codes.
- Some specific questions were asked (e.g. What is the meaning of 'local' in 'local point of presence').
- One respondent wished for mobile numbering and Internet/IP numbering to be included in this section.
- Two respondents (to questions on Annex 2) were concerned that eligibility criteria for secondary allocation are not defined.

### ***Taking account of the very favourable responses, the Director has decided:***

- *That no changes will be made to most sub-sections of Annex 1.*
- *While recognising that the question of Internet access codes raises many inter-connected issues and/or questions, reflecting the rapidly changing technologies and relationships in this field, the present Numbering Conventions should remain limited in coverage to avoid restrictive definitions, conditions or requirements. They may be extended if necessary following the first review. The only change that will take place at this stage in that respect is to delete the reference to 'local' in Convention A1.5-1.*
- *That mobile numbering should be included as soon as possible in the Conventions and the NAP should be tasked with providing recommendations for a section or sections covering this.*
- *Not to include IP numbering at present as there is still no clear consensus in the wider community about how to handle this and the European Commission<sup>2</sup> has identified it as 'an issue to be kept under review, at present'. Nevertheless she agrees that as soon as lasting solutions are defined the Conventions should cover IP numbering.*
- *To ask the NAP to recommend additional Conventions for Sections A1.1 and A1.2 (Geographic and Non-geographic eligibility criteria), covering eligibility for secondary allocation or reservation.*

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<sup>2</sup> COM (1999) 539: The 1999 Communications Review.

## **Annex 2: Grounds for rejecting an application**

This section covers refusal of primary or secondary allocation or reservation.

- There was 100% support for the present conventions on refusal of primary allocation/reservation, with a small majority in favour of the present Conventions on refusal of secondary allocation / reservation.
- The doubts of some respondents about refusal of secondary allocation/reservation varied from a wish for more detailed descriptions of reasons for rejection (by non-operators) to a view that secondary allocation/reservation should be excluded at this time (two operators).
- One respondent wished to include a Convention that recognises an obligation on primary assignees to allocate numbers to end-users and provide ongoing rights of use.
- Another proposed a new Convention allowing refusal of secondary allocation/reservation if a previous allocation has been used for services other than those specified or permitted.
- Another respondent proposed the inclusion of a formal procedure to challenge unfavourable decisions.
- One respondent considered that allowing operators to refuse to make an allocation which is ‘against their own commercial interests’ is a ‘frightening’ basis for rejection of an application.

***The Director is pleased with the support provided and the thoughtful responses made. She has decided:***

- *To add a new Convention to each of Sections A2.1 and A2.2, allowing refusal of an application where a previous allocation has been used for services or purposes other than those specified or permitted in the terms of allocation or reservation.*
- *To restructure Conventions 4.3-4 and 4.6, as described earlier herein. She considers those sections provide the appeals procedure sought by respondents to this Annex, in respect of challenging formal procedures.*
- *That defining agreed levels for ‘under-utilised’ for each type of allocation would be difficult and the result might well be unhelpful to industry by removing flexibility that exists at present. Therefore the existing Convention A2.1-6 will remain unchanged.*
- *That she cannot agree that secondary allocation should be left to operator-customer relationships, while primary allocation is subject to the Conventions. It is in the interests of users that their corresponding rights and responsibilities should be clearly covered by the Conventions.*
- *While she understands the reasons for alarm by one respondent at the prospect of operators refusing to grant secondary allocations or reservations if their own commercial interests are thereby threatened, she nevertheless considers this is a safeguard that must be available to operators. [Note: If the refusal is an abuse of competitive position then the applicant may, inter-alia, use the appeals procedure of Section 4.6 to request corrective action by the Director and/or direct allocation/reservation of numbers by her.]*

### **Annex 3: Information required from Applicants for Primary Allocations**

- One respondent noted that Convention A3-4 should include number blocks as well as codes.
- Two others commented on the difficulty of producing reliable statistics of usage in real time, one of these suggesting the use of quarterly audits.

*Being mindful of the strong vote for the existing Conventions, as well as the comments made, the Director:*

- *Agrees that Convention A3-4 should be amended to cover both number blocks and codes.*
- *Understands the concerns of operators that have to collect operational data in support of their numbering applications but believes this data should be available to them for operational reasons in any case. No other changes will therefore be made in this section of the Conventions. [Note: As this data is needed in respect of Annex 3 only for indicative purposes (i.e. to show proof of need and of consumption of previous allocations), its real-time accuracy may be considered less critical than the audit information required to comply with section 9.]*

### **Annex 4: Grounds for withdrawal of Numbers**

- A very high level of support was expressed for the principles espoused in the present conventions on withdrawal of allocations/reservations, though with some reservations.
- Individual respondents wanted definition of the term ‘insufficient usage’ and ‘brought into service’, and two respondents felt that the conditions of use of numbers are not adequately defined. *[Note: these are already described in Section 11.]*
- One respondent was concerned with the impact on customers if numbers/codes are withdrawn as a result of incorrect usage.

*The Director has reviewed the responses and decided that no changes should be made at present. All definitions will be reviewed before formal issue of the National Numbering Conventions and the NAP may also propose agreed recommendations for changes or additions at a later stage.*

### **Annex 5: Existing numbering arrangements<sup>3</sup>**

- There was strong support for the present description of existing numbering arrangements, though the omission of mobile numbering from the conventions was again noted.
- The fact that the example table is not a complete representation was also pointed out.

*The Director has decided that no changes should be made to this section.*

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

## Annex 6: Breakdown of Responses to Individual Consultation Questions

No	Question	Yes	No
<b>Section 1: Scope Questions</b>			
Q1-1	Do you agree with the general description of the Conventions' scope in the draft Conventions document?	6	1
Q1-2	Do you agree that the scope should be restricted to telephony, at least initially?	7	1
Q1-3	Do you have any other comments on Section 1 of the Conventions?	2	5
<b>Section 2: Definitions</b>			
Q2-1	Do you feel that the present minimal set of terms is sufficient?	5	3
Q2-2	Do you agree with the existing definitions?	2	6
<b>Section 3: Responsibilities</b>			
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?	8	0
Q3.1-2	Do you feel the ODTR's responsibilities are adequately defined in this sub-section?	8	0
Q3.1-3	Have any important issues been missed from this sub-section 3?	8	0
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)?	6	2
Q3.2-2	Do you agree with the publication requirements (Convention 3.2-5)?	5	2
Q3.2-3	Do you agree with the requirements for parallel running and recorded announcements during number changes (Convention 3.2-6)?	5	3
Q3.2-4	Do you disagree with any of the other Conventions in this sub-section?	5	3
Q3.2-5	Have any important issues been missed from this sub-section?	7	1
Q3.2-6	Do you have any other comments on any part of Section 3 of the Conventions?	2	7
<b>Section 4: Allocation of Numbers</b>			
Q4.1.1-1	Do you agree with the broad thrust of the eligibility requirements (primary and/or secondary)?	6	2
Q4.1.1-2	Do you agree with use of the principle of 'first come, first served'?	8	0
Q4.1.1-3	Do you agree that applicants should be allowed to indicate their preferences for numbers or codes but that the NPM <sup>4</sup> shall have the final say?	8	0
Q4.1.2-1	Do you agree that secondary allocation of numbers should also be subject to the National Conventions?	6	2
Q4.1.2-2	Do you agree with the present Conventions for secondary allocation in Section 4.1.2?	6	3

<sup>4</sup> Numbering Plan Management – a function within the ODTR.

No	Question	Yes	No
Q4.3-1 <b>OR</b>	Do you agree that operators and SPs, 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?	5	3
Q4.3-2	Do you believe that instead of this, all refusals or modifications should be done through the ODTR?	1	5
Q4.3-3	Do you agree with the applicant's first level redress procedure described in Conventions 4.3-4(ii) and 4.3-4(iii)?	6	1
Q4.4-1	Do you have you any comments on the proposed Conventions covering confidentiality?	5	3
Q4.5-1	Do you agree that the timescales of this section are reasonable?	4	4
Q4.5-2	Are the exceptions to normal timescales acceptable and sufficient in your view?	7	1
Q4.6-1	Do you agree with the applicant's appeal procedure described in Convention 4.6?	6	2
Q4-1	Do you have any other comments on any part of Section 4 of the Conventions?	1	6
<b>Section 5: Reservation of Numbers</b>			
Q5.1-1	Do you agree with the principal that operators should be allowed to reserve blocks of numbers or (individual) codes?	8	0
Q5.1-2	Do you agree with the stated conditions under which they may be reserved?	7	1
Q5.1-3	Do you agree that possession of a reservation should not <b>entitle</b> operators to activate the capacity and that the applicant should still have to fulfil the normal allocation criteria before activation is allowed?	8	0
Q5.1-4	Do you agree with the cancellation and change conditions attached to reservation in this section, including the time related conditions?	7	1
Q5.2-1	Do you agree with the principle that end users should be allowed to reserve individual numbers or codes?	5	3
Q5.2-2	Do you agree with the stated conditions under which they may be reserved?	5	2
Q5.2-3	Do you agree that possession of a reservation by an end user should not <b>entitle</b> operators to activate the capacity and that the applicant should still have to fulfil the normal allocation criteria before activation is allowed?	6	1
Q5.2-4	Do you agree with the cancellation and change conditions attached to reservation in this section, including the time related conditions?	6	1
Q5.1	Do you have any other comments on any part of Section 5 of the Conventions?	1	7
<b>Section 6: Allocation of Short Codes</b>			
Q6-1	Do you agree with the criteria for deciding on allocation of short codes, as described in this Section?	6	2
Q6-2	Have any important criteria been missed out?	2	5
Q6-3	Do you have any other comments on Section 6 of the Conventions?	2	6
<b>Section 7: Responsibilities for Notification of Number Activation</b>			
Q7-1	Do you agree with the statements concerning notification of activation, in this Section?	7	1



No	Question	Yes	No
Q7-2	Should anything else be added to this section?	3	5
Q7-3	Do you have any other comments on Section 7 of the Conventions?	2	5
<b>Section 8: Right to Use Numbers, Number Blocks and Codes</b>			
Q8.1-1	Do you agree with the common good statements and usage conditions of Section 8.1?	6	1
Q8.2-1	Do you agree with the common good statements and usage conditions of Section 8.2?	4	3
Q8.2-2	Do you agree with the user rights stated in Convention 8.2-4, 8.2-5 and 8.2-6?	6	2
Q8-2	Should anything else be added to either Section 8.1 or Section 8.2?	2	4
Q8-3	Do you have any other comments on Section 8 of the Conventions?	0	7
<b>Section 9: Audit Information required from Service Providers</b>			
Q9-1	Do you agree that the information requested in Section 9 is reasonable?	7	1
Q9-2	Do you have any other comments on Section 9 of the Conventions?	6	2
<b>Section 10: Charging for Numbering Allocations</b>			
	There are no specific questions for this sub-section.		
<b>Section 11: Conditions of Use for Numbers and Short Codes</b>			
Q11.1-1	Do you agree with the record retention requirements of Section 11.1?	7	1
Q11.1-2	Do you agree with the bar on number trading and with the conditions applied to number transfer?	6	3
Q11.1-3	Do you agree with the tariff-related statements in this section?	6	2
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?	6	2
Q11.2.1-1	Do you agree with the usage conditions for Primary (and secondary) allocation?	8	2
Q11.2.3-1	Do you agree with the usage conditions for bursty numbers?	6	2
Q11.2.3-2	Do you have particular views on sanctions to be taken against bursty traffic offenders?	4	4
Q11.3.1-1	Do you agree with the Convention for Short Code Usage?	6	2
Q11.3.2-1	Do you agree with the Convention on codes for Freephone (1800) services?	8	0
Q11.3.3-1	Do you agree with the Conventions on codes for Shared Cost (1850 & 1890) services?	8	0
Q11.3.4-1	Do you agree with the Convention on codes for Universal Access (0818) services?	7	1
Q11.3.5-1	Do you agree with the Convention on codes for Personal Numbering (0700) Services?	5	3
Q11.3.6-2	Do you agree with the Convention on Directory Services access code 118?	8	0
Q11.3.7-1	Do you agree with the general Conventions on NUSCs in Section 11.3.7?	5	3
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?	8	1

No	Question	Yes	No
Q11.4-2	Do you agree with the other Conventions on codes for Premium Rate Services in Section 11.4?	9	0
Q11.5-1	Do you agree with the Conventions relating to geographic areas in Section 11.5?	7	1
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?	7	2
Q11.7.3-1	Do you agree with the Conventions relating to quarantine of numbers, in Section 11.7.3?	7	1
Q11-1	Do you have any other comments on Section 11 of the Conventions?	1	6
<b>Section 12: Use of Numbers and Alpha-numeric Characters</b>			
Q12.1-1	Do you agree with the Conventions on standards for alphanumeric keypads?	8	0
Q12.2-1	Do you agree with the Conventions on presentation of numbers?	6	2
Q12-1	Do you have any other comments on Section 12 of the Conventions?	1	6
<b>Section 13: Mandatory Dialling Procedures</b>			
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 NDC <sup>5</sup> ), or local dialling (i.e. using only the subscriber number)?	6	1
Q13.2-1	Do you agree with the Conventions relating to calls to Northern Ireland, including the tariff aspects?	3	2
Q13-1	Should anything else be added to this either Section 13.1 or Section 13.2?	1	4
Q13-2	Do you have any other comments on Section 13 of the Conventions?	1	6
<b>Section 14: Publication of Dialling and Numbering Scheme Usage</b>			
Q14-1	Do you have any comments on Section 14 of the Conventions?	2	5
<b>Section 15: Revision of the National Numbering Conventions</b>			
Q15-1	Do you feel that this Section on revision adequately addresses the correct issues?	6	1
Q15-2	Do you agree with the proposed timescales?	6	1
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?	6	1
Q15-4	Should anything else be added to this Section?	1	6
Q15-5	Do you have any other comments on Section 15 of the Conventions?	0	7
<b>Annex 1: Eligibility Criteria for Applicants</b>			
QA1.1-1	Do you agree that the criteria set for eligibility to apply for geographic numbers are reasonable and satisfactory?	7	1
QA1.1-2	Should anything else be added to this Annex 1 Section?	1	7
QA1.2-1	Do you agree that the criteria set for eligibility to apply for non-geographic numbers are reasonable and satisfactory?	6	2

<sup>5</sup> National Destination Code (See Annex 5 for explanation)

No	Question	Yes	No
QA1.2-2	Should anything else be added to this Annex 1 Section?	1	7
QA1.3-3	Do you agree that the criteria set for eligibility to apply for Carrier Access/Carrier Selection codes are reasonable and satisfactory?	8	0
QA1.3-4	Should anything else be added to this Annex 1 Section?	0	8
QA1.4-1	Do you agree that the criteria set for eligibility to apply for Directory Information Access codes are reasonable and satisfactory?	7	1
QA1.4-2	Should anything else be added to this Annex 1 Section?	0	8
QA1.5-1	Do you agree that the criteria set for eligibility to apply for Internet Access codes are reasonable and satisfactory?	6	2
QA1.5-2	Should anything else be added to this Annex 1 Section?	3	4
<b>Annex 2: Grounds for Rejecting an Application</b>			
QA2.1-1	Do you agree that the grounds for rejection of primary allocation or reservation are reasonable and satisfactory?	7	1
QA2.1-2	Should anything else be added to this Annex 2 Section?	1	7
QA2.2-1	Do you agree that the grounds for rejection of secondary allocation or reservation are reasonable and satisfactory?	5	4
QA2.2-2	Should anything else be added to this Annex 2 Section?	3	5
QA2-1	Do you have any other comments on Annex Section A2 of the Conventions?	0	7
<b>Annex 3: Information Required from Applicants for Primary Allocations</b>			
QA3-1	Do you agree that the information required from applicants and the format are reasonable and satisfactory?	7	1
QA3-2	Should anything else be added to Annex 3?	2	6
QA3-3	Do you have any other comments on Annex Section A3 of the Conventions?	0	8
<b>Annex 4: Grounds for Withdrawal of Numbers</b>			
QA4.1-1	Do you agree that the grounds for withdrawal of primary allocation or reservation are reasonable and satisfactory?	7	1
QA4.1-2	Are the 'considerations to be addressed before primary withdrawal' satisfactory?	7	1
QA4.1-3	Should anything else be added to this Annex 4 Section?	0	7
QA4.2-3	Do you agree that the grounds for withdrawal of secondary allocation or reservation are reasonable and satisfactory?	5	4
QA4.2-4	Are the 'considerations to be addressed before secondary withdrawal' satisfactory?	5	3
QA4.2-5	Should anything else be added to this Annex 2 Section?	1	7
QA4-1	Do you have any other comments on Annex Section A4 of the Conventions?	0	7
<b>Annex 5: Existing Numbering Arrangements</b>			
QA5-1	Do you have any comments on Annex Section A5 of the Conventions?	3	5

## Annex 7: Proposed Number Change Process

Stage No.	Activity	Responsibility	Comments
1	Decide on Number Change and Date*	ODTR	Network operator number changes should preferably be synchronised with the issue of a new telephone directory
2	Consultation on implementation issues	ODTR, affected network operators & affected service providers	
3	Announcement to (own) customers	ODTR and/or affected network operators	Tell them the change date. Also tell them all other timescales?
4	Published notice for (own) customers	Affected network operators	3 months before change date?
5	Activation of 'new' number	Affected network operator	
6	Period of parallel working	Affected network operator	1. May not always apply 2. Recommended period for normal circumstances is 12 months.
7	Directory change	Directory provider	
8	De-activation of 'old' number	Affected network operator	
9	Recorded announcement	Affected network operator	1. May not always apply 2. Recommended period for normal circumstances is 6 months after end of parallel running. 3. Can generic message be defined?
10	Quarantine of old numbers	ODTR	Normally for 1 year (see Convention 11.7.3-4)

\* The number change date is considered to be the date after which connection to the called party, by dialling the 'old' number ceases and it is necessary to dial the 'new' number to get connected to the called party.

*[Note: this is usually also the date on which the 'old' number is connected to a recorded announcement.]*