# Numbering Conditions of Use and Application Process

Submissions to Consultation 17/102

**Submissions to Consultation**

**Reference:** 18/44s

**Date:** 01/06/2018

# Submissions Received from Respondents

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| Document No: | 18/44s |
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| Consultation: | 17/102 |
| Response to Consultation: | 18/44 and D05/18 |

# Content

**Section**                                                             **Page**

# 1: BT Ireland

**BT Communications Ireland Ltd "BT" Response to ComReg's Consultation on:**

**Numbering Condition of Use and Application Process.**

**Issue 1 – 18 January 2018**

**1.0      Introduction**

**Please find attached BT's response to this helpful consultation.**

**2.0      Response to Questions**

**Q. 1 Do you agree with ComReg's proposed amendment to the condition on Number Portability? Please explain the basis for your response in full and provide any supporting information.**

R.1 Whilst we agree with the principle of ComReg's proposal we have a major concern with the porting charges applied by one operator which can be in the range of tens of thousands of Euro to port a large block. Comparing this with the six Euro charge for the same by PortingXS highlights the unreasonableness of this unfair charge. Due to these very high charges we cannot agree this proposal and need to maintain block re-allocation process. We consider ComReg should urgently review and rectify this pricing before making this change.

**Q. 2 Do you agree with ComReg's proposed amendment to the existing condition relating to CLI that Mobile Numbers are not used as the presentation or network CLI for calls that originate from a fixed terminal? Please explain the basis for your response in full and provide any supporting information.**

R.2 We agree with this proposal given the potential high costs to end users.

**Q. 3 Do you agree with ComReg's proposed definition of a mobile service? Please explain the basis for your response in full and provide any supporting information.**

R.3. We consider reference to radio access should be added into the mobile definition as it's a fundamental part of the mobile service and distinguishes it from fixed.

**Q. 4 Do you agree with ComReg's proposal to introduce a new GA Condition in relation to undertakings providing access to numbers and services? Please explain the basis for your response in full and provide any supporting information.**

R.4 We agree with ComReg's proposal as it aligns with the European USO and Users Rights Directive for connectivity to national, international services whilst supporting the customer preference to for barring.

**Q. 5 Do you agree with ComReg's proposed introduction of utilisation targets for undertakings when applying for additional Geographic and Mobile Numbers? Please explain the basis of your response in full and provide any supporting information.**

R.5 We agree as numbers are a scarce resource and it is sensible to ensure they are managed responsibly to avoid exhaustion and disruptive and costly number change programs.

**Q. 6 Do you agree with ComReg's proposal to introduce an audit form for undertakings to complete when applying for additional Geographic Numbers in an MNA? Please explain the basis for your response in full and provide any supporting information.**

R.6 We agree this for the reasons in our response to question 5.

**Q. 7 Do you have any views on the future of the MNA concept? Please explain the basis of your response in full and provide any supporting information.**

R.7. We agree to maintaining the current MNA's' and welcome urgently the mapping data given the industry move to VoIP. If this is not done soon we are concerned that the MNA's will not be respected.

End

# 2: Eircom Limited

**eir Group**

**Response to ComReg Consultation:**

**Numbering Conditions of Use and Application Process**

**ComReg Document 17/102**



**18 January 2018**

**DOCUMENT CONTROL**

| Document name | Eircom Group response to ComReg Consultation Paper 17/102 |
|---|---|
| Document Owner | eir Group |
| Status | Non-Confidential |

The comments submitted in response to this consultation document are those of Eircom Limited (trading as 'eir' and 'open eir') and Meteor Mobile Communications Limited ('MMC'), collectively referred to as 'eir Group'.

**Response to Consultation Questions**

**Q. 1 Do you agree with ComReg's proposed amendment to the condition on Number Portability?**

ComReg proposes to remove the requirement for a number block-allocation process on the basis the new FNP solution is best placed to handle bulk ports. eir does not agree that the proposed change should be made. The work to carry out a block re-allocation in eir will still be a manual process – routing of calls of numbers in blocks is done at switch level rather than by the Next Generation Intelligent Network (NGIN). In terms of timeframe to carry out a block reallocation, eir would continue to require the notice period of the current process for block re-allocation because a re-allocation requires 55 switches to be manually updated. For example, if a block is re-allocated to another operator, the work is done manually and any numbers within the block previously ported to that operator would be removed from the NGIN.

It is not feasible for block reallocation to be handled exclusively through the new FNP solution because there is no pre-notification of a pending block re-allocation to facilitate commencement of the underlying manual processes.  Under the proposed new FNP solution the first knowledge of a block re-allocation having taken place that is received by eir would the broadcast from the FNP Solution that a block re-allocation has taken place. However in the absence of the manual changes being made there will be routing problems for calls transiting open eir until such time as the necessary visits to each switch are completed and the routing for the block amended.

**Q. 2 Do you agree with ComReg's proposed amendment to the existing condition relating to CLI that Mobile Numbers are not used as the presentation or network CLI for calls that originate from a fixed terminal?**

eir has no objection to the proposed clarification.

**Q. 3 Do you agree with ComReg's proposed definition of a mobile service?**

The proposed definition for a mobile service is acceptable however eir believes its inclusion in the Numbering Conditions is otiose.

**Q. 4 Do you agree with ComReg's proposal to introduce a new GA Condition in relation to undertakings providing access to numbers and services?**

eir agrees with the re-instatement of text to articulate the obligations set out in Regulation 23 of the Universal Service and Users' Rights Regulations 2011.

**Q. 5 Do you agree with ComReg's proposed introduction of utilisation targets for undertakings when applying for additional Geographic and Mobile Numbers?**

eir agrees with the proposed utilisation targets as set out in the proposed Numbering Condition text at paragraph 39 of the consultation paper. ComReg defines utilisation as [Total active in use] divided by [total assigned-total ported out]. We believe that the formula should be amended to account for numbers in quarantine as required by the Number Conditions.

Therefore utilisation should be defined as [Total active in use] divided by [total assigned-total ported out-total in quarantine]. eir can see no reason why quarantined numbers should be excluded given that such numbers are in an efficient state of use as required by the Number Conditions.

**Q. 6 Do you agree with ComReg's proposal to introduce an audit form for undertakings to complete when applying for additional Geographic Numbers in an MNA?**

eir has no objection to an audit form being introduced for geographic numbers, consistent with the approach already in place for mobile numbers.

**Q. 7 Do you have any views on the future of the MNA concept?**

eir notes and agrees with ComReg's view expressed at paragraph 13 of the consultation paper. "*ComReg considers that having a minimum numbering area ("MNA") is working well at this time and ComReg therefore does not propose any changes in this regard.*"

ComReg notes the technical limitations of eir's traditional PSTN switches in paragraph 53 and observes that the move to Next Generation Voice Services could remove limitations in the future. eir believes that future consideration of the MNA concept should be considered within the wider context of eir's network modernisation programme (the 'Withdrawal of Copper based Regulated Services' workstream referred to in ComReg's Annual Action Plan).

**Q. 8 Do you have any views on any issues not discussed in this document and/or on issues which you feel are appropriate to the draft Numbering Conditions?**

eir has no further comment to make at this time.

# 3: Magrathea Telecommunications Limited

Brendan O'Brien
Commission for Communications Regulation
One Dockland Central
Guild Street
Dublin 1
Ireland                                                   *BY EMAIL ONLY*

16TH January 2018

Dear Mr O'Brien,

### Reference: Consultation 17/102 – Review of the Numbering Conditions of Use and Application Process

We welcome the opportunity to comment on your consultation on your review of numbering use and the application process.   Magrathea provides wholesale carrier services and managed solutions to communication service providers.

### Q2 – Amendments to CLI conditions relating to Mobile Numbers

We do not agree that this amendment to exclude the use of a Mobile Number as a CLI for calls originating from a fixed terminal is necessary and would also be difficult to implement.

With such widespread consumer awareness of mobile number formats and call charges we believe it unlikely that the receiving party can be negatively impacted by believing they have been called by a mobile.  If they choose to return the call they will be doing so with the knowledge that they will pay for a mobile call, regardless of where the call terminates therefore there is no consumer harm.  We fail to see any detrimental impact to the called party regardless of where the call actually originates.

In addition, modern telephony solutions make it simpler than ever for call originators to influence the routing and CLI of each individual call and with calls from mobiles as well as fixed line phones being broken out within an IP network it would be difficult to mandate that only calls that first originated on one device or another be treated in a specific way.

There are also a number of valid reasons why it could be appropriate to use a mobile CLI even though the call originated from a fixed terminal. For example, if local tradesman engaged the services of a virtual PA to contact their clients but wanted any return calls to go back to them directly on their mobile handset.

**Q5 – Utilisation targets for Geographic and Mobile Numbers**

Magrathea welcomes the setting of targets to improve conservation of number supplies, particularly noting that exceptions will be available on a case by case basis.

However, we would like to see more detailed definition of how utilisation will be monitored. For example, Magrathea hold number ranges for distribution to a number of other smaller providers. We provide real time tools to allow for the setup and management of numbers and prevent 'stock piling' of numbers by making it easy to hand them back and implementing charges if numbers aren't efficiently managed. However, we do not have insight into the use of each individual number and therefore it is possible that some numbers are unused for periods although we have committed them for use by a client. Any utilisation target would need to take this sub-allocation into account and not prevent us from acquiring more numbers to allocate to other clients just because call traffic isn't apparent on the full percentage of numbers.

Therefore 'utilisation' should include sub allocation as well as subscriber allocation.

If you have any queries with respect to this response, please do not hesitate to contact us.

Yours sincerely,

Tracey Wright
Magrathea Telecommunications Ltd

# 4: Three Ireland (Hutchison) Limited

# Numbering Conditions of Use and

# Application Process

# Response from Three

**Three.ie**

**Introduction**

Three is pleased to comment on ComReg's consultation on proposed revisions to the Numbering Conditions of Use and Application Process. We respond to each specific question in turn below.

*Q. 1 Do you agree with ComReg's proposed amendment to the condition on Number Portability? Please explain the basis for your response in full and provide any supporting information.*

Three does not have a strong opinion on this proposal. We note that block transfer is different than porting. We wonder if it is appropriate to port unassigned numbers, as porting should be customer led and no customer would have established a right to use for unassigned numbers, so could not request to port them. This could mean that a losing operator would need to assign additional numbers to a customer who is leaving them in order for the customer to be able to port out the numbers.

*Q. 2 Do you agree with ComReg's proposed amendment to the existing condition relating to CLI that Mobile Numbers are not used as the presentation or network CLI for calls that originate from a fixed terminal? Please explain the basis for your response in full and provide any supporting information.*

Three does not agree with the proposed modification to the CLI condition in part (a) ii. ComReg has not explained either a legal requirement or consumer benefit for this restriction. ECC Recommendation (11) 02 does not require any such differentiation for mobile numbering. Consumer harm/benefit also does not seem to explain why this change is being made. In many cases, it is cheaper for a caller to return a call to a mobile number than it is to a Geographic or Nomadic Number. ComReg's amendment would seem to prevent the use of a mobile number CLI except in cases where the inbound call will be answered on a mobile terminal. This rules out the use of a mobile CLI in most cases, and so prevents consumers from benefiting from the lower call prices to mobile numbers.

It should be noted that the use of a mobile CLI does not change the fact that the return call will always require to be terminated on a mobile network, and we would ask ComReg to clarify whether it would be permitted to use a mobile CLI in cases where a mobile terminal diverts inbound calls to a fixed terminal using call forwarding.

*Q. 3 Do you agree with ComReg's proposed definition of a mobile service? Please explain the basis for your response in full and provide any supporting information.*

Yes, we agree with the proposed definition.

*Q. 4 Do you agree with ComReg's proposal to introduce a new GA Condition in relation to undertakings providing access to numbers and services? Please explain the basis for your response in full and provide any supporting information.*

Yes, Three agrees with the proposal. We note that it is not considered to be feasible to provide international access to 1850 or 1890 number ranges.

*Q. 5 Do you agree with ComReg's proposed introduction of utilisation targets for undertakings when applying for additional Geographic and Mobile Numbers? Please explain the basis of your response in full and provide any supporting information.*

Yes, Three agrees with the utilisation targets proposed. We have some caveats in relation to how "total active numbers" is calculated though. For clarity, the explanation given in paragraph 37 seems to be different than the actual text and formula proposed in paragraph 39. We support the draft formula as in paragraph 39. In addition, ComReg should exclude numbers that are in quarantine from the proportion as they are also unavailable for assignment. The formula would then read:

$$\frac{Total\ numbers\ active\ and\ in\ use}{Total\ numbers\ unassigned - (Total\ ported\ out + Total\ quarantined\ numbers)}$$

In addition, there are many cases where it may not be appropriate to apply this formula, e.g. where no new assignments are being made from an existing allocated number range. In this case the remaining unassigned numbers in the range should not be counted.

*Q. 6 Do you agree with ComReg's proposal to introduce an audit form for undertakings to complete when applying for additional Geographic Numbers in an MNA? Please explain the basis for your response in full and provide any supporting information*

Yes, Three agrees with the proposal.

*Q. 7 Do you have any views on the future of the MNA concept? Please explain the basis of your response in full and provide any supporting information*

Three has no comment on this proposal.


*Q. 8 Do you have any views on any issues not discussed in this document and/or on issues which you feel are appropriate to the draft Numbering Conditions? Please explain the basis of your response in full and provide any supporting information.*

No further comments.

# 5: Verizon Ireland Limited

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# Verizon Response to ComReg's "Numbering Conditions of Use and Application Process" Consultation

## Introduction

1. Verizon Enterprise Solutions ("Verizon") welcomes the opportunity to respond to ComReg's "Numbering Conditions of Use and Application Process" consultation, reference 17/102 (the "Consultation").[1]

2. Verizon is the global IT solutions partner to business and government. As part of Verizon Communications – a company with nearly $131 billion in annual revenue – Verizon serves 98 per cent of the Fortune 500. Verizon caters to large and medium businesses and government agencies and is connecting systems, machines, ideas and people around the world for altogether better outcomes.

3. Please note the views expressed in this response are specific to the Irish market environment and regulatory regime and should not be taken as expressing Verizon's views in other jurisdictions where the regulatory and market environments could differ from that in Ireland.

## Response to consultation

4. Verizon understands the need to ensure that numbers are managed efficiently in Ireland. We note that ComReg proposes to use a calculation around the percentage of numbers allocated before assigning new number blocks to service providers.[2] We also note that ComReg says this rule will apply except in "exceptional cases" which will be judged on a "case by case basis".[3]

5. Verizon considers that one such exception would be in the case of service providers who serve large enterprise customers in Ireland, as Verizon does. Such customers typically require and demand large, consecutive number blocks for their use. It may be the case that a service provider does have a collection of numbers spread out across different number blocks which results in that provider being under the threshold limit, however they still require a new block to meet customer demand. Being able to obtain such free blocks is therefore key to ensuring that we can operate, meet customer demands, and ultimately remain competitive.

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[1] https://www.comreg.ie/publication-download/numbering-conditions-use-application-process-consultation, 7 December 2017.
[2] Section 2.4.1 of the Consultation.
[3] Paragraph 35 of the Consultation.

6. We therefore urge ComReg to be aware to the issue above in its number block allocation assessments and ensure that it takes account of these exceptional cases fairly and openly.


Verizon Enterprise Solutions
17 January 2018

# 6: Vodafone Ireland Limited

# Numbering Conditions of Use and Application Process

Vodafone Response to Consultation

**Comreg Document 17/102**

**17 January 2018**

# Vodafone welcomes ComReg's consultation   ComReg 17/102

Over the course of the last two years Vodafone have dedicated considerable resources to ensuring that the new fixed Number Porting system is operating effectively for all operators.

For Vodafone this has required the development of better internal number management systems, which are now in place, and also considerable labour input into data cleansing.    As a result, we believe we have improved the efficiency of our use of numbers.

In parallel many new converged fixed and mobile service are being implemented, driven by strong customer demand.

We ask ComReg to take these changes into account when implementing new Numbering Conditions of Use.

> Q. 1 Do you agree with ComReg's proposed amendment to the condition on Number Portability? Please explain the basis for your response in full and provide any supporting information.

Yes, we agree with the proposed amendment.

The new FNP system can effectively port blocks of numbers between operators.

## 2.1 Calling Line Identification

> Q. 2 Do you agree with ComReg's proposed amendment to the existing condition relating to CLI that Mobile Numbers are not used as the presentation or network CLI for calls that originate from a fixed terminal? Please explain the basis for your response in full and provide any supporting information.

We do not agree with this proposal. New converged fixed/mobile services are being introduced on an on-going bases and the CLI conditions should support these services.

These are very useful services for small companies and sole traders, allowing them to operate efficiently and among other advantages it facilitates them providing out of hours' services. In practice these users usually wish to present their fixed number when calling

There should be no issues with charges - if customers call back to a mobile number they are charged the appropriate mobile rate: this should be clear to them because the Mobile Numbers are distinct and well known to the public.

As long as the rate being charged to the customer is aligned with the number being called then there is no issue with public confusion.

We are not aware of any business attempting to increase the cost of customers calling them back.

*""mobile service" means a land based terrestrial publicly available mobile voice telephony, messaging and/or data service provided by means of a mobile network"*

> Q. 3 Do you agree with ComReg's proposed definition of a mobile service? Please explain the basis for your response in full and provide any supporting information.

Yes, we are happy with this definition

> Q. 4 Do you agree with ComReg's proposal to introduce a new GA Condition in relation to undertakings providing access to numbers and services? Please explain the basis for your response in full and provide any supporting information.

Yes, we agree with the proposed condition

Vodafone understand the need to use number efficiently and agree with ComReg monitoring utilization figures for numbers. We do believe however that it is best not to hard code the utilization target figures into the Number Conditions.

Particular circumstances may arise where large undertakings want a block allocation in a smaller rural area. We have found this case to arise where government services move to rural locations and seek to number blocks for new office locations. It would be better to handle these cases on a case by case basis.

This change is driven by a perceived shortage of number in some areas. Implementation of the new FNP number system has led to an industry-wide clean up of the number databases. This gives us much more accurate figures for number utilization.

These new number figures should be analysed, and time give for the new FNP process to bed in before a hard utilization target is introduced.

We suggest that this is not implemented now, but reviewed again at a later date.

Yes we are in agreement with the introduction on an audit form.

## 2.2 Minimum Numbering Areas (MNAs)

> **Q. 7** Do you have any views on the future of the MNA concept? Please explain the basis of your response in full and provide any supporting information.

In our view that MNA concept is now outdated.    Call tariffs which were once strongly proportional to distance are now equal over much larger geographic areas and heading towards countrywide equal charging.

The division of area codes into MNA areas brings a significant administrative burden, frequently delaying porting and reducing the efficiency of number utilization.

In this context we believe that it is now appropriate to move the Geographic Boundary for Geographic numbers up to the area code areas.

In the vast majority of cases this will still give customers adequate information on the location of calling or called numbers

This could be implemented on a phased basis – but there appears to be no good reason why is should not start now.