



Office of the Director of  
**Telecommunications  
Regulation**

**CONSULTATION PAPER**

## Numbering Conventions 2<sup>nd</sup> Revision

**Document No:** ODTR 02/82

**Date:** 30 September 2002

**Oifig an Stiúirthóra Rialála Teileachumarsáide**

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## 1 INTRODUCTION

The first version of the National Numbering Conventions, Document ODTR 00/10, was published in February 2000 and that was followed in December 2001 by version 2 (ODTR 01/94), which extended coverage into a number of new areas. These two documents have successfully fulfilled their role of providing a framework within which the national numbering resource is managed, bringing transparency and certainty to number holders and to those seeking access to networks and services.

Version 3 of the National Numbering Conventions, document ODTR 02/XX, is now published in draft form and it should be downloaded from the ODTR web site at [www.odtr.ie](http://www.odtr.ie) and read in parallel with this document. Alternatively, a copy may be requested by contacting Ms. Hilary Reynolds, ODTR (Phone +353 1 804 9620, e-mail [reynoldsh@odtr.ie](mailto:reynoldsh@odtr.ie)). **Tracked changes from Version 2 have been made visible using MS Word's Tracked Changes facility and respondents to this consultation are asked to comment specifically only on these highlighted changes.**

Version 3 introduces changes or new text in respect of the following topics, and also includes some more routine textual changes or improvements.

1. Opening of access to European Telephony Numbering Space (ETNS) numbers now specifically included (only implicit before);
2. Mailbox numbers introduced in the fixed network;
3. Text messaging short codes (new 5XXXX SMS codes framework);
4. National Signalling Point Codes (NSPCs) – these are codes used for network signaling within Ireland between operator's switches. The new framework expects the NRA to take control of these, whereas it has been less formal here up to now;
5. Exclusion of the use of over-length numbers (i.e. appending extra digits to the end of phone numbers);
6. Rewrite of the process for national number changes (Annex 6);
7. Acknowledgement of the imminence of the new legislative framework (*Note: the ODTR doesn't expect significant impact on the Conventions, in reality, and the present revision in any case includes some anticipatory adjustment, such as ETNS and NSPCs*);

Some of the above material has already been discussed with industry within the Numbering Advisory Panel – NAP – (i.e. items 1, 2, 5) or has already been consulted on (item 3); items 1, 4 & 7 are included because of the need to prepare for the forthcoming new legislative framework; and Item 6 is an improvement introduced by the ODTR, based on agreements made during long discussions in the NAP on how to handle the latest national number changes.

The Director now invites views from interested parties on these draft National Numbering Conventions - Version 3, using the questions which we pose in the next sections of this document. Comments should be submitted in writing in accordance with Section 3 below.

Following the consultation, the Director will issue a report on the main issues raised and, in the absence of major impediments, the definitive Version 3 of the Conventions will be published.

*Neither this consultation paper nor the draft Version 3 of the Conventions constitutes legal, commercial or technical advice. The Director is not bound by them. The consultation is without prejudice to the legal position of the Director or her rights and duties under legislation.*

## 2 CONSULTATION QUESTIONS

Respondents should indicate their agreement, or otherwise, with the following questions and include their reasons – especially in the case of disagreement.

### 2.1 OPENING OF ACCESS TO EUROPEAN TELEPHONY NUMBERING SPACE (ETNS)

National support for the ETNS, based on the code “3883”, has been an expectation of the European Community for some time and this matter has been discussed on several occasions within the NAP, with the ODTR pointing out these expectations to the industry. The new Universal Services Directive (2002/22/EC) now makes it a formal requirement from July 25, 2003 for Member States to ensure that all *undertakings*<sup>1</sup> handle all calls to the ETNS. As this obligation is without prejudice to the recovery by the *undertaking* of the cost of conveyance of such calls, the ODTR believes it makes sense to introduce coverage of the ETNS in the Conventions at this time.

**Q. 1. Do you agree with the new Convention 3.2-3 (Section 3.2), including the note, concerning access to the ETNS.**

### 2.2 MAILBOX NUMBERS IN THE FIXED NETWORK

The issue of introducing mailbox numbers into the fixed network has been discussed at length in the NAP and a positive ODTR decision on the matter has resulted in the commencement of formal number allocation to all geographic number holders (Note: this implies no obligation for any operator or SP to introduce fixed mailboxes). The conditions of allocation have also been decided, based on discussions in the NAP. The new text on this matter in Version 3 of the conventions now aims to ensure these procedures are covered within the framework of the Conventions and comments are invited on the manner in which this has been done.

**Q. 2. Do you agree with inclusion of the new text covering fixed network mailboxes (New sub-section in 11.2, addition to 11.10 (portability) and addition to A7.1 (service description), plus various incidental insertions, where relevant).**

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<sup>1</sup> In practice, this means all telecoms network and service providers

### 2.3 TEXT MESSAGING SHORT CODES (SMS)

The issue of introducing the new 5XXXX SMS framework was the subject of a public consultation, following which the ODTR decisions were presented in document ODTR 02/14. The first batch of 5XXXX codes has already been allocated and the framework is in operation. Draft text for the Numbering Conventions was agreed as an outcome of the consultation. This text has now been included in Draft Version 3.

Furthermore, some clarification of how charges specified for individual codes can be applied has been included in the Service Descriptions, A7.5.3, in the light of practical experience. The number of codes which can be allocated to any organisation has also been increased in the light of experience. *Note: It is not envisaged that the new quota on codes will be further relaxed in the future as it is considered ample to meet any SP's real needs, especially when the ability to use keywords is taken into account. SPs should therefore manage their usage with this in mind.*

**Q. 3. Do you agree that the new text covering text messaging short codes has been properly introduced to the Conventions document, as described in ODTR 02/14? (i.e. New sub-section in 11.3.8, and addition to A7.5.3 (service description), plus some incidental references, as relevant).**

**Q. 4. Do you agree that the last two paragraphs of A7.5.3 providing clarification on charging and on available allocations of codes are useful additions to remove ambiguity while relaxing allocation limits?**

### 2.4 NEW COVERAGE OF NATIONAL SIGNALLING POINT CODES (NSPCS)

It has not been ODTR policy up to now to intervene between operators in respect of codes for inter-network signalling, leaving the issue of NSPCs for operators to agree on a bilateral basis. This approach has been supported by industry in past consultations on the Numbering Conventions. However, Article 10 of the new Framework Directive (2002/21/EC) expects NRAs to take responsibility for ALL national numbering resources and it makes specific reference to NSPCs (in its preamble). It seems convenient to cover this expectation in the present revision of the Numbering Conventions.

**Q. 5. Do you agree with the new Conventions in Sections 11.9 and A1.9, concerning National Signalling Point Codes (NSPCs)?**

## 2.5 EXCLUSION OF OVER-LENGTH NUMBERS

The usage of over-length numbers (i.e. appending of extra non-allocated digits to actual phone numbers) has been discussed in the NAP and there was general agreement that this practice should not be allowed. While it may have some marketing attractions (e.g. to generate desirable words that correspond to the (extended) telephone number), it can result in problems for networks, directories and possibly for users.

**Q. 6. Do you agree with inclusion of the new Conventions 11.1-16 and 12.3, concerning the use of over-length numbers?**

## 2.6 REVISION OF ANNEX 6 (NUMBER CHANGES)

Extensive work carried out in the NAP to ensure a smooth change-over in the national geographic number changes now under way, has provided valuable lessons in how to approach number changes in general. Annex 6 has been rewritten to take this NAP experience fully into account

**Q. 7. Do you agree that the revised text of Annex 6 (Number change Process) is an improvement and should be retained?**

## 2.7 INCLUSION OF NUMBER ACTIVATION PROCESS

The NAP has developed a process that ensures all relevant entities are made aware of newly activated numbers or number ranges (i.e. numbers brought into operation). The NAP's recommendation is shown in the Appendix to this document. The Director invites views on whether the relevant parts should be included in the Numbering Conventions.

**Q. 8. Do you agree that inclusion of the number activation process shown in appendix is a useful addition to the Numbering Conventions, or should it be simply kept as a less formally recognised process?**

### 3 SUBMITTING COMMENTS

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

The consultation period will run from **30/09/2002** to **28/10/2002**]during which the Director welcomes written comments on any of the issues raised in this paper. Having analysed and considered the comments received, the ODTR will revise the National Numbering Conventions and publish a short report in **November 2002** on the consultation which will, *inter alia* summarise the responses to the consultation. In order to promote further openness and transparency the ODTR will publish the names of all respondents and make available for inspection responses to the consultation at her Offices.

The Director appreciates that some of the issues raised in this paper may require respondents to provide confidential information if their comments are to be meaningful. Respondents are requested to clearly identify such confidential material and if possible to include it in a separate annex to the response. Such information will be treated as strictly confidential.

All responses to this consultation should be clearly marked "Reference: Submission re ODTR **02/82**" and sent by post, facsimile or e-mail to:

FREEPOST

**Ms Hilary Reynolds**

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Ireland

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to arrive on or before **5:00 p.m. on 28 October 2002**.

Office of the Director of Telecommunications Regulation

30 September 2002.

## **APPENDIX: NAP Recommendation No. 6**

### **Recommended Notification Process for Number Activation**

The Numbering Advisory Panel

#### **having considered**

- That during the course of two consultations on the Numbering Conventions, support was expressed for the idea of developing an agreed industry process for notification by operators of the activation of number ranges and codes;
- that the Director referred this issue to the Numbering Advisory Panel, for its consideration;
- that the NAP having considered the matter, believes there is merit in having a standard format which all operators could use to notify each other of their activation of new number ranges or codes in order that those codes may be properly opened on all other relevant networks;

#### **and having taken into account**

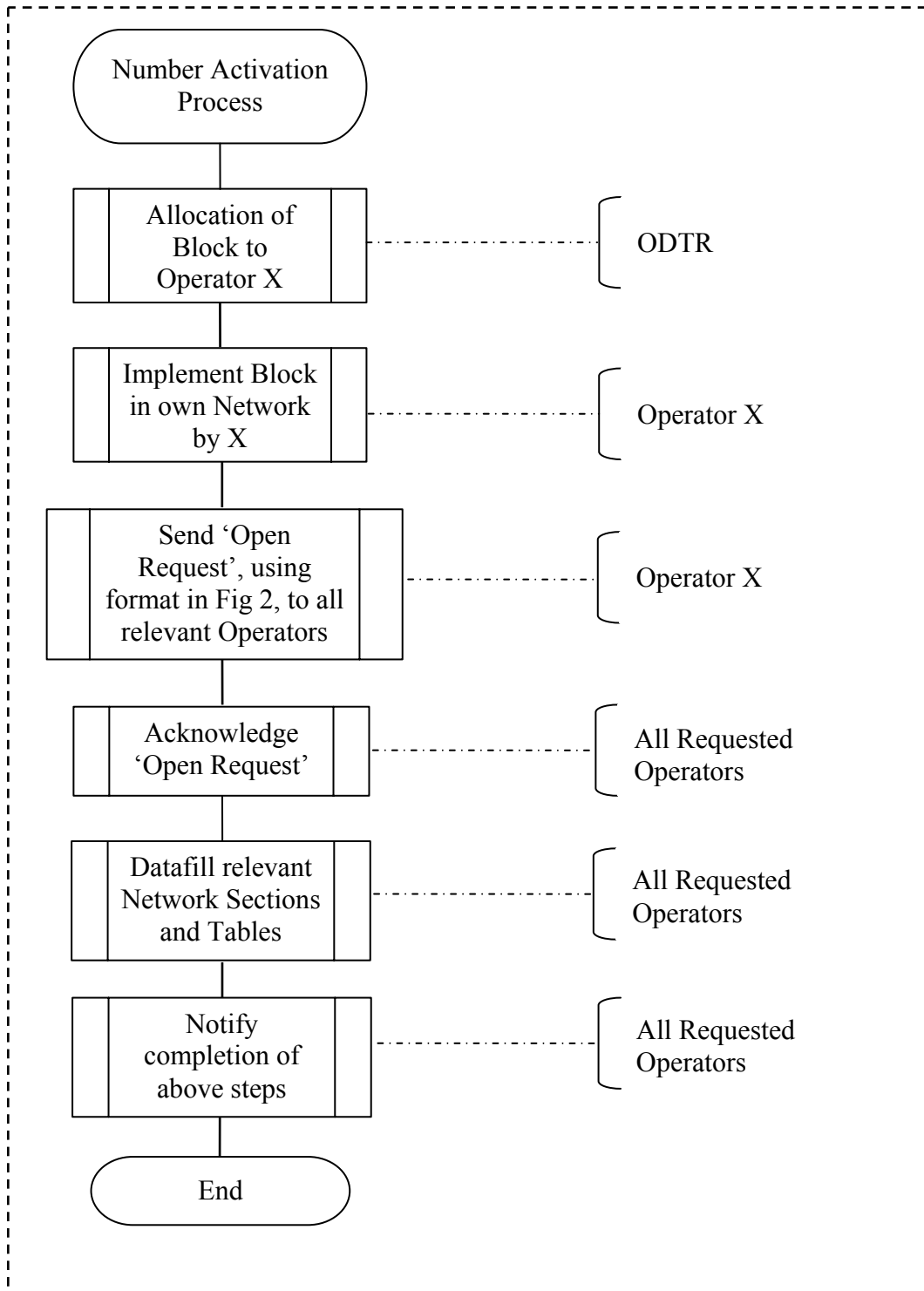
- that document NAP 15 explains the background to this issue;
- that while contractual arrangements must also be completed in respect of opening access, such matters are outside the scope of this Recommendation;

#### **recommends**

1. that the outline process shown in Figure 1 should be the norm for notification of number activation;
2. that the templates shown in Figure 2 should be used as the basis for implementing the notification;
3. that the normal communication mechanism for the notification shall be by email. However, letter post and/or fax are also considered to be acceptable;
4. that the ODTR Numbering Plan Management (NPM) should set up an email distribution list (an 'email exploder') holding the email addresses for the relevant contact points to be notified of number activation at each network operator. By sending an email to this list a requesting operator will be deemed to have reached the appropriate person in each organisation;
5. that each network operator should be informed of the list and that it shall then become the operator's responsibility to always ensure that the ODTR NPM is provided with the current email address of its contact point;
6. that the ODTR should consider including this process and its templates as a recommendation to operators in a new annex to the National Numbering Conventions.



**Figure 1: Recommended Number Activation Process**



## Figure 2: Activation Request Template, Page 1

### Operator Short Code, Geographic & Non-Geographic Number Range Activation Request Template

For the Attention of:

\_\_\_\_\_, \_\_\_\_\_, Numbering Manager.  
(Requested Operator Name) Dept/Section Name (if known)<sup>2</sup>

We hereby request you to open access to the numbering facilities listed in the attached page.

**Requesting Operator** : - "Name"

<b>Operator Name</b>	<i>Operator – X</i>
<b>Contact Details of Applicant</b>	<i>Numbering Manager Postal Address Phone Number Fax Number e-mail</i>
<b>Date of Request</b>	<i>June 1<sup>st</sup> 2002</i>
<b>Requested Completion Date</b>	<i>July 16<sup>th</sup> 2003</i>
<b>Number Designation</b>	<i>Geographic, Non-Geographic, Carrier Access, Mobile, DQ, etc...</i>
<b>Terminating POI(s) on Operator 's Network</b>	<i>MSC 1, Node #1 or Node #2 etc...</i>

**Requested Operator's Internal Use only: -**

<b>Ref. Number</b>	
<b>Request Status</b>	
<b>POI / Routes (of Requested Operator)</b>	
<b>Service Schedule</b>	

<sup>2</sup> e.g. "Carrier Services" in the case of *eircom*, .....

