



Office of the Director of
**Telecommunications
Regulation**

DECISION NOTICE

Numbering Conventions Revision Update to Version 2.0

Decision No: D18/01
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1. INTRODUCTION

The first version of the National Numbering Conventions, Document ODTR 00/10, was published in February 2000 and since then it has successfully fulfilled its role of providing a framework within which the national numbering resource could be managed. Version 2.0, was then published in draft form as document ODTR 01/40, along with an accompanying consultation document ODTR 01/39, which sought public comments on the proposed changes contained in draft version 2.0.

Version 1 of the Conventions was limited to coverage of the main types of numbers and codes that are of interest on a day-to-day basis, and with very limited coverage of mobile networks. Draft Version 2.0 revisited the original text wherever necessary, and also extended it to cover additional types of numbers/codes, including those only infrequently encountered. It also considerably improved mobile number coverage.

The response to this consultation was rather limited, which might be expected considering it was dealing with enhancement of an existing document, rather than breaking new ground. In all, there were eight responses, as follows:

Respondent	Category
Cable & Wireless Ltd.	Fixed Network Operator
Chorus Ltd.	Cable/Fixed Network Operator
<i>eircom</i>	Fixed Network Operator
Esat Digifone Ltd.	Mobile Network Operator
Esat Telecommunications Ltd.	Fixed Network Operator
Eircell Ltd.	Mobile Network Operator
Meteor Communications Ltd.	Mobile Network Operator
RegTel	Regulator of Premium Rate Services

In this document, each consultation question is presented in turn, followed by a short analysis of the responses received and this in turn is followed by the Director's position(s) on the matters addressed. Because of the detailed nature of the National Numbering Conventions, and the corresponding very detailed levels of answer received, it is not appropriate to address every minor improvement or editorial change resulting

from the consultation in this Decision Notice; However, all the main results are shown in the response analyses and/or in the Director's position sections.

Some decisions on particularly difficult or inconclusive issues involve referring the consulted issues, or matters springing therefrom, to the Director's Numbering Advisory Panel (NAP) for more detailed consideration; the ODTR has therefore initiated a set of meetings of that body to address these and wider issues. This revised Numbering Conventions document (i.e. Version 2.0) is published too soon to take account of most of the NAP's opinions but the latter will be considered separately by the Director and may be incorporated, without further consultation, into a new update of the Conventions during the first half of 2002.

For the convenience of readers, a version of the revised Numbering Conventions showing tracked changes from the original version, is available as a separate annex to this document¹.

¹ Note: Every attempt has been made to keep exact correspondence with the final Version 2 but readers should be aware that the comparison process in MS Word can result in widespread changes to automatic numbering of headings and bullets and it is possible that some of these have remained undetected or will re-appear. A physical check against the final published document is recommended, if in doubt.

2. CONSULTATION QUESTIONS

Q1 Introduction

The consultation sought agreement to certain definitions that were changed or included following comments received by the ODTR:

Q1	In Section 2, a change is made to the definitions of ‘Activated’ and ‘PSTN’ and a new definition is inserted for ‘Mobile Network’. Do you agree with these definitions?
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Analysis of Responses

Respondents generally agreed with the new definitions although one respondent felt the definition of PSTN might cause confusion. Other minor improvements to definitions were also proposed by respondents.

Director’s Position

The Director accepts the new definitions, while also including some minor improvements suggested by respondents.

Q2 Introduction

When number changes occur, the customer’s calling line identification (CLI) isn’t necessarily changed at the same time as the new number is opened and/or when the customer begins using the number (normally during a parallel running period). A proposed change to Convention 3.2-1 was intended to address this.

A further change, to Convention 3.2-6 addressed the number change process in general.

Q2	In Section 3.2, a second sentence is added to Convention 3.2-1 (immediately before the note) and Convention 3.2-6(ii) is rewritten, including reference to a new Annex 6. Do you agree with these changes (including Annex 6)?
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Analysis of Responses

Most respondents considered the proposals to be useful and supported them.

Three respondents referred specifically to the reference to CLI in Convention 3.2-1, with one feeling it added no new value, one objecting to any requirement on operators to provide advice on impacts on CLI of number changes, and one supporting the change. The latter argued that customers should be made aware of such impacts to CLI, (particularly in respect of the timing of any parallel running period and final cut-off date) so they have sufficient time to make amendments to equipment.

Various comments were made by respondents in respect of the detailed process outlined in Annex 6, showing where some improvements could be made. However, while there was strong majority support for the annex some comments noted the range of different number change (and code change) situations that can occur, making it difficult to cover all of these in the annex. . One respondent objected to the inclusion of the annex on the basis that “The National numbering conventions is not the place to specify a “standard” process.”

Director’s Position

The Director is pleased to note that there is very strong support for the proposed changes apart from those affecting CLI. She also welcomes the various suggestions for improvements and some changes will accordingly be made in the words of Annex 6. The note to Convention 3.2-6 will be changed to show that the status of Annex 6 is that of a reference process (i.e. generic guidelines), as the Director agrees that a fixed mandatory procedure covering all number changes would not be possible.

Q3 Introduction

Some textual improvements and updates are addressed in Question 3.

Q3	<p>In Section 11.1, Convention 11.1-4 is updated to take account of the introduction of Number Portability, 11.1-11 is revised to remove potential ambiguity.</p> <p><i>Note: No fundamental changes to the principles of the existing conventions are intended by any changes to section 11 of the Conventions.</i></p> <p>Do you agree with these changes?</p>
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Analysis of Responses

Respondents supported the proposed changes. One respondent strongly rejected the references to ‘MNA’ in the Conventions, in-line with its response to the separate Numbering Review consultation 00/97. It felt the governance of geographic numbers should not be predicated on MNAs.

Director’s Position

In view of the support received, the changes will be introduced. The issue of MNAs was dealt with in the Numbering Review consultation and the Numbering Conventions introduce no changes in respect of MNAs.

Q4 Introduction

Service codes of the type 190X have been widely used by networks to provide fast access to their customer services and these have normally been accessible free of charge to callers even from outside the network concerned. However, they have not been covered by the Numbering Conventions up to now. The following question addresses this point.

Q4	Section 11.3.1 has been changed by adding a new requirement covering usage of 190X customer service short codes. Do you agree with this change?
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Analysis of Responses

The majority of responses favoured the introduction of the new Convention 11.3.1-2, specifying free (to the caller) 190X Customer-service calls, and all recognised the value of the proposal. However, one respondent felt “it must be drafted to take account of changes that may occur at the interconnect level, which will not support a free of charge retail rate for calls to 190x”, while a second noted that “*eircom* recently added calls to third party customer service codes to their transit pricing list”. On this basis, the latter was not prepared to support the Convention (at least in respect of non-SMP operators).

Director’s Position

The Director has decided that the new convention 11.3.1-2 should be introduced and that calls to 190X numbers should be always free of charge to the calling customer. Calls from other networks to 190X numbers should also be supported (also free of charge to the caller) and therefore the new convention 11.3.1-2 will cover this. Both of these provisions (i.e. free access and access from other networks) are in the interests of all and particularly of the consumer. The opening of access to such ‘foreign’ 190X numbers should normally be carried out as soon as notification is provided of the activation of this number (maximum one per network). The Director is of the opinion that inter-operator charging arrangements for 190X numbers, can be based on either of the following options:

- Operators can mutually agree to deliver these calls on a reciprocal free of charge basis (paying any relevant transit charges, if appropriate);
- Operators can agree on reciprocal charges to be applied to 190X calls from one of their networks to the other.

Q5 Introduction

The first version of the Numbering Conventions was extremely limited in its coverage of mobile numbering. Q5 proposes to include enhancements that bring coverage of this important area in line with that for fixed networks.

Q5	A new section 11.6 “Mobile Numbers and Mobile Codes Usage” is inserted ² , thus introducing better coverage of mobile networks. A corresponding annex A1.3 covering eligibility criteria is also introduced. Do you agree with (the principle of) <u>introduction</u> of these sections?
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Analysis of Responses

The inclusion of the mobile numbering sections was supported.

Director’s Position

The new sections 11.6 and A1.3 will be retained.

Q6 Introduction

Q6 complements Q5, by asking for comments on the actual content of the new mobile numbering text.

Q6	Do you agree with the <u>contents</u> of new sections 11.6 and A1.3 relating to mobile numbering?
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Analysis of Responses

Only the three mobile operators responded to this question, two in clear support. The third mobile operator expressed concern that the term “in certain circumstances” is used without further clarification, in relation to when a MNC may be issued to the holder of a General License. It wished for the circumstances to be made explicit.

Director’s Position

The content of the new sections 11.6 and A1.3 is accepted. Concerning MNCs, the Director has previously indicated that potential Mobile Virtual Network Operators could qualify for these, and several such codes have been issued on a provisional basis. No other special circumstances are considered likely at this time, although situations might arise in the future where MNCs could be used for mobility purposes on fixed networks. The Director reserves her right to react flexibly in the interests of competition in the marketplace and while she has applied relatively strict criteria in respect of MNC

² It should be understood that extension of the Numbering Conventions in these areas does not alter any numbering responsibilities or principles of administration – the effect is rather to make existing approaches more explicit and to centre them in a single easily accessed document.

eligibility, taking into account the current availability of such codes, this could change in the future. In any case, she considers it would not be in the interests of light-handed regulation, nor in the interests of the mobile industry to attempt to prescribe all possible MNC eligibility criteria in the conventions.

Q7 Introduction

Apart from general mobile numbering, SMS is a unique service worthy of special consideration. Q7 opens up the possibility of introducing Numbering Conventions for SMS.

Q7	There is no coverage of the strong growth area of Short Message Service (SMS) in the mobile numbering sections. Are you aware of any specific SMS issues that should be covered in the National Numbering Conventions?
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Analysis of Responses

One operator felt the Conventions should include a provision allowing initiators of unsolicited ‘spam’ SMS messages to be penalised (e.g. by withdrawal of service). Another operator proposed that codes should be provided for premium SMS messages, on the grounds that existing Premium Rate codes are unsuitable, both from number length and tariffing transparency perspectives. Another respondent noted that serious problems have arisen in the UK in respect of ‘reverse SMS’ premium services and that the UK equivalent of RegTel has been asked to act as ‘watchdog’ there.

Director’s Position

Although the Director is in principle supportive of efforts to minimise unsolicited spam SMS, she does not consider the Numbering Conventions an appropriate place for this, as spam involves widespread broadcasting and is inherently unrelated to specific numbers. She understands that the Wireless Marketing Association³ is developing a voluntary Code of Practice (CoP) and this CoP may be a good mechanism for blocking spam. The ODTR encourages initiatives of this type and expects that the mobile operators and the independent service providers will participate, to make it an effective instrument that benefits the industry and the consumer.

The matter of premium SMS and the possible use of new codes for these raises many issues and the Director has decided to progress the matter by meeting with industry players and with RegTel. Initial contacts have already been made in that respect and a document published⁴. Informed decisions will then be arrived at on the best route

³ The WMA is an industry association composed of mobile operators and service providers.

⁴ ODTR 01/91: A proposed framework for value-added text messaging (SMS) services.

forward. The Numbering Conventions will subsequently be amended to take account of work in this area, if appropriate.

Q8 Introduction

DNICs have not been covered in the Numbering Conventions thus far; Q8 proposes that DNICs should be covered in future.

Q8	<p>A new section 11.7 “Usage Conditions for Data Network Identification Codes (DNICs)” is inserted², thus introducing new coverage of data networks. Although there is currently little activity in this area, which may seem like old technology, it was felt appropriate to include it for the purpose of completeness.</p> <p>Do you agree with (the principle of) <u>introduction</u> of this section and do you have any comments on the future of traditional data networks addressed by use of DNICs?</p>
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Analysis of Responses

This proposal was fully supported.

Director’s Position

The proposed DNIC amendments will be included in the Conventions.

Q9 Introduction

Q9 is the complementary question to Q8, addressing whether the proposed content of the new Numbering Conventions for DNICs is acceptable.

Q9	Do you agree with the <u>content</u> of new section 11.7 covering DNICs?
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Analysis of Responses

This proposal was fully supported, apart from a reservation by one respondent about the warning time of 6 months in convention 11.7-5; A warning of 9-12 months would be preferred.

Director’s Position

The proposed DNIC wording will be included in the Conventions. Draft new Convention 11.7-5 will be amended to say “up to 12 months warning wherever possible, but at least 6 months”

Q10 Introduction

ISPCs have not been covered in the Numbering Conventions thus far; Q10 proposes that ISPCs should be covered in future.

Q10	A new section 11.8 “Usage Conditions for International Signalling Point Codes (ISPCs)” is inserted ² , thus introducing new coverage of international signalling points. A corresponding annex A1.8 ⁵ covering eligibility criteria is also introduced. Do you agree with (the principle of) <u>introduction</u> of these sections?
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Analysis of Responses

There was complete support for introduction of the new section covering ISPCs.

Director’s Position

The new section on ISPCs will be introduced into the Conventions.

Q11 Introduction

Q11 is the complementary question to Q10, addressing whether the proposed content of the new Numbering Conventions for ISPCs is reasonable and adequate.

Q11	Do you agree with the <u>content</u> of new sections 11.8 and A1.7 ⁵ covering ISPCs?
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Analysis of Responses

There was complete support for the proposed content of the new section covering ISPCs.

Director’s Position

The wording of the new section on ISPCs will be as proposed in the consultation document.

Q12 Introduction

The successful introduction in Ireland of Number Portability (NP) means changes were needed to the Numbering Conventions and proposals for these were provided. A related question raised in the consultation was whether effects on CLI of NP should be covered

Q12	Section 11.9 (former Section 11.6) covering Number Portability is totally revised and extended to take account of current conditions and of mobile networks. Do you agree with the content of new section 11.9? Are there any Calling Line Identification (CLI) issues that should be covered, specifically in relation to Number Portability?
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⁵ The new section should have been identified as A1.8 in ODTR 01/39, as noted by some respondents.

Analysis of Responses

Both incumbent mobile operators objected to the inclusion of requirements for FMNP as they considered this to be premature, while the new mobile operator supported the whole text. However, the reference to FMNP is only an informative note, based on Decision Notice D1/01, so no requirements are introduced by it.

No CLI issues were identified in relation to Number Portability.

Fixed network operators proposed useful improvements to the wording of Convention 11.9-3, which describes when transfer of blocks may replace porting. One additional suggestion was for transfer to be allowed at operators request, transparently to the customer. However, the ODTR believes that customer request is more appropriate and would always be forthcoming when such a transfer is in the customer's interest.

One also proposed that the ODTR should specify that the industry porting processes must be followed. The Director supports and will support the principle of adherence to agreed industry procedures but believes that a note is a more appropriate way of including this in the Numbering Conventions than a mandatory requirement.

Director's Position

Section 11.9 is accepted. A new note will be added to Convention 11.9-1 to the effect that network operators will be expected to follow agreed industry processes in implementing number portability.

Alternative wording, as follows, will be introduced in respect of Convention 11.9-3, in line with the industry process: *"Where a fixed line customer, being the sole resident of any complete 1,000 or 10,000 number block and using 25% or more of that block of already allocated numbers requests this, the block may be re-allocated to a different operator (i.e. rather than ported);"*

Q13 Introduction

Changes in the UK numbering plan for Northern Ireland imply certain consequential changes should be carried out here. The next question addresses the implied changes for the Numbering Conventions.

Q13	Section 13.2, covering calls to Northern Ireland, is revised to bring it up to date. Do you agree with these changes?
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Analysis of Responses

Only one change was suggested to the proposed amendments - at editorial-level.

Director's Position

The revisions are accepted, with one editorial improvement in Convention 13.2.2.

Q14 Introduction

The existing conventions of Section 15 have become redundant, with the passage of time. The next question addresses convention changes to deal with this.

Q14	Section 15, covering revision of the Conventions, is revised by deleting Convention 15-1, which is now redundant, and by insertion of "typically" in Convention 15-4 to allow for exceptional short-term situations. Do you agree with these changes?
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Analysis of Responses

While there was general support for the proposals, one operator felt it should be possible to amend the Conventions more easily than is indicated in Section 15 and that in any case an annual review of the Numbering Conventions should be specified. Another felt a minimum period of notice of one month should be given to comply with Convention changes (Convention 15-4).

Director's Position

The Director accepts that an annual review of the Conventions should be the norm, but she reserves the right to extend this period when material changes are not required. Decisions on this timing will therefore be made dependent on the circumstances and need for change prevailing at the time.

She also accepts that Convention 15-2 should be altered to allow intermediate changes to be made in a simpler way where desirable, and that a minimum 1-month notice period should be included in Convention 15-4.

Q15 Introduction

The successful implementation of CPS in Ireland means that the sections covering indirect access (previously covering Carrier Access and Carrier Selection) must be extended. Q15 addresses this.

Q15	Section A1.4 (former Section A1.3) covering Carrier Access/Carrier Selection is amended to also now include CPS ² . Do you agree with this change?
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Analysis of Responses

There was strong support for the inclusion of CPS in section A1.4.

Director's Position

The proposed amendments will be introduced.

Q16 Introduction

The successful implementation of Number Portability in Ireland means that a new section covering routing prefixes seemed desirable. Q16 addresses this.

Q16	A new Section A1.5 is introduced, covering Number Portability routing prefixes. Do you agree with this change?
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Analysis of Responses

There was general support for the new section although two respondents identified small but important textual errors in Convention A1.5-2; these will be corrected.

Director's Position

The new section on NP routing prefixes will be included in the Conventions.

Q17 Introduction

The publication of document ODTR 01/12 brought with it the opening of two new potential mechanisms for Internet access, using new codes 1892 and 1893. Q17 deals with the coverage of these in the Numbering Conventions.

Q17	Section A1.7 (former Section A1.5) covering Internet Access is extended to also now support PAYG and Flat Rate Internet access mechanisms (as introduced by ODTR 01/12) ² . Do you agree with this change?
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Analysis of Responses

Two operators disagreed with the proposals, while all others supported them.

The first operator considered it was premature to introduce coverage of the two new Internet access codes as interconnect arrangements between operators are not yet in place, while the second felt it was restrictive of ODTR to tie numbers to tariffing models.

Director's Position

The principle of introducing the new codes *per se* is already established (ODTR 01/12), so it is appropriate – as noted by most respondents - that eligibility criteria for their allocation should be included in the Numbering Conventions. The Director considers these are additional models with new access codes, providing extra options for operators, without placing any new restrictions in respect of existing mechanisms. Coverage of eligibility for allocation of the codes need not await commercial interconnect agreements on their use. The Director encourages operators to open services on these codes as soon as possible, in order to offer greater choice to consumers.

Q18 Introduction

The next question seeks views on the introduction of Annex A1, new Section A1.8, covering eligibility criteria for ISPCs.

Q18	Section A1.8 is introduced to provide coverage of ISPCs. Do you agree with this change?
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Analysis of Responses

There was complete agreement in respect of this question.

Director's Position

The new section will be included in the Conventions.

Q19 Introduction

Q19 introduces two new conventions to avoid a possible situation where reservations could be continuously renewed and never taken up.

Q19	Annex 2 is amended by inclusion of new conventions A2.1-8 and A2.2-8, to explicitly cover failure to take up reservations. Do you agree with this change?
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Analysis of Responses

All respondents except one accepted the new conventions, with the latter reserving its judgement.

Director's Position

The new conventions will be introduced.

Q20 Introduction

The proposed introduction of new conventions for DNICs and ISPCs requires some consequent changes in Annex 3 (Information from Applicants). Q20 seeks views on the new text proposed for this purpose.

Q20	Annex 3 existing text is slightly re-ordered and extensions included in order to cover information needed in respect of DNICs and ISPCs. Do you agree with these changes?
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Analysis of Responses

All respondents supported the proposals.

Director's Position

The proposed changes to Annex 3 will be implemented.

Q21 Introduction

Additional examples are introduced in Annex 5, to clarify new text introduced in Version 2 of the Numbering Conventions (as described earlier) and, in addition, Figure 2 is updated to take account of changes that have occurred since the first version was published. Q21 invites comments on these changes.

Q21	Annex 5 is extended by updating of Figure 2 and by inclusion of some additional examples. Do you agree with these changes?
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Analysis of Responses

All respondents supported the changes, with two respondents noting an error in one example. This error will be corrected.

Director's Position

The changes will be implemented.

Q22 Introduction

The inclusion of service descriptions for various number types was a major extension of draft Version 2 of the Numbering Conventions. Q22 sought views on whether this innovation was welcomed.

Q22	A new annex 7 is included to provide a set of service descriptions which may act as guidelines for users. The information presented there was already implicit in the first version of the Numbering Conventions but the ODTR now feels the purpose of the Conventions is better met by making them explicit. Do you agree with (the principle of) this <u>addition</u> ?
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Analysis of Responses

All respondents supported the principle of including the new Annex 7, containing service descriptions. One respondent proposed that the outcome of the parallel-running consultation on the National Numbering Scheme should be taken into account in coming to any conclusions. Another noted that some descriptions referred to numbers and others to services and this should be corrected.

Director's Position

In view of the wide support, the new Annex 7 containing service descriptions will be introduced. The terminology relating services to numbers will be tightened up.

Q23 Introduction

Q23 is the complementary question to Q22, addressing whether the proposed content of the new Service descriptions is reasonable and adequate.

Q23	Do you agree with the <u>content</u> of the new Annex 7 in respect of service definitions?
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Analysis of Responses

Respondents asked for mobile numbering to be covered (i.e. in addition to geographic and non-geographic numbers), and for examples to be included with the service definitions, so as to provide absolute clarity of ODTR intentions. One respondent, while supporting the annex, felt it confuses numbers and services and therefore needs further discussion. *Note: This respondent also submitted comments on Personal Numbers, which are addressed at Question 34, below.*

Director's Position

The new Annex will be extended to include coverage of mobile numbering, as suggested. Examples of specific services will not be added for most cases at this stage as the range of possible situations to be covered would make this practically unmanageable. However, simple examples will be provided for the cases of Personal Numbering Services and Universal Access Services, where the distinctions between the two are difficult to define.

Q24 Introduction

Some responses to the consultation on the first version of the National Numbering Conventions proposed that new numbering conventions should be included inter alia for: National Signalling Point Codes (NSPC), Issuer Identifier Numbers (IIN), Network Service Access Points (NSAP) and ATM End System Addresses (AESA). Although the ODTR did not believe it would be useful to include conventions for those codes at this time (for reasons given in the consultation), it invited opinions before finally deciding on this.

Q24	Do you agree with omitting the codes NSPC, IIN, NSAP and AESA from the Conventions? If you do, please comment. If not, please say which you feel should be included and on what basis.
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Analysis of Responses

Of the five respondents that answered this question, four were in favour of continuing to omit the specified codes. One was strongly in favour of regulation of NSPCs by the ODTR as it considers these codes are (de facto) currently being issued and managed by

eircom – to the disadvantage of OLOs. The same respondent would like the ODTR to also regulate IINs, in respect of mobile networks and SIM cards.

Director’s Position

As the responses generally agree with the Director’s own current view, no conventions will be issued in respect of NSPC, IIN, NSAP and AESA at this time. However, considering the importance of some of these codes, especially NSPCs, this position will be kept under review and conventions will be drawn up if the need for this is perceived.

In respect of NSPCs, the Director does not accept that *eircom* has control of these codes, which until now have been agreed on a bilateral basis between pairs of operators concerned. She has directed that the ODTR should take control of this numbering resource, going forward and therefore it is intended that the recovery of NSPCs should take place during the next 3-4 months following publication of this Decision Notice. They will be covered in future versions of the Numbering Conventions.

The Director is not aware of any difficulties in the marketplace in respect of SIM cards and will only intervene if such situations are brought to her attention.

Q25 Introduction

ATM and Frame Relay are well established technologies but no numbering conventions exist to cover them. Although the ODTR is not aware of the need for such conventions, it was felt that an opportunity should be provided to interested parties to express their opinions on this.

Q25	Do you consider anything else is needed in the Conventions in respect of ATM or Frame Relay? If so, please comment.
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Analysis of Responses

No gaps were identified in respect of ATM or Frame Relay.

Q26 Introduction

It was proposed in the consultation that new or improved Numbering Conventions should be provided in respect of ‘bursty traffic’, ‘frequent misdialling’, ‘malicious calls’ and ‘short codes’. These terms are used in existing conventions.

Q26	Do you feel that any of these definitions (or others in the Conventions) need improvement or addition (e.g. the definition of bursty traffic, which originated from the Task Force on Numbering and was a best collective view in 1998, is rather specific? Is there a better – but still usable - view today)? If so please provide your proposal for the definition(s) of interest to you.
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Analysis of Responses

Most respondents either felt the existing definitions are adequate or else didn't respond. Two suggested that further definition in respect of codes would be helpful and one of these made some further useful suggestions (e.g. clarification of the terms "retail" and "concerned operator").

Director's Position

The Director agrees that some improvements should be made in explaining codes, a new definition should be added for retail charge and some other detailed wording improvements can be implemented. She notes that while the National Numbering Conventions are intended to be a resource governing the management of numbers and the purposes for which numbers are used, the supporting definitions are included to clarify usage within that document only and are not intended as general reference terminology.

Q27 Introduction

Convention 3.2-3 obliges operators with Significant Market Power (SMP) in access networks to open access to all relevant numbers. Convention 3.2-4 however only requires non-SMP operators to open access to such numbers subject to commercial negotiations between operators.

Q27	<p>i. Do you consider that the rules on opening access in Convention 3.2-3 for SMP operators should also now be applied to non-SMP operators?</p> <p>ii. If so, do you consider there is a need for a delay before implementing this change to allow the completion of any outstanding commercial negotiations?</p> <p>Please explain your views on this.</p>
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Analysis of Responses

Apart from *eircom*, the overwhelming response was that non-SMP operators should not be required to open access to all relevant numbers, regardless of the status of commercial negotiations. This would mean leaving Convention 3.2-4 (covering non-SMP operators) unchanged.

One respondent argued that even SMP operators should not be obliged to open access, so as to avoid situations in which the Numbering Conventions could be used as a tool to avoid completing commercial negotiations. However, that respondent also noted that the Notification Working Group is currently addressing this issue.

Director's Position

While the Director takes note of the response she is also very strongly supportive of the any-to-any interconnection principle. However, Convention 3.2-4 (covering non-SMP

operators) will not be changed until this issue is addressed within the Transit Notification Working Group in the near future. It is however likely that the numbering conventions will need to be amended to reflect non-SMP operator's obligations. No change will be made in respect of SMP operators (Convention 3.2.3, which applies to both fixed and mobile operators).

Q28 Introduction

It has been proposed that it should be possible to devise an industry reference recorded announcement that would be suitable for use, with only minor adjustments, in most cases of number change. This would bring benefits of harmonisation and customer familiarity, while still leaving operators free to adopt alternative announcements when the reference announcement is not relevant.

Q28	Do you agree with the concept of a (voluntary) industry reference recorded announcement for changed numbers? If yes, you may wish to suggest a suitable set of words.
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Analysis of Responses

The weight of response to this question was marginally in favour of a generic announcement, with one additional respondent favouring only guidelines for such an announcement while leaving the precise words up to the operator concerned. One operator provided suitable words, based on recent UK experience.

Director's Position

The Director accepts that providing guidelines for recorded announcements, while leaving it up to each operator to accept, modify or reject those words in accordance with its own context is the most appropriate choice. A suggested outline wording, suitable for easy adaptation to most number-change situations, will therefore be added to Annex 6.

Q29 Introduction

The ODTR provides notification of primary number allocation to the recipient of the allocation and it is then the responsibility of that party to notify and negotiate with all Irish and overseas authorities concerning the implementation/activation of those allocations. Section 7 of the Numbering Conventions describes this. It might be helpful to operators if an agreed long-term process for this notification of number activation to all relevant parties could be agreed.

Q29	Do you agree that an industry-agreed process for notification by operators of number activation (i.e. bringing into service, following allocation) would be useful? If so, can you provide a draft of such a process for discussion?
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Analysis of Responses

All respondents except one to this question agreed that an industry process for notification by operators of number activation would be beneficial. The need for involvement by the ODTR was mentioned by some and the involvement of *eircom* was also considered important. One respondent felt *eircom* and other operators should be tasked with developing the process while another felt this should be done in the NAP.

A list of points suitable for a position paper was provided by one respondent.

Director's Position

In view of the support for work on a notification process, the ODTR will prepare a position paper to be submitted to the NAP for its consideration. After the NAP reports she will decide whether additions should be made to the Numbering Conventions in respect of notification of number activations.

Q30 Introduction

Section 8.2 of the Conventions describes user's rights in the case where numbers might receive frequent misdialed calls or where (many) malicious calls are received. It is desirable to establish a recognised procedure for operators to follow in those situations.

Q30	Can you propose a set of operator procedures for handling the cases of: <ol style="list-style-type: none"> i. Numbers vulnerable to frequent misdialed calls? And/or ii Numbers receiving malicious calls?
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Analysis of Responses

Three respondents to the question described their existing procedures, in general terms, while the two other respondents stated operator procedures for handling misdialing complaints or malicious calls should be left to operators to decide. The procedures described involved changing telephone numbers, calling the Gardai (or advising the customer to do so) in the event of malicious calls and – in the case of one operator – monitoring the line.

Director's Position

No respondent specifically supported changes to the conventions in respect of misdialed numbers and malicious calls, while two specifically rejected this. The Director has decided to make no changes in those respects.

Q31 Introduction

Requests have been made in the past to expand Convention's section 11.2.2 (covering secondary allocation to end users), which is rather cursory at present when compared with section 11.2.1 that covers primary allocation.

Q31	<p>Do you agree that the existing Section 11.2.2 is adequate?</p> <p>If you feel Section 11.2.2 needs to be expanded, can you propose appropriate draft conventions for that section, for consideration?</p>
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Analysis of Responses

While no respondent felt section 11.2.2 needed expansion, one respondent considered it might be useful to restate that the usage of numbers should be consistent with the definition of the number ranges concerned. However, the existing short text already requires this by requiring consistency with the conventions.

Director's Position

No changes are needed to Section 11.2.2

Q32 Introduction

Decision Notice D1/00 noted that views were split on whether sanctions should be specified for dealing with bursty traffic offenders. Those in favour foresaw the abused numbers being withdrawn from the end user to whom they are allocated, possibly after several warnings. Those against sanctions didn't wish other operators (i.e. originating or transit operator) to be obliged to implement sanctions imposed by the terminating operator (except as agreed in any interconnection agreement). The Numbering Conventions already provide a certain degree of support for such sanctions, where necessary and are without prejudice to a user's right of appeal to the Director in the event of unfair treatment.

Q32	<p>In the light of ongoing experience, do you agree that the current level of support for sanctions in the Conventions [against bursty traffic offenders] provides a reasonable balance that allows operators to protect their networks while not being over-bearing on responsible traffic generators?</p> <p>If not, please give your reasons and outline the steps you feel should be applied.</p> <p>If yes, please comment.</p>
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Analysis of Responses

A complete spectrum of views was presented in response to this question by the four respondents who answered it. One felt the bursty traffic conventions have the right balance at present, one felt they should go much further (e.g. requiring prior notification of bursty events) and one felt that deviation from the conventions should be handled by

Network Management. The latter also pointed out that Internet traffic may have consequences in this area, requiring further consideration. The fourth respondent felt the issue needs to be addressed by the NAP.

Director's Position

The Director notes that despite the diversity in responses, there is some real concern about bursty traffic. She also accepts that the changes to dominant traffic characteristics caused by the Internet may have consequences that should be explored. She has therefore decided to make no changes to the Numbering Conventions on bursty traffic at present but to refer this issue to the NAP for its consideration.

Q33 Introduction

In the consultation, it was proposed to amend convention 11.3.5 on personal numbers, which was developed in 1998 by the Task Force on Numbering, but Decision Notice D1/00 noted there were some reservations that it may be unnecessarily restrictive. A sample new convention was provided.

The basic premise of the existing Convention (which remains unchanged in draft Version 2) is that the caller should not be expected to pay extra for a service of which he/she may be totally unaware, and which is generally only of benefit to the called party. The opposing viewpoint is that this service should be left to market forces to develop and it is for each customer to distinguish the charges for calls he/she makes.

Q33	Do you agree the Convention on Personal Numbers (old version or proposed slightly amended version now under consultation) is adequate for the time being? If not, please give your views on amendment of the convention.
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Analysis of Responses

Two respondents supported the proposed slightly amended text, while one operator took the view that the conventions should be amended to allow greater flexibility in charging for Personal Number Services. A further respondent emphasised the importance of having absolute clarity about usage of personal numbering services.

Director's Position

It is of concern that only four respondents dealt with this (and the next) question(s). As Personal Numbering Services appear to be growing and have generated some controversy, this is disappointing.

The Director has decided that the present text of Section 11.3.5 in Draft Version 2 of the Conventions will be retained for the present. In addition, in line with early NAP discussions, she has decided that words to exclude revenue sharing and premium rate information content should be added.

Q34 Introduction

Q34 was a complementary question to Q33, dealing with the content of any possible new convention on Personal Numbering.

Q34	<p>Do you consider it necessary or desirable to adopt a new Numbering Convention on Personal Numbers, similar in principle to the existing one apart from:</p> <ul style="list-style-type: none"> i Charging principles, where the caller could be subject to higher charges than the existing Convention permits? ii Number range used? A new number might be allocated to ensure that any problems and complaints which might be generated by the new service, would not adversely affect the existing 0700 service or Personal Number Services in general. <p>Please give your views on these matters, including:</p> <p>In respect of (i), what protections against unanticipated excess charges – if any – should be provided for the caller?</p> <p>In respect of (ii), is a closely adjacent number like 0701 acceptable or should a well-separated number range (079X, 0709, 0810) be used to emphasise the intended separation from 0700?</p>
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Analysis of Responses

While one respondent would like to see more flexibility in charging for Personal Number services, three responses were against introducing new conventions to facilitate this. Most respondents concentrated on issues of charging for personal number services, though suggested number ranges proposed by ODTR for a new service (i.e. with different charging rules) were also rejected. The following key points were variously made:

- There should be more flexibility in charging for Personal Number services;
- Where the caller is subject to higher charges the number should be in the 15xx premium service range, to avoid callers being duped into paying more for calls than they have to;
- Adopting a modified convention would lead to customer and market place confusion, leading to a loss in demand for the product;
- Personal numbers should not be used to generate revenue for the called party;
- Resources from the national scheme should only be set aside, or numbering changes initiated when there is customer demand for a new service;

- Any new [Personal Number] Service should use a number well separated from the 0700 code;
- Guidelines should be provided to operators on what to print in retail price sheets for calls to these numbers.

Director's Position

The Director notes that most respondents (albeit from a small response group) reject the fairly specific ODTR proposal on cost grounds and in respect of the proposed number ranges. She also takes account of and agrees with the consultation responses that absolute clarity is needed in respect of Personal Number Services, which have drawn some interest in the marketplace. She has decided not to introduce new Personal Numbering conventions at this time but has referred the issue of personal numbers to the NAP, to see if industry agreement can be reached on new recommendations. The NAP shall consider and report to her on:

- whether amendments are needed in the existing Convention to ensure absolute clarity as to its intentions, going forward;
- whether industry agreement can be reached on alternative models for Personal Numbering Services;
- which is the most appropriate number or number range to be used for access, if needed by such amended or additional service(s);
- ensuring appropriate distinctions exist between Personal Number Services and Premium Rate Services, in respect of numbering ranges used and numbering conventions applied to those ranges;
- Consider guidelines for SPs on what should be printed in retail price sheets for calls to these numbers; *(Note: this and the previous point should be tackled from the perspective of ensuring customer awareness and the corresponding maintenance of trust in numbers and particularly sensitive number ranges).*

Q35 Introduction

Decision Notice D1/00 identified some confusion about the usage of Network Unique Short Codes (NUSCs), which had not long been introduced at that time. It was therefore appropriate for the consultation to consider whether improvements are needed to the current conventions (in Section 11.3.7).

Q35	In Section 11.3.7 a new note is added to the introductory text and Convention 11.3.7-6 is slightly amended. Furthermore, a new convention 11.3.7-7 is added to clarify that network operators (NOs) may not establish advantageous positions vis-à-vis non-NOs who are ineligible to receive NUSCs, by using their NUSCs for purposes unrelated to network support. Do you agree with these changes?
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Analysis of Responses

Five of the seven respondents who answered this question supported the proposals, while one mobile and one fixed operator disagreed. The latter dissenting response – and to an extent the former – would be satisfied if the definition of ‘network support’ was not drawn too tightly. The same mobile operator argued that the NUSCs were not originally restricted to network support purposes and argued strongly for more such codes to be made available as all its existing NUSCs are already in use.

Director’s Position

The Director accepts that the original specification of NUSCs and the purposes for which they can be used was limited but considers it was always understood that they were strictly for network-related purposes. While their use to-date has not given rise to serious concern, she nevertheless believes that there is a real risk of disputes and/or of unfair competitive advantage unless network orientation is at the core of their usage, going forward. The Director is concerned to ensure that service providers who are not network operators are not disadvantaged in offering non-network services (e.g. games) through not having equivalent access to short codes for similar services. She has therefore decided

- that the existing textual changes to Conventions 11.3.7 are acceptable;
- to make available a new range of 5-digit short codes⁶ to be used for high-demand network-based purposes (e.g. SMS games, ringtones and downloads), while specifically limiting the acceptable uses of existing NUSC ranges to their original network-oriented functions. Unlike NUSCs, the new range will be also available on equal terms (via individual network operators) to service providers who are not network operators;
- to include service descriptions for NUSCs – to now be called Network-Use Short Codes and (later) for the new range – to be called Text messaging Short Codes (TMSCs) - in Section 7 of the Conventions;
- to require a migration of those existing network-use short codes that do not fit the relevant service description, across to the new still-to-be-defined TMSC range, over a maximum period of 12 months from publication of this Decision Notice.

⁶ The framework under which this new range would operate is currently under consultation – see ODTR 01/91.

Q36 Introduction

Q36 was a complementary question to Q35, designed to check whether respondents felt more was needed in respect of NUSC coverage.

Q36	Do you agree that the NUSC conventions in section 11.3.7 are sufficient? If not, please provide your suggested changes or additions.
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Analysis of Responses

There were no proposals for new conventions in respect of NUSCs. In respect of common use of specific NUSCs, there was a mixed reaction. Some respondents pointed out the benefits of customer recognition of codes, while others felt that any attempt at harmonisation could be a hindrance to innovation.

Director's Position

The Director has decided to take no initiatives in respect of harmonising NUSCs. She nevertheless strongly encourages operators to use the same codes if opening their own version of services already offered on other networks, thus adding value for all by enhancing consumer recognition of the code.

Q37 Introduction

Q37 sought to establish whether it is possible to use common NUSCs for common purposes, even while maintaining the network independence implied in the NUSC title. Any progress in this area could benefit all concerned.

Q37	Do you agree it is desirable to investigate what services are used under each NUSC by different operators and to develop industry recommendations for the functions to be provided by at least some of these codes? If yes, can you suggest which codes might be suitable for common usage? If no, please indicate your reasons for disagreement.
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Analysis of Responses

There was little support for this proposal, with one operator suggesting that only playback should be harmonised, whereas other services should be placed on a non-NUSC short code if they are suitable for harmonisation. One of those supporting the proposal suggested categorising short codes further, to help customers remember them.

Director's Position

The Director agrees with the main thrust of the responses and feels it is best to allow each operator to decide its own selection of NUSCs to services, although she does

encourage voluntary harmonisation of selected code by new entrant services with those already in the marketplace. She sees value in categorising short codes further, as suggested by one respondent, and will do this by including a service definition section for short codes in the Numbering Conventions.

Q38 Introduction

The current Conventions define criteria only for primary allocation of geographic and non-geographic numbers as it wasn't felt necessary to specifically list any criteria for secondary allocation (i.e. allocation to end-users) - the default situation is that eligibility is presumed unless reasons for refusal are known. Furthermore, end users who have been refused allocation may use the conventions of Section 4.3 to appeal this decision to the Director. Nevertheless, the Director sought opinions on whether this situation is adequate.

Q38	Do you agree that it is unnecessary to include specific eligibility criteria for secondary allocation in Annex 1 of the Conventions? If you disagree, do you have proposals for suitable Conventions?
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Analysis of Responses

All respondents were agreed that specific eligibility criteria for secondary allocation was not needed in Annex 1.

Director's Position

No change will be made to Annex 1 in respect of secondary allocation.

Q39 Introduction

Although the ODTR doesn't favour the inclusion of CLI in the National Numbering Conventions, in principle, CLI has close connections with numbering. Accordingly, views were sought on whether any aspects of CLI should be covered.

Q39	Do you consider there are specific CLI issues which should be covered in the National Numbering Conventions? If so please identify them, with reasons. Please also indicate the form of words you consider appropriate, if any?
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Analysis of Responses

All respondents were agreed that CLI issues should not be covered in the Numbering Conventions. The appropriate places are Data Protection documents, Codes of Practice, Number Portability docs, Interconnection documents etc.

Director's Position

The Director agrees that the Numbering Conventions should not attempt to cover CLI issues.

Q40 Introduction

The next question was intended to provide an opportunity for input on any additional matters respondents might wish to raise.

Q40	Do you wish to propose conventions or comment on any aspects of the Conventions which you feel are inadequately (or not at all) addressed, or new issues which may be appropriate to the conventions?
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Analysis of Responses

Four respondents took the opportunity to make additional comments about the conventions, going into detail in some cases. Many of these points provided useful input, and are supported by the Director (see below).

Director's Position

The Director has decided on the following dispositions concerning various points made by the respondents:

- Convention 5.1-6 should be amended to show that allocation to the reservation holder, if requested, will normally follow reservation of a number, code or range, subject to compliance with Annex 1.
- The numbering plan database on the ODTR web site (addressed in Convention 14) will have minor improvements made in its user interface (e.g. instructions and use of wild-cards);
- Convention A1.7-4 should be deleted to avoid confusion, as its content is already adequately covered by Conventions 11.1-5, 11.1-6 and 11.1-14;
- The question of introducing numbering arrangements (e.g. an access code) for dialable fixed network mailboxes will be referred to the NAP for its consideration;
- The issue of access obligations to the European Telephony Numbering Space (ETNS – code 388 3) will be referred to the NAP for its consideration – in the context *inter alia* of Convention 3.2-2 and its footnote;
- Convention 5.2.2(ii) will be amended to include the expression “to meet specific customer demands” after the words “existing services”;
- Convention 11.10.3-1 will be amended to say recovered numbers **will** be placed in quarantine, rather than saying the assignee has a right to this.

3. Director's decision on publication

Having considered responses to the questions posed in this consultation and arrived at individual positions thereon, the Director has decided:

- To immediately publish version 2 of the National Numbering Conventions, amended in line with the positions she has adopted and with certain minor editorial changes;
 - To await receipt of viewpoints from her Numbering Advisory Panel on certain more difficult issues, as described earlier and then, subject to her own agreement with the views expressed, to publish a further update during 2002 that takes account of those viewpoints as well as any additional decisions that may have issued in the meantime.
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