



Commission for  
**Communications Regulation**

## Response to Consultation

### **Numbering Conventions V4 & New Number Applications Process**

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## 1 Introduction

The National Numbering Conventions is the basic rule book that describes how ComReg fulfils its legislated responsibilities to manage the national numbering resource effectively and efficiently. It also sets out the rights and obligations of the other main stakeholders in respect of numbers and codes.

The first version of the National Numbering Conventions, Document ODTR 00/10, was published in February 2000 and that was followed in December 2001 and December 2002 by versions 2 and 3, respectively (i.e. ODTR 01/94; ComReg 02/107). These in turn each extended coverage into a number of new areas. A draft Version 4, was published on 3 December 2003 for public consultation, along with consultation document ComReg 03/142. While this continued the coverage of some new areas, its main function was to adapt the Conventions to the requirements of the new legislative framework.

In addition to the revised Conventions, a new document describing ComReg's number applications processes was also published in draft form and consultation document ComReg 03/142 invited comments on both of these. ComReg's aim was to enhance the transparency of its applications process by pulling together and harmonising the main number applications procedures which have been built up over the last 6 years or so and which have until now been described in a range of documents.

This report now describes the outcome of the consultation and the changes that will be made to the Numbering Conventions and/or to the Applications Process document as a result.

<b>Respondent</b>	<b>Category</b>
<i>eircom</i>	Fixed net operator
Esat BT	Fixed net operator
MCI	Fixed net operator
O2	Mobile Operator
Vodafone	Mobile Operator

It is clear from the section references quoted in responses that many respondents, understandably, based their reviews of the revised Conventions totally or primarily on the marked-up version of the document, without reference to the 'clean' non-tracked copy. While this is valid in most cases, it has resulted in some points being made that refer to failures of MS Word's document comparison and tracking capabilities<sup>1</sup> rather than actual errors/duplications etc. in text of the Conventions. In this document, ComReg has adjusted section references, where necessary, to suit their true values and ignored any references to deleted text.

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<sup>1</sup> ComReg drew attention to this problem in note 2 of the introduction to ComReg 03/142 and provided a clean version without tracking (and without the problems present). Despite the tracking system failures, ComReg believes the advantages to readers of such a densely-packed document of being able to concentrate on changed text outweigh the limitations of the tracking system.

Under the new 2003 legislative framework, ComReg continues to hold sole responsibility for management of all telecommunications numbering resources and it strives to carry out this function in an open, transparent and non-discriminatory manner. Publication of the National Numbering Conventions and of ComReg's application processes forms part of this effort.

## 2 Consultation Issues

### 2.1 Revision 4.0 of the Numbering Conventions

#### 2.1.1 Background

It was proposed to publish the revised version of the National Numbering Conventions before the end of February 2004, subject to any feedback received from the consultation. A draft of the complete Conventions document, showing the proposed changes, was published along with the consultation document and respondents were invited to review this and provide their comments to ComReg. A subsequent two week extension of the deadline for responses caused a corresponding delay in analysis of public responses and publication of the response to consultation document.

<p><b>Q. 1. Question No. 1 Do you agree with the content of the draft V4.0 of the National Numbering Conventions, as attached?</b></p>
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#### 2.1.2 Support from Respondents for Publication of the Revised Conventions

Respondents either specifically expressed support for the new conventions or else didn't directly answer this question but limited themselves to commenting on the text and coverage.

One respondent felt that the review of the Conventions should have been more wide-ranging as text that was originally valid has become less so as industry has evolved and new regulations are in place and this respondent accordingly made some more general observations, which have been considered by ComReg. In particular, this respondent wished to see the Conventions split by removal of text relating to calling rates into a separate more frequently updated document. In the respondent's view this would allow more rapid change in commercial arrangements while keeping the bulk of the Conventions relatively stable.

This respondent also wished for the present rather general references to European Standards and ITU-T Recommendations to be supplemented by more specific inclusion of the latest information from these Standards and Recommendations to make the Conventions as effective as possible. Pro-active contribution from Ireland to the Standards process was also urged in order to promote the interests of Irish industry.

#### 2.1.3 Commission's Position

In view of the fact that no respondent objected to the revision, ComReg will proceed with updating the Conventions. The detailed comments received will be taken into account in this process, as discussed below.

ComReg believes that the proposal to remove all commercial references from the Conventions to another document, although well-intentioned, is misplaced, as such references have been limited to necessary conditions of use for certain number types. In general they consist only of **upper limits** on the **retail** prices that can be charged for calls to specific numbers, in the interests of transparency for the

consumer; these values are therefore intimately associated with the actual number itself. The **actual** retail prices that industry charges should not automatically gravitate to these upper limits and they and their associated settlement rates should be negotiated between the various parties in accordance with their usual procedures. For the avoidance of doubt: by setting upper price-bands in the Numbering Conventions as a condition of use for numbers, ComReg is merely stating that if industry wishes to use any specific one of those numbers for some service then the retail price which it charges the customer for the service should not exceed the set limit. This provides certainty for the consumer. ComReg encourages the use of lower prices in practice and in general there is adequate scope in the values set in the Conventions for retail prices to be much lower.

Concerning timescales, ComReg is not aware of cases where retail levels set in the Numbering Conventions have resulted in commercial delays to industry; such delays generally occur in negotiation of **actual** retail rates and the corresponding settlement rates between the various parties concerned. In any case, ComReg is empowered to make decisions about matters covered by existing conventions at any appropriate time using its normal decision-making processes – such changes would then be adopted into the Numbering Conventions at the next ‘routine’ update. This means that the periodicity of Numbering Conventions updates should have no practical impact on the speed at which commercial arrangements are undertaken.

ComReg does not wish to burden the already quite complex Numbering Conventions by following suggestions to insert additional material derived from Standards or Recommendations, or by adding abbreviations or reference annexes, unless these add real value for users. However, it will consider individual enhancements meeting that criterion at any time if specific suggestions are made by industry (e.g. through the NAP).

**Q. 2. If you have specific comments on the revised text of draft V4.0 of the National Numbering Conventions, or [have noted] omissions in it please include these with your response.**

#### *2.1.4 Specific Views of Respondents on the Revised Numbering Conventions*

Respondents submitted a wide range of inputs, the main ones of which can be summarised as follows:

- **Quarantine period:** it would help customers and operators if the exception from the 1 year norm for mobile pre-paid customers referred to in the Convention 11.6.3-4 footnote could be made more explicit;
- **Mobile Network Codes:** Convention A1.3-3 on MNCs, in which the possibility of allocation to “very large-scale mobility service of some specific type” is foreseen is too open.  
Also, the text of Section A1.3 relating to MVNOs is too restrictive.  
Furthermore, there should be automatic reference to the Numbering Advisory Panel (NAP) of applications for MNCs from fixed network operators;

- **Routing Prefixes:** The text of Convention 11.3.9-3 is incorrect in respect of mobile networks;
- **Premium Rate Services:** ComReg has previously accepted (in operator's responses to the ComReg 03/27 consultation) that quoted retail rates – now updated in Convention A6.3.3 - apply to fixed networks only. Accordingly, a note to that effect should be included in the Conventions.  
Also, as conventions for '1559' adult numbers are included under the text messaging section 11.3.3 and also under the PRS section 11.2.8, it should be deleted from the former.  
Also, calls to PRS are actually charged per second and the existing references to "per-minute" charged calls may be confusing. (This operator also noted that the 1520 access code has until now been used for per-call services, rather than per-minute, as described in the Conventions – have asked him to clarify);
- **SMS Tables:** improved wording suggested for Table A6.4, relating to SMS charges;
- **Caller Location:** as this is already mentioned in legislation it should not be also included in Convention 3.2.1-3;
- **Reservation of Numbers:** the 3-month limit for reservation of numbers (i.e. without re-applying) can easily be exceeded when introducing new products and a longer reservation period should be permitted for this situation.  
Also, Section 5.2 does not describe the rules under which ComReg might make reservations of numbers for end-users nor how operators could become aware of the rights of use that exist over the numbers concerned;
- **Authorisation/Authorised Persons:** The distinction between "All" authorised persons in Section 3.2.1 and other authorised persons in Sections 3.2.2 and 3.2.3 was queried, as was the mechanism to be used for suspension of Authorisation or withdrawal of rights of use for number (i.e. pursuant to Convention 3.2.1-4). In the latter context, how would the associated customer issues be handled?
- **Recovery of Numbers:** Timescales are given in Section 4.5 for activating numbering resources that are allocated, failing which recovery of the resource may take place. How would ComReg identify such resources and effect the recovery?
- **Number Change Process:** An additional stage is proposed to the table of Annex 5, in the form of a cross-check of potential new numbers against a table of known risk-prone numbers [e.g. such as advertised UK numbers];
- **Number Trading:** There is an apparent contradiction in responsibility for dealing with number trading abuses at secondary level between Convention 11.1-9 [primary-holder responsibility] and Convention 3.2.1-4 [ComReg responsibility];
- **Access to Non-geographic Numbers:** The new Conventions 11.2.4-2 (Freephone), 11.2.5-3 (Shared cost), 11.2.8-5 (PRS) and 11.3-3 (Short codes) on access from EU countries to Irish non-geographic numbers deal with areas

that should be left to operators to negotiate commercially. Furthermore, a potential clash with Dublin numbers could occur;

- **TETRA:** The references to TETRA numbering in Convention 11.3.5-6 should be amended in the light of the recent (draft) ITU-T Recommendation E.218;
- **Interests of Users:** Convention 3.1-7, which states that ComReg should *inter alia* promote the interests of users in pursuance of its obligations under the Act of 2002, should be removed;
- **New coverage:** Coverage of ENUM should be included in the Conventions as soon as appropriate;
- **Number Activation:** Section 7 should be amended to remove the obligation on Operators to communicate with overseas authorities, where appropriate, regarding the activation of newly allocated numbers. The ITU's fortnightly-published bulletin should be used and (from Ireland) only ComReg can get information inserted in this;
- **MNA Removal:** The ending of the MNA concept should be considered, as a means of avoiding number changes;
- **Fixed Mailboxes:** Footnote 13, on call forwarding from fixed mailboxes, contradicts Convention 11.2.2-6 and/or shows the fixed mailbox service is unnecessary;
- **Personal Numbers:** An error concerning personal numbering was identified in the document "Irish Telephony Numbering Scheme – Status Report", which was not being consulted on;
- **Website:** Numbering Conventions and the Numbering Applications document should be placed in the Numbering section of ComReg's web site;
- **Textual matters:** Various changes were suggested by respondents, including corrections, typos, enhancements etc.  
*Note: where minor changes enhance or improve the Conventions ComReg will adopt them without specific comment below.*  
In addition, the inclusion of a references section and an abbreviations section in the Conventions were proposed.

#### 2.1.5 Commission's Position

The various points made by respondents in Section 2.1.4 above, are addressed below:

- **Quarantine period:** ComReg agrees that the footnote to Convention 11.6.3-4 should mention that it was found necessary<sup>2</sup> to recycle pre-paid mobile numbers after a quarantine period of only six months (c.f. the normal period of

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<sup>2</sup> Decision Notice D1/01 refers.



twelve months) to make more efficient use of the (at that time) very limited resource.;

- **Mobile Network Codes:** ComReg agrees that Convention A1.3-3 on MNCs should be made more specific by altering the text “very large-scale mobility service of some specific type” to read “large-scale fixed network mobile-type service that requires the use of an MNC for its operation”. The present wording, which was intended to allow for future fixed network developments that may not be clearly foreseen at this stage, is agreed to be too vague. ComReg does not agree to include a requirement in Convention A1.3-5 obliging a reference to be made to the NAP in respect of all applications from fixed network operators for MNCs; references to the NAP might be made in practice in questionable or uncertain cases, however.

ComReg notes the inputs received from respondents in respect of text in Section A1.3 relating to requirements for MVNOs. This is an area where ComReg receives strongly divergent views from operators and potential MVNOs and where practical decisions have been arrived at after considerable deliberation over time. Various categories of MVNO can be defined in the marketplace but for the purposes of managing scarce numbering resources (i.e. MNCs and mobile numbers), ComReg has set out a set of requirements that identify an appropriate standard of MVNO. ComReg does not accept that its definition is a restriction on the marketplace operation of other players who remain free to also title themselves as MVNO, even though they do not qualify for allocation of an MNC. ComReg will apply comparable criteria to fixed network operators seeking MNCs;

- **Routing Prefixes:** ComReg agrees that the text of Convention 11.3.8-3 referring to routing prefixes is incorrect in respect of mobile networks. It will be amended to make clear that it only refers to fixed networks;
- **Premium Rate Services:** ComReg accepts the point made by a mobile operator that it has been common practice for mobile networks to charge more for calls to Premium Rate Numbers than the price charged by fixed operators. However, ComReg does not necessarily consider this is appropriate and - as indicated in sections 6.2.2 and 8.1 of ComReg 03/54 – it has various other concerns about calls from mobiles to Premium Rate Numbers. As the Conventions are limited to setting the upper limits of retail price-bands for calls to PRS and as these are already higher than the (recently increased) actual price-points in use on fixed networks it is not considered to be appropriate to now introduce a new note in the conventions supporting even higher mobile calls.

ComReg notes a respondent’s observation that conventions for ‘1559’ adult numbers are included under the text messaging section 11.3.3 and also under the PRS section 11.2.8. However, this is not a mistake as the former relates to regular use of 1559, typically for voice services, whereas the latter recognises its (potential) use as a textable number, as an alternative to 59XXX numbers.

ComReg will clarify the text on timed PRS calls in the conventions to avoid any implication that these may not be billed on a per-second basis.

As the new Premium Rate structure is due to come into force within only one and a half months following publication of the revised Numbering Conventions (following some delays), ComReg will include this structure within the conventions. This was the PRS structure included in the consultation document. To cover the interim period, ComReg will add a footnote to the Section A6.3 showing that the old structure continues in operation during that time;

- **SMS Tables:** ComReg accepts that the changes suggested by a mobile respondent to Table A6.4 concerning SMS messaging charges are an improvement and will, with some minor wording variations, adopt them in the conventions;
- **Caller Location:** ComReg notes the position of one respondent that it is questionable whether it is appropriate to include the reference to caller location in Convention 3.2.1-3 and agrees this is a borderline case. However, as the provision relates directly to the emergency service access numbers ‘112’ and ‘999’ and has important implications for operators it is not considered inappropriate to include it, notwithstanding that it is already an obligation under legislation. *Note: In that respect it is no different from other numbering issues referred to directly in legislation, such as ETNS, the “00” international access code, and indeed the 112/999 codes themselves;*
- **Reservation of Numbers:** ComReg has considered the request to extend the 3-month limit for reservation of numbers in the case where new products are being introduced to the market and agrees that despite the renewable nature of reservations the lengthy nature of the new product process justifies a longer allowance. The words of Convention 5.1-8 will be amended accordingly.

ComReg considers that Section 5.2 adequately describes the foreseen situations under which ComReg might itself make reservations of numbers for end-users. As reservation only means holding these numbers available in the database for later allocation to the end-user concerned (i.e. not in use), the question of operator’s knowledge of the rights of use does not arise. However, ComReg agrees with one operator that the linking in Convention 8.1-4 of reservations to rights of use is misleading and therefore the words “or reserved” will be deleted from that section;

- **Authorisation/Authorised Persons:** ComReg accepts that to aid clarity it should add text to sections 3.2.2 and 3.2.3 concerning the responsibilities of certain Authorised Persons, making it clear that Section 3.2.1 also applies to them.

Concerning Convention 3.2.1-4 and possible suspension of Authorisation or withdrawal of rights of use for numbers following non-compliance, ComReg does not feel that a process can easily be described showing how this might be carried out in practice nor how the associated customer issues would be handled. Each such situation will need to be treated individually, taking account of all the circumstances of the case at that time;

- **Recovery of Numbers:** ComReg does not believe it is necessary or helpful to insert text in the Conventions describing how recovery of unused numbering resources would be achieved, nor how such unused resources are to be identified. It is not proposed to initiate an active discovery programme and positive recovery action generally only occurs when resources in short supply are needed by others and/or when ComReg becomes aware – for whatever reason – of such unused resources.

A related issue is the correction of numbering breaches; ComReg notes the good advice of one respondent that these can sometimes have serious implications and therefore enforcement is important. ComReg takes enforcement seriously and seeks corrective action when breaches are discovered, though the limited resources available as well as ComReg's objective of light regulation, mean this is largely a reactive rather than proactive process;

- **Number Change Process:** ComReg believes there is value in one respondent's suggested creation of a list of potentially clashing numbers against which a cross-check should be carried out before implementing number changes, and with a step added to Annex 5 requiring such a cross check to be carried out. However, as Annex 5 represents a process that can only be modified in the course of industry discussions, ComReg calls upon the NAP to make any appropriate recommendations for change;
- **Number Trading:** ComReg accepts that the apparent contradiction between Convention 11.1-9 and Convention 3.2.1-4 in respect of responsibility for dealing with number trading abuses at secondary level [i.e. primary-holder responsibility v ComReg responsibility] should be addressed. In reality, this is a dual responsibility in which the primary number-holder should be the one to address the abuse by its own customer, whereas the authorisation to instigate the redress should be provided by ComReg, using its powers. The text correction will be achieved by insertion of the words "following consultation with ComReg and with ComReg's agreement" in Convention 11.1-9;
- **Access to Non-geographic Numbers:** ComReg has taken note of comments by two respondents concerning amendments to Conventions 11.2.4-2 (Freephone), 11.2.5-3 (Shared cost), 11.2.8-5 (PRS) and 11.3-3 (Short codes) dealing with access from EU countries to Irish non-geographic numbers. These amendments, which sprang from the obligation in Article 28<sup>3</sup> of the Universal Service Directive to ensure access from other EU countries to Irish non geographic numbers, sought to relate the Irish element of charges made to EU callers to similar rates charged to Irish callers. ComReg accepts that the Numbering Conventions is not the best place for changes that directly impact wholesale rates and charges made to foreign operators, and these Conventions will accordingly be removed. In order to move towards meeting Article 28, a new Convention 3.2.2-4, addressing only the (obligatory) access requirement, will be added. This addition may trigger new questions concerning levels of technical and economic feasibility that are not defined in either the EU

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<sup>3</sup> Implemented in Ireland by Universal Service Regulation 24

Directives or the new framework regulations and ComReg recommends that the NAP should take this matter under consideration;

- **TETRA:** Although ComReg felt there was no obvious disagreement between Convention 11.3.5-6 and the draft ITU-T recommendation E.218, it has decided that it is now appropriate to delete that convention entirely in the absence of any current need to cover TETRA in the Conventions;
- **Interests of Users:** Convention 3.1-7 states that ComReg should promote the interests of users in pursuance of its obligations under the Act of 2002 by, *inter alia*, promoting the provision of clear information, in particular requiring transparency of tariffs and conditions for using services. ComReg considers that the fulfilment of this obligation (which replaces similar if less specific earlier legislation) forms an important backdrop to the conditions of use applied to many number types. Accordingly, it is relevant and appropriate for it to be included in the Numbering Conventions;
- **New coverage:** ComReg accepts the view of one respondent that the ENUM product should be covered by the Numbering Conventions as soon as appropriate, in a way that respects service and PSTN call quality and with minimum interruption to operators. In order to avoid misunderstandings or disputes by ENUM users or potential number-squatters, ComReg has introduced a preliminary section covering rights of use of E.164 numbers for ENUM purposes.
- **Website:** ComReg agrees with the suggestion that the Numbering Conventions and the Numbering Applications document should be made available on the Numbering section of ComReg's web site. Furthermore, other numbering documents should also be made available there. This work will be undertaken as soon as possible;
- **Number Activation:** ComReg does not agree with the contention that Section 7 paragraph 2 should be amended to remove the obligation on Operators to communicate with overseas authorities, in appropriate cases, regarding the activation of newly allocated numbers. However, ComReg agrees it is appropriate to insert the term "or operators" after "authorities" (i.e. in respect of the destination of communications). ComReg already provides input to the ITU's fortnightly-published bulletin about number changes (and hence complete categories of numbers for which access should be opened), and in many cases this may be enough to ensure access is provided. However, ComReg does not have necessarily have direct information on block-by-block activations of allocated numbers and problems in individual cases where some foreign operator(s) fail to open access should continue to be resolved directly by the Irish operator concerned;
- **MNA Removal:** ComReg notes the proposal of one respondent to remove the MNA concept, thereby reducing the need – in some cases – for numbering changes. ComReg will indeed consider this option, where relevant, in respect of areas where number changes are otherwise threatened, as was done in the recent 2003 series of number changes (e.g. for the Dublin area). However, it does not propose to discard MNAs as an underlying basis of numbering as an

outcome of this limited consultation on the Numbering Conventions; any organisation wishing for such a result would need to make a separate case to ComReg, justifying it;

- **Fixed Mailboxes:** ComReg does not agree with the contention of one respondent that footnote 13, which indicates that call forwarding from fixed mailboxes is acceptable, contradicts Convention 11.2.2-6 and/or makes the fixed mailbox service unnecessary;
- **Personal Numbers:** One respondent noted an error concerning personal numbering in the document “Irish Telephony Numbering Scheme – Status Report” (crossed-over descriptions between 0700 numbers and 0707 numbers). ComReg will correct this error;
- **Clarifications:** In response to uncertainty from one respondent concerning Convention 11.1-2 (conditions of use), ComReg wishes to clarify that it views the designation of specific number types for defined purposes and (if relevant) against specific retail tariffs, as offering a degree of certainty for users and for competing industry players. This aids transparency for all and helps to build consumer confidence in the relevant services, as required by Convention 3.1-7.

In answer to another request for clarification, ComReg notes that the Numbering Conventions have traditionally covered most numbering resources for which ComReg has responsibility and for which management rules should be published. This goes beyond the management of E.164 and E.212 resources and includes non-diallable codes or numbers (e.g. routing prefixes). It is ComReg’s aim, in the interests of transparency, to include coverage of all numbering resources in use, unless confidentiality or security issues arise or unless some specific resource is at or approaching obsolescence and the effort of producing conventions for it is not justified;

- **Textual matters:** ComReg will adopt various textual changes or text enhancements suggested by respondents wherever appropriate. In cases where the comments are either incorrect or partially correct they will be adopted selectively, while in cases where they may be pedantically correct but would involve undue elaboration without adding real value ComReg will avoid extending the already bulky Conventions document.

The text concerning geographic numbers and geographic areas in Sections 11.1, 11.2.1 and 11.3.4 will be re-organised more appropriately between Section 11.1 and 11.2.1.

ComReg does not accept that the phrase “right of use for any class or description of number” in Convention 8.1-2 is ambiguous in terms of the meaning of “class or description”. This expression, used in the Authorisation Regulations, is not intended to have deeper significance than would be assumed from its general usage.

Neither does ComReg accept one respondent’s contention that the text of Convention 11.5-4 (on NP) – which is not new – promotes the concept of service portability.

## 2.2 New Numbering Applications Procedures

### 2.2.1 Background

It was proposed to publish the attached draft Numbering Applications Procedures document in February 2004<sup>4</sup>, alongside the revised National Numbering Conventions, subject to any feedback received from this public consultation. This document collects together procedures and forms that were previously available only as individual documents, typically included in Decision Notices or Information Notices and integrates them into a single easily accessible document.

Respondents were invited to review the document and provide their comments to ComReg.

**Q. 3. Do you agree with the content of the draft new Numbering Application Procedures and Application Formats document, as attached?**

### 2.2.2 Support for Publication of the new Application Procedures & Forms

Respondents either specifically expressed support for the new Procedures and applications format documentation or else didn't directly answer this question but limited themselves to commenting on the text and coverage.

### 2.2.3 Commission's Position

In view of the fact that no respondent objected to its publication, ComReg will proceed with publishing the new applications document. The detailed comments received will be taken into account before publication, as discussed below.

**Q. 4. If you have any specific comments on the [Applications] document, please include these with your response.**

### 2.2.4 Specific Views of Respondents on the Application Procedures & Forms

Respondents submitted a limited number of inputs, the main ones of which can be summarised as follows:

- **Written applications:** The requirement for written and signed applications for numbers to back up initial email applications should be relaxed, in order to cut down on administrative overheads;

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<sup>4</sup> Extended into March as a result of an extended deadline subsequently offered to respondents.

- **Errors:** Access code 084 (Access Telecom) should be added to Table 2. Also, the table of Appendix II needs to be updated to take account of recently concluded number changes;
- **Ex-quarantine mobile numbers:** A column showing numbers that have finished their quarantine period but have not yet been brought back into inventory is needed in the table of Appendix VII;
- **Textual Changes:** Some minor and/or editorial changes were suggested by respondents.

#### 2.2.5 Commission's Position

The various points made by respondents in Section 2.2.4, are addressed below:

- **Written applications:** ComReg has reconsidered the need for written and signed applications to back up initial email applications for numbers. It has been decided that in order to reduce the administrative overheads for all, this formality will remain a requirement only for the first application by an organisation; in all subsequent applications for any specific number/code type an email application will suffice.;
- **Errors:** ComReg will correct Table 2 by inclusion of the 084 access code and the corresponding network, Access Telecom. Also, the table of Appendix II will be updated to take account of recently concluded number changes;
- **Ex-quarantine mobile numbers:** ComReg agrees with the respondent who felt that applications for mobile numbers should include information on holdings of ex-quarantine numbers, as the re-use of such numbers can delay the need for new allocations. A footnote will be attached to the existing "Free to Allocate" column to achieve this effect without making the existing form more complex;
- **Textual Changes:** Some minor and/or editorial changes suggested by respondents will be adopted as appropriate.

### **3 Next Steps**

The following steps should now take place:

- Publication of the updated National Numbering Conventions, with changes as described herein. The conventions take immediate effect;
- Publication of the new Numbering Applications Procedures document, with changes as described herein. The processes and application formats are immediately applicable;
- Updating of the document “Irish Telephony Numbering Scheme – Status Report”, before the end of June 2004, with correction of Personal Numbering references and certain other changes that are then valid;
- Consideration by NAP, within its own timescales, of issues referred to it within this document;
- Inclusion of links to numbering documents on the Numbering page of ComReg’s web site, as soon as possible.