



Commission for
Communications Regulation

Prefix codes for Text Relay Services

Consultation

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An Coimisiún um Rialáil Cumarsáide

Commission for Communications Regulation

Abbey Court Irish Life Centre Lower Abbey Street Dublin 1 Ireland

Telephone +353 1 804 9600 Fax +353 1 804 9680 Email info@comreg.ie Web www.comreg.ie

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1 Introduction

- 1 In 2015, the Commission for Communications Regulation (“ComReg”) published a consultation paper in which it proposed certain measures relating to a Text Relay Service (“TRS”)¹ and ComReg subsequently published its Response to Consultation and Decision (“the TRS Decision”).²
- 2 A TRS enables deaf and hard of hearing persons to use telephony services. A caller who is deaf or hard of hearing types a message which is received by an operator. The operator then forwards the message by calling the phone number provided by the caller. The verbal response of the called party is then converted to a text message by the operator and sent to the caller. The system also works in the reverse when the called party is the person who is deaf or hard of hearing.
- 3 The full text of the TRS Decision is contained in [ComReg 15/143](#). In summary, any undertaking providing a “publicly available telephone service” (“PATS”) and having more than 100,000 subscribers must provide a TRS from 1 January 2017.
- 4 In its response to the TRS consultation, BT Ireland Ltd (“BT”) stated that it was considering the provision of a wholesale TRS solution.³ ComReg liaised with BT in order to understand if this solution would be a viable option for undertakings that are subject to the TRS Decision, noting that the solution would cater for local and national calls made via a TRS but not international calls (the TRS Decision does not mandate the provision of a TRS for international calls).
- 5 Under BT’s solution, deaf or hard of hearing end-users would attach a TRS prefix code to the number to be called. ComReg now proposes to introduce two such prefix codes:
 - (i). “14000” to indicate that the calling party is deaf or hard of hearing; and
 - (ii). “14001” to indicate that the called party is deaf or hard of hearing.

¹ ComReg Document 15/21 – Electronic Communications:- Proposed Measures in relation to Text Relay Services – published 05 March 2015

² ComReg Document 15/143 – Electronic Communications Provision of access to a Text Relay Service: Response to Consultation and Decision – published 30 December 2015

³ Details of BT’s wholesale proposal are contained in Annex 2 of ComReg 15/143.

- 6 An industry meeting was held by ComReg on 26 January 2016 to discuss BT's proposal and the TRS prefix codes. Attendees expressed agreement in principle with the introduction of the two prefix codes and there were no objections to the opening of TRS prefix codes on operators' networks.
- 7 ComReg would note that the introduction of the TRS prefix codes, together with certain minimal conditions which would attach thereto, would merely enable operators such as BT to offer a wholesale TRS solution which other undertakings *may* choose to use. Undertakings that are subject to the TRS Decision would not be required to avail of any such wholesale solution. Such undertakings must comply with the TRS Decision but *how* they comply is a matter for themselves. Availing of a wholesale solution, as may be offered by BT or by any other undertaking, would merely be one means of complying but undertakings would be free to develop and adopt alternate means.
- 8 ComReg would further note that the proposed "14000" and "14001" TRS prefix codes would not be exclusive to BT but could be used by any authorised undertaking that may decide to provide an equivalent wholesale TRS solution.
- 9 If ComReg should ultimately decide to introduce the "14000" and "14001" TRS prefix codes then it would do so by making appropriate amendments to the Numbering Conditions of Use and Application Process.⁴
- 10 ComReg invites interested parties to comment on the proposed introduction of new "14000" and "14001" TRS prefix codes and on the conditions which would attach to same.

⁴ ComReg Document 15/136 – Numbering Conditions of Use and Application Process – published 22 December 2015.

2 Proposed Text Relay Service prefix codes

2.1 14000 and 14001 prefix codes

- 11 ComReg proposes to introduce two new prefix codes to facilitate the provision of a wholesale TRS solution:
- (i). “14000” to indicate that the calling party is deaf or hard of hearing; and
 - (ii). “14001” to indicate that the called party is deaf or hard of hearing.
- 12 In the UK, Ofcom has introduced 5-digit TRS prefix codes for local and national calls. ComReg likewise proposes that the above prefix codes would enable Irish end-users who are deaf or hard of hearing to make local or national calls using a TRS, but not international calls.
- 13 To date, TRS prefix codes have never been used in Ireland. ComReg is of the preliminary view that the introduction of such prefix codes should not cause any conflict if provisioned on Irish operators’ existing networks.
- 14 The proposed TRS prefix codes would not be exclusive to BT or any other authorised undertaking(s) but could be used by any authorised undertaking that may decide to provide an equivalent wholesale TRS solution.

Q. 1 Do you agree with the proposed introduction of “14000” and “14001” prefix codes for TRS? Please explain your response and provide any supporting information.

2.2 Proposed conditions of use

- 15 ComReg proposes that the following four conditions would attach to the proposed TRS prefix codes:
- a) TRS prefix codes shall be the 5-digit codes “14000” and “14001”.
 - b) TRS prefix codes may only be used to provide a “TRS” within the meaning of that term as set out in ComReg Decision D09/15.
 - c) The “14000” prefix code shall only be used for text-to-voice or text-to-text TRS.
 - d) The “14001” prefix code shall only be used for voice-to-text TRS.
- 16 ComReg proposes that the above conditions should apply to all authorised undertakings and therefore should attach to the General Authorisation (GA).

Q. 2 Do you agree with ComReg's proposed conditions for "14000" and "14001" prefix codes for TRS? Please explain your response and provide any supporting information.

3 Next Steps

- 17 ComReg invites the views of all interested parties and will consider all information submitted on foot of this consultation. ComReg's response to this consultation will be published in due course.
- 18 ComReg considers that the substantive regulatory measure in this case was the TRS Decision made in December 2015. The TRS Decision did impose a new regulatory obligation on certain authorised undertakings and ComReg therefore conducted a full RIA in respect of same. ComReg considers that the decision being proposed in this consultation - to introduce new prefix codes to facilitate a wholesale TRS solution - would not impose an actual regulatory obligation. The prefix codes would merely enable authorised undertakings to offer a wholesale TRS solution of which other undertakings may avail. The proposed decision would thus increase the options available to undertakings but would not, of itself, impose an actual obligation. Further, ComReg considers that the conditions which it is proposed to attach to such prefix codes are very minimal. For these reasons, ComReg does not consider it necessary to conduct a RIA in this instance.

3.1 Submitting comments

- 19 The deadline for submitting a response to this consultation is 5:30pm on 12 August 2016.
- 20 All respondents should reference the relevant question numbers and/or paragraph numbers from this document. Respondents should also set out the rationale for their submitted views in full and should provide any supporting information.
- 21 ComReg will publish all responses to this consultation in due course in accordance with its *Consultation Procedures*⁵ and its *Guidelines on the Treatment of Confidential Information*⁶. Respondents must provide confidential and non-confidential versions of any document for which confidentiality is claimed and any assertion as to the confidentiality of information (e.g. that it is commercially sensitive) must be explained in full.
- 22 Electronic responses to this consultation must be submitted in an unprotected format so that they can be appended to ComReg's submissions document for electronic publication.

⁵ ComReg Document 11/34 – Information Notice on ComReg Consultation Procedures – published 6 May 2011

⁶ ComReg Document 05/24 – Guidelines on the treatment of confidential information: Final text of Guidelines – published 22 March 2005.

- 23 All responses to this consultation should be marked:- “Reference: Consultation 16/59– Prefix codes for Text Relay Services” and sent by post, facsimile or e-mail to arrive on or before 5:30pm, on 12 August 2016, to:

Mr. Brendan O’Brien
Freepost
Commission for Communications Regulation,
Block DEF, Abbey Court, Abbey Street,
D01 W2H4, Dublin.

Ph: +353-1-804 9605

Fax: +353-1-804 9680

Email: marketframeworkconsult@comreg.ie

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