



Commission for
Communications Regulation

Response to Consultation

Numbering Conventions 2nd Revision

Response to Consultation

Document No:	02/108
Date:	06, December 2002

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1 INTRODUCTION

The National Numbering Conventions can be considered to be the basic rule book that describes how ComReg Numbering Plan Management, on behalf of the Commission, fulfils its responsibilities to manage the national numbering resource. 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 by version 2 (ODTR 01/94), which extended coverage into a number of new areas. A draft Version 3, was published in draft form on 30 September for public consultation, along with consultation document ODTR 02/82.

Tracked changes from Version 2 were made visible to potential respondents, who were asked to comment specifically on these highlighted changes. This report now describes the outcome of that consultation and the changes that will be made as a result.

Version 3 proposed the introduction of changes or new text in respect of the following topics, as well as some more routine textual changes or improvements:

1. Explicit requirement for the opening of access to European Telephony Numbering Space (ETNS) numbers;
2. Mailbox numbers introduced in the fixed network;
3. Text messaging short codes (new 5XXXX SMS codes framework);
4. National Signalling Point Codes (NSPCs) – these are codes used for network signalling within Ireland between operator's switches. The new framework expects the NRA to take control of these, whereas it has been less formal here up to now;
5. Exclusion of the use of over-length numbers (i.e. appending extra digits to the end of phone numbers);
6. Rewrite of the process for national number changes (Annex 6);
7. Acknowledgement of the imminence of the new legislative framework (*Note: ComReg does not expect significant impact on the Conventions from the new framework as they are already largely compliant with it. Furthermore, the present revision includes some anticipatory adjustment, such as in the areas of ETNS and NSPCs. If other changes are found necessary, they will be included in the next revision*).

Numbering Conventions 2nd Revision/Response to Consultation

There were 4 respondents to this consultation, as follows:

Respondent
<i>eircom</i>
Esat BT
Trust5 (Trutxt Ltd.)
Vodafone

2 CONSULTATION ISSUES

2.1 Opening of access to European Telephony Numbering Space (ETNS)

2.1.1 Summary of Consultation Issues

National support for the ETNS, based on the code "3883", has been an expectation of the European Community for some time and the new Universal Services Directive (2002/22/EC) now makes it a formal requirement from July 25, 2003 for Member States to ensure that all *undertakings*¹ handle all calls to the ETNS. As this obligation is without prejudice to the recovery by the *undertaking* of the cost of conveyance of such calls, ComReg believes it makes sense to introduce coverage of the ETNS in the Conventions at this time.

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

2.1.2 Views of Respondents

Respondents agreed with the new text, with operators simultaneously emphasising the importance of the principle that there should be no compulsion on organisations to provide support for ETNS services if fair commercial terms could not be agreed. Operators also welcomed the recent discussions in the Numbering Advisory Panel (NAP) aimed at clarifying details of how ETNS operates, while one operator stressed the importance of ensuring ETNS complies with ITU-T Recommendations.

2.1.3 Commission's Position

The new text will be retained and the NAP will continue to monitor progress of ETNS and to make representations to appropriate parties if issues of concern arise. While the ETNS is outside the national numbering scheme, the Commission recognises the concerns of operators to see it is introduced in a way that is best suited to their needs and to overall national needs.

2.2 Mailbox Numbers In The Fixed Network

2.2.1 Summary of Consultation Issues

The issue of introducing mailbox numbers into the fixed network was discussed at length in the NAP and a positive ODTR decision on the matter resulted in the commencement of formal number allocation to all geographic number holders. The conditions of allocation were decided by ComReg, taking account of discussions in the NAP. The new text in Version 3 of the conventions now aimed to bring these procedures into the framework of the Conventions and comments were invited on the manner in which this was done.

¹ In practice, this means all telecoms network and service providers

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

2.2.2 Views of Respondents

Two operators expressed concerns with certain parts of the existing text, with one of these concentrating on potential difficulties if the usage of the mailbox prefix is not clearly communicated to users. This operator strongly supported that promotion of the numbers should follow the format used in the notes to convention 11.2.4-2, as follows:

- **"08 + STD Code + Subscriber Number"** in the case of calls from anywhere within Ireland; and
- **" +353+8+STD Code+Subscriber Number"** in the case of calls from abroad.

The other operator with concerns about the mailbox text felt that the existing text describes the service and that this is inappropriate for the numbering conventions. They also objected to the requirement that calls to fixed mailboxes from abroad must not be charged at a higher rate than calls to the corresponding subscriber number. This operator also disagreed with the draft text referring to the origination of calls from mailbox numbers and linked this to wastage of national resources leading to potential number shortages. Finally this operator asks that text be added to ensure that porting of a mailbox occurs automatically with porting of the subscriber number, involving no extra charge for porting of the mailbox, as per agreements in the NAP.

2.2.3 Commission's Position

The Commission agrees that communication of mailbox numbers is complex and may lead to confusion if not done consistently and in a way the consumer can understand. Accordingly, the text of convention 11.2.4-2 will be restructured to use the format shown in the notes rather than that in the actual draft conventions themselves and an example will be added in the service description in section A7.1.

The Commission does not accept the general contention that it is inappropriate to include relevant requirements for services in the numbering conventions in cases where these are laid down as conditions of allocation of specific number types; however, it agrees that the specific convention 11.2.4-3, covering the service of providing timely notification of mail, should be removed. It also accepts that charges made by foreign operators for calls to Irish mailbox numbers cannot be regulated by the Commission and therefore the text of existing convention 11.2.4-5 (new convention 11.2.4-4) should be amended in recognition of this.

The Commission notes the concerns expressed about the origination of calls from fixed mailboxes and the text of convention 11.2.4-7 (to become 11.2.4-6 in Version 3.0) will be strengthened accordingly. While such origination should not be banned outright in case highly desirable innovations are developed in the future, it should be understood that ComReg is not currently aware of any such services and does not in principle support call origination from mailboxes. The Commission does not

agree with one respondent's contention that the allocation of the geographic NDC "80" (STD 080) for mailbox purposes has a significant impact on available numbering resources.

The Commission agrees that there should be no additional costs associated with porting of mailbox numbers; however, no changes are necessary to the draft conventions as the existing text of convention 11.10-7² already ensures no extra charges are applied. (*Note: Of course normal charges will still operate in respect of calls to ported mailboxes, as described in draft convention 11.10-8.*)

2.3 Text Messaging Short Codes (SMS)

2.3.1 Summary of Consultation Issues

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

Furthermore, some clarification of how charges specified for individual codes can be applied has been included in the Service Descriptions, A7.5.3, in the light of practical experience. The number of codes which can be allocated to any organisation has also been increased in the light of experience.

Note: It is not envisaged that the new quota on codes will be further relaxed in the future as it is considered ample to meet any SP's real needs, especially when the ability to use keywords is taken into account. SPs should therefore manage their usage with this in mind.

- Q. 3. Do you agree that the new text covering text messaging short codes has been properly introduced to the Conventions document, as described in ODTR 02/14? (i.e. New sub-section in 11.3.8, and addition to A7.5.3 (service description), plus some incidental references, as relevant).**
- Q. 4. Do you agree that the last two paragraphs of A7.5.3 providing clarification on charging and on available allocations of codes are useful additions to remove ambiguity while relaxing allocation limits?**

2.3.2 Views of Respondents

All respondents to question 3 agreed with the new text described there. Of the three respondents addressing question 4 (last two paragraphs of Section A7.5.3), two were in favour or very strongly in favour ("provide much needed clarification") while one felt they do not add clarity.

Apart from these answers, one respondent pointed out that the figure of €0.80 in convention 11.3.8-6 should state "including VAT", while another

² This will become 11.10-6 in Version 3.0 of the Conventions.

disagreed with the allocation of up to 25 codes to applicants, feeling this is wasteful and therefore not in accord with the Commission's responsibilities.

2.3.3 *Commission's Position*

The draft text will be retained, by inclusion of the words "including VAT" in respect of the charge of €0.80.

ComReg has received various requests from service providers for increased allocations from the original limit of 5 codes per category – including one request for 100 codes – and it has become increasingly clear that the types of services in operation and/or envisaged are very disparate indeed, with related differences in dependency on the use of distinctly different codes. In some cases these demands come from service providers who are aggregators (i.e. equivalent to multiple independent SPs), and while these organisations have justified demands for extra codes, it would also be too intrusive to distinguish them from other SPs. The Commission has therefore set a judicious upper limit of 25 codes for each applicant, while also recognising that this is not a perfect solution. It does not accept that this runs counter to good number management, as the demand for these codes is significantly below levels at which exhaustion might commence.

2.4 **New coverage of National Signalling Point Codes (NSPCs)**

2.4.1 *Summary of Consultation Issues*

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

<p>Q. 5. Do you agree with the new Conventions in Sections 11.9 and A1.9, concerning National Signalling Point Codes (NSPCs)?</p>
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2.4.2 *Views of Respondents*

The majority of respondents to this question agreed with the principle of ComReg taking responsibility for NSPCs, though one felt the allocation mechanism needs to be described. A dissenting respondent felt that ownership of NSPC codes should be retained and allocated by operators "in accordance with ITU-T Recommendations".

2.4.3 *Commission's Position*

The Commission believes that ComReg does not have an option in respect of ultimately taking responsibility for all point codes used in network addressing, as the new Framework Directive makes clear in its preamble 20. The issue is only whether it should happen immediately or after the Directive comes into force in 2003. In view of the support received, the

existing text will now be retained, though the Commission accepts the view of one respondent that this text is currently rather limited. ComReg will therefore also take steps to begin the recovery of all point codes used in inter-network addressing with the intention of having these included in the National Numbering Scheme by the end of July 2003, at latest. Finally, the Commission also welcomes suggestions for management and allocation of these codes, going forward, as well as input on appropriate additional text for the National Numbering Conventions.

2.5 Exclusion of Over-length numbers

2.5.1 Summary of Consultation Issues

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

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

2.5.2 Views of Respondents

All respondents supported this proposal. One went further and emphasised that not only should DQ providers be obliged to use only the preferred number presentation format, but section 12.3 should include a reference to Annex 5 and the last explanatory sentence of the new section 12.3 should be deleted.

2.5.3 Commission's Position

The new text will be retained and a cross-reference to Annex 5 will be added to section 12.3. The Commission believes the explanatory last sentence of Section 12.3 – which springs from NAP consideration of over-length numbers – is useful and should be retained. However, in the spirit of the responses received, the expression “The use of over-length numbers is not approved ...” will be strengthened to “... is not permissible ...”.

2.6 Revision of Annex 6 (Number changes)

2.6.1 Summary of Consultation Issues

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

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

2.6.2 Views of Respondents

Just two respondents replied to this question, with one supporting the changes and one not convinced that they are an improvement. Changes suggested include:

- re-insertion of the previous stages 4 and 5 (dealing with public announcements);
- clarification needed on the terms “public commencement” and “affected network operators”;
- reconsideration of the text about quarantine of numbers.

2.6.3 Commission’s Position

The Commission considers that the changes represent an overall improvement, based as they are on real experience and extensive discussion in the NAP of current number changes; therefore they should be retained. The new stage 3 is more generic and less prescriptive than the corresponding old stages 3, 4 and 5, and better reflects what is now happening in the Number Changes Communications Group.

The Commission accepts that clarification of “public commencement” would be useful and therefore stage 4 will be amended. It is also accepted that a footnote would be useful in respect of the quarantining of numbers where lengthening of numbers occurs.

The Commission considers that the term “affected network operators” is sufficiently self explanatory. However, a change from “affected network operators” to just “network operators” is appropriate in the case of the new Stage 9.

2.7 Inclusion of Number Activation Process

2.7.1 Summary of Consultation Issues

The NAP has developed a process that ensures all relevant entities are made aware of newly activated numbers or number ranges (i.e. numbers brought into operation). The NAP’s recommendation was included as an Appendix to the consultation document. The Commission invited views on whether the relevant parts should be included in the Numbering Conventions.

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

2.7.2 Views of Respondents

Respondents were against inclusion of this annex in the Numbering Conventions, although its value in respect of ensuring proper number activation was recognised. One respondent suggested that in view of the importance of notification, consideration should be given to including the process in the O & M Manual.

2.7.3 Commission's Position

The Commission accepts the view that the Numbering Conventions document is not the most appropriate place for this document. The process it describes is already accepted at industry level as NAP Recommendation 6 and an email 'exploder' (a distribution list, whose address is currently activations@comreg.ie) has been set up by ComReg in support of that process. Consideration will be given, as suggested by one respondent, to including the process in the O & M Manual but in the meantime it will retain the status of informal but recommended process for number activators. The email exploder works by distributing email notifications of number activation sent by any listed operator (in whatever document format they are received) to the relevant contact points in each company. It is the responsibility of each company to ensure that it maintains its own contact point(s) in this list up to date, by notifying ComReg of any changes.

3 NEXT STEPS

Version 3 of the National Numbering Conventions document is published in parallel to this report. It will remain in operation until some time after the new European legislative framework (or the Irish transposition thereof) comes into force in July 2003. A further consultation, followed by the publication of a new version will then take place in due course later in 2003.