



An Coimisiún um  
**Rialáil Cumarsáide**  
Commission for  
**Communications Regulation**

# Review of the Numbering Conditions of Use and Application Process

Non-Confidential Submissions to  
Consultation 21/28

## Submissions to Consultation

**Reference:** ComReg 21/75s

**Version:** Final

**Date:** 19/07/2021

**An Coimisiún um Rialáil Cumarsáide**  
**Commission for Communications Regulation**

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## Submissions Received from Respondents

Document No:	21/75s
Date:	19/07/2021

Consultation:	21/28
Response to Consultation, Decision and Further Consultation:	21/75

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# 1: ALTO

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# alto

alternative operators in the communications market

**Consultation: Review of the Numbering Conditions of Use - Ref:  
21/28 and 21/28a**

**Submission By ALTO**

**Date: May 11<sup>th</sup> 2021**

ALTO is pleased to respond to the Consultation: Review of the Numbering Conditions of Use - Ref: 21/28 and 21/28a.

ALTO welcomes this opportunity to comment on this important consultation.

As you are aware, ALTO is the leading representative group representing the interests of alternative telecommunications companies' interests within the State. Those alternative telecommunications companies operate in the business, consumer and international carrier sectors and have done so successfully for quite some time now both locally in Ireland as well as outside the State.

ALTO generally welcomes the important reforms proposed by ComReg in this Consultation.

## **General Remarks**

1. ALTO has carefully analysed and reviewed the contents of ComReg Document references 21/28 and 21/28a. To that end we remark that ComReg appears to have taken into consideration the issues arising for the most part.
2. ALTO has been heavily engaged in work relating to the transposition and preparation for the European Communications Code or EECC. We note that aspects of regulation and in particular the interpersonal communications with number dependent Interpersonal Communications may operate, challenge the existing telecommunications and numbering landscape and will pose some challenges for ComReg and the industry in the short to medium term. We note also the status positioning of ECN/ECS being tied more than ever to the numbering spectrum. We further note the interplay between the National Numbering Conventions as they were and Article 106, a matter raised with

ComReg's retail division some weeks ago concerning the very issues addressed in this Consultation paper.

3. ALTO notes the new definition of reseller and the various protections and prohibitions in-built to the Conditions of Use and Application Process Document Ref. 21/28a read in conjunction with this Consultation.
4. ALTO explicitly agrees with the decision to move Public Protection and Disaster Relief services to a mobile number range. It may be an additional consideration to the ultimate cessation and closure of the 076 range entirely arises. A matter widely discussed at industry for some time now.
5. ALTO supports ComReg's proposal for a two-year extension to the closure date for the 1850/1890 numbers listed by ComReg in the Consultation paper. More generally ALTO notes and indeed submits that there appears to remain an education issue with regard to end-user migration away from 1850/1890 and 076 ranges which is not in any connected with, or the fault of the industry.
6. ALTO suggests that ComReg investigates whether further funding and investment is required to enable education and the efficient transition away from the 1850/1890 and 076 number ranges due for closure.
7. ALTO notes ComReg's proposal to conduct an evidence-based review in 2023 to determine if any further extended operation of any of the NGNs in figure 1 of the Consultation paper is needed. We consider the providers taking advantage of the extension should demonstrate to the regulator that they are progressing the rollout of their signage on poles and utility meters for future reviews to continue this extension. It is very inefficient for industry to keep a whole number

range open for just six numbers and the lack of regulatory framework around these numbers adds to this concern.

8. ALTO notes with interest the onset and deployment of Cloud Numbering generally and the various positions set out by ComReg in the Consultation paper concerning Rights of Use. ALTO remarks that these conditions and Rights of Use do not appear to be set out in the ComReg Document 21/28a and that should be addressed. The assumptions and use cases arising in the Consultation paper should also be included in a clear and accessible format within Document 21/28a.

## **Response to Consultation Questions**

ALTO does not propose to answer the Consultation Questions in each instance, instead leaving those replies over to individual members to consider and respond to without prejudice to the generality of this response.

**ALTO**

**11 May 2021**

## 2: BT Communications Ireland (“BT”)

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# BT Communications Ireland Ltd [“BT”] Response to ComReg’s Consultation:

## Review of the Numbering Conditions of Use and Application Process.

### Issue 1 – 11 May 2021

#### 1.0 Introduction

We welcome the opportunity to comment on this important area of telecoms which forms an integral part of the voice and increasingly other types of communication services. We would also like to acknowledge the considerable work ComReg has undertaken in modernising the NGN ranges over the past years and to say we support this work fully.

Please find attached our response to the detailed questions.

#### 2.0 Response to the Detail Questions

A1 BT welcomes the ComReg discussion within this consultation concerning the EECC proposals and the option of assigning certain numbers for IOT/M2M and we support ComReg’s proposal in clause 43 to further consult with industry on the future application of numbers to support future use cases including non ECS providers.

A5 BT agrees with ComReg’s proposed implementation of the relevant provision of Article 106 as it relate to number portability. We consider the Internet Access Switching IAS aspects of Article 106 are out of scope for this consultation as we believe certain aspects of the IAS need clarification by the industry and ComReg.

A7 BT agrees with ComReg’s proposal for the Public Protection and Disaster Relief (PPDR) services to move to a mobile number range. We note that this issue has been discussed at the NGN industry forum chaired by ComReg and we support moving this range away from 076. For technical and good number management reasons we also consider it more efficient to close the 076 range completely so it can be put aside for future uses rather than keeping small parts of it open which could confuse customers in any future use of the range. We also note this is an opportune time to switch the numbering as it aligns with a refresh of the technology currently being used.

A8 Following extensive industry discussion within the NGN group we agree with the ComReg proposal for a two-year extension to the closure date for the six/seven 1850 numbers listed by ComReg and the Covid Number. It is also our view that no further 1850 numbers should be added to this limited set of numbers as the incentive should be to close the 1850 range completely.

Additionally given that ComReg decided not to introduce new regulations for the 1850 given the expectation that the whole range would close we consider the wholesale pricing of these services should be maintained on a fair and reasonable basis. We believe ComReg could consider seeking an operator fair and reasonable legal commitment concerning the use of these numbers. Whilst there

are only six/seven numbers we are aware that one of the numbers drives a substantial volume of minutes.

A9 BT agrees with ComReg's proposal to conduct an evidence-based review in 2023 to determine if any further extended operation of any of the NGNs in figure 1 is needed. We consider the providers taking advantage of the extension should demonstrate to the regulator that they are progressing the rollout of their signage on poles and utility meters for future reviews to continue this extension. We consider it inefficient for operators and the industry to keep a whole number range open for just six/seven numbers and the lack of regulatory framework around these numbers adds to this concern.

A10 BT considers that international calls to Irish freephone would not be free to cover the payment of international settlement call charges and to limit the risk of fraudulent or malicious activity.

A14 BT agrees with the proposed text for the numbering conditions and we would like to provide two observations/comments:

- a. We observe closure of the current 1850, 1890 and 076 ranges have a large dependency on customer (Service Provider) behaviour and the inertia to migrate is more difficult to manage than the previous number change programmes
- b. We acknowledge ComReg provided three years notice of the closure of the 1850, 1890 and 076 ranges and as the closure date nears hindsight is suggesting that any future number closure dates should be set for a date that avoids holiday periods or times when networks may be in lockdowns. This is very much hindsight and learning to take away from this project.

A18 We don't agree with ComReg's proposal to retain the geographic condition requiring the end-user's premises to be physically located within the designated MNA for that number. We note that international customers constantly request to use local geographic numbers for their services but it's not viable for them to locate in every MNA, so they are ultimately forced to use the non-geo ranges.

A20 We believe the MNA concept has become outdated and should be removed for the following reasons:

- a. The ComReg MNAs are designed around the network of one operator in Ireland and every other operator is forced to adapt their systems to that one operators' format. This is inefficient and adds additional costs to operators that must artificially construct their platforms and carrier VoIP platform to the MNAs.
- b. The roll-out maps of other operators even today are not the same as that of the MNAs, so all operators are being constrained to the historical design of one company.
- c. The industry is actively migrating to SIP interconnect which is removing the distance element of routing in Ireland, i.e. Single Tandem and Double Tandem will soon be consigned to history (hopefully this year). As the switching function retracts to the core of the network so the MNAs are becoming an artificial construct as the networks modernise.
- d. The recent announcement by Eircom of the Copper Withdrawal Project will ultimately see the copper network close in the coming years and it's time to modernise MNA structure to align with the evolution of the networks.
- e. We are aware of number shortages in at least 8 areas of Ireland which are constrained by the MNAs. The MNA have been important in the management of the voice networks and billing in the past but their relevance is diminishing quickly to the point where we



have to refuse customers the right to have local numbers as they don't have a geographic premises within the MNAs.

- f. Customers could keep their geo phone numbers when they move premises outside of the MNAs.
- g. ComReg has achieved considerable progress resolving the issues with NGN numbers and we would strongly recommend ComReg consult with a view to modernising the geographic numbers considering the substantial evolution of networks that is taking place.

A23 We agree with the proposal that ComReg will continue to monitor development in Cloud services at ECC/CEPT, to promote greater policy harmonisation for Cloud services across Europe. BT operates in circa 180 different countries often supplying global solutions to large multi-nationals hence harmonisation is key for both multinational customers and operators providing the services. We also agree with ComReg's earlier proposal in this consultation to further consult in this new and growing area of number applications so that Ireland can engage fully in international solutions.

A24 We agree with ComReg's proposal to reserve 1000 in the number range 089 011 to 089 011 0999 for drama use. The film industry is important to Ireland's economy and society and it is right and proper for the communications industry to help other sectors of industry where appropriate. We also note that part of the 555 number range in the US is used for the same purpose hence there is a good precedent for this proposal.

End



### **3: Commission for Regulation of Utilities ("CRU")**

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## **Review of the Numbering Conditions of Use and Application Process (ComReg 21/28) Consultation response**

The CRU is Ireland's independent energy and water regulator. Central to what the CRU does is its public interest mandate. A key role is to ensure safe, secure and sustainable energy at a reasonable cost for every Irish home and business.

Within the CRU's regulatory remit of ensuring safe supply of energy falls our role in the promotion and public awareness of energy safety. The CRU ensures that business and organisations such as energy distributors and suppliers maintain their regulatory commitments to not only providing energy in a safe manner, but also advising their customers of their rights and responsibilities in this regard.

In our previous responses to ComReg's previous consultations and engagement on the withdrawal of Non-Geographic Numbers, the CRU has drawn attention to potential safety concerns with ceasing the 1850 range for utilities providers emergency phone numbers.

The CRU has reviewed ComReg's Review of the Numbering Conditions of Use and Application Process consultation document. As our interest centres on proposals for discontinuing 1850 numbers we have restricted our responses to consultation question eight and nine.

### **Q. 8**

**Do you agree with ComReg's proposal to extend the operation of the utility emergency contact numbers in Figure 1 until 31 December 2023? Please explain the basis for your response in full and provide supporting information.**

The CRU agrees in principle with the proposal of extension to NGN 1850 numbers for utility providers' emergency lines.

The CRU notes that ComReg's proposals for withdrawing 1850 for utilities providers emergency numbers would not come into effect until end of 2023 at the earliest, a two-year extension on ceasing general 1850 numbers, during which time the 1850 numbers will run in parallel with replacement freephone numbers.

We are satisfied this should allow utilities providers enough time to rebadge their assets with their new numbers. However, detail on the practicalities of any proposed recorded announcements after parallel running ends should be provided prior to the extension being formally agreed.

### **Q. 9**

**Do you agree with ComReg's proposal to conduct an evidence-based review in 2023 to determine if any further extended operation of any of the NGNs in Figure 1 is needed? Please explain the basis for your response in full and provide supporting information**

The CRU agrees that following the extension there should be a review process analysing the volume of calls continuing to be made to 1850 numbers in order to agree next steps.

The final decision to withdraw 1850 emergency numbers should only be made following a comprehensive review of call volumes and types (e.g. whether genuine emergency) to the respective numbers between a defined period following the 2021 withdrawal. This is required to ascertain the level at which 1850 numbers are continuing to be used.



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um Rialáil Fóntas  
**Commission for  
Regulation of Utilities**

If a significant number of phone calls are still being received on the 1850 numbers during the review period, there may be a case for a further stay in their withdrawal or other mitigations being put in place.

The format of the review process should be decided before the extension to 1850 numbers is approved. The CRU considers such review should be based on a safety-risk analysis following the ALARP [As Low As Reasonably Practicable] or similar principles.

**ENDS**



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um Riala il Fónas  
**Commission for  
Regulation of Utilities**





## 4: Eir Group (“Eir”)

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**eir Response to ComReg Consultation:**

**Review of the Numbering Conditions of Use and Application Process**

**ComReg Document 21/28**



**11 May 2021**

**DOCUMENT CONTROL**

<b>Document name</b>	eir response to ComReg 21/28
<b>Document Owner</b>	eir
<b>Status</b>	Non-Confidential

The comments submitted in response to this consultation document are those of Eircom Limited and Meteor Mobile Communications Limited (trading as 'eir' and 'open eir'), collectively referred to as 'eir Group' or 'eir'.

## Response to consultation

1. eir welcomes the opportunity to comment on ComReg's proposed changes to the Numbering Conditions.

### **Q. 1 Do you agree with ComReg's preliminary position on the assignment of numbers to non-ECS/ECN as permitted by Article 93(2) and Article 94(7) of the EECC?**

2. eir agrees with ComReg's position.

### **Q. 2 Do you agree with ComReg's position that Article 93(4) of the EECC does not require further amendments to the Numbering Conditions document?**

3. eir agrees with ComReg's position that no further action is required at the current time.

### **Q. 3 Do you agree with ComReg's position that amendments are not presently required to the Numbering Conditions document in light of Article 93(6) or Article 106(6) of the EECC?**

4. eir agrees no amendments are needed at the current time and looks forward to reviewing the report from the Wik study.

### **Q. 4 Do you agree with ComReg's position that no amendment to the Numbering Conditions in respect of Article 96 of the EECC is required?**

5. eir agrees no amendments are needed at the current time.

### **Q. 5 Do you agree with ComReg's proposed implementation of relevant provisions of Article 106 of the EECC relating to provider switching and number portability?**

6. eir agrees that the requirements in the Code for the number to be available post termination are already met in Ireland.
7. eir would suggest a minor amendment to the proposed text to be included in the Numbering Conditions as follows: *"In addition, the end-user retains the right to port the terminated number to another provider at any time during the quarantine period unless that right is renounced by the end-user. There shall be no conditions placed on an end-user to re-contract or make contact with the provider ~~where~~with whom the number is quarantined in order for that number to be ported."*

**Q. 6 Do you agree with ComReg’s proposed reflection in the Numbering Conditions Document of consequential amendments to Appendix 11 “Definitions” arising from the EECC?**

8. eir agrees with the proposed text for the definitions.

**Q. 7 Do you agree with ComReg’s proposal for PPDR Numbering?**

9. eir has no objection to the proposal to make mobile numbering resources available to OGCIO for TETRA use. However eir cannot commit to the proposed deadline of 30 September 2021 to open a new mobile range particularly as this work cannot be planned and scheduled until after ComReg has made its Decision and allocated the numbering resources.
10. eir notes that paragraph 101 states: “*The agreed industry lead-time for opening new number blocks on networks is three weeks.*” eir is not aware of any such agreed lead time and requests ComReg to point to the relevant Decision that supports the statement. As we have noted in the past eiris of the view there are a range of considerations that will inform a reasonable time period for the opening of a new number range which makes it impossible to mandate a three week lead-time.

**Q. 8 Do you agree with ComReg’s proposal to extend the operation of the utility emergency contact numbers in Figure 1 until 31 December 2023?**

11. eir has no objection to the proposal to extend the operation of the 6 numbers listed in Figure 1 for a period of 2 years. We note that any further extension would follow a detailed review and Decision making process by ComReg.
12. eir notes, following discussion at the Industry working group, that submissions may be made in respect of extending the use of some other 1850 / 1890 numbers. eir notes there are specific circumstances in respect of the 6 numbers that merit consideration of an extension. Namely that the numbers relate to safety of life scenarios, are ‘advertised’ on physical assets across Ireland, and it is not feasible to replace the physical ‘advertisements’ prior to 31 December 2021. eir also notes that the utility companies have already commenced implementing replacement numbers.
13. Any further requests to extend 1850 / 1890 should be scrutinised carefully and ComReg must present objective justification if it is proposed allow an extension.

**Q. 9 Do you agree with ComReg’s proposal to conduct an evidence-based review in 2023 to determine if any further extended operation of any of the NGNs in Figure 1 is needed?**

14. eir has no objection to an evidence based review being undertaken. This would be a necessary evidence base in any future consultation to amend the NGN decision.

**Q. 10 On what basis do you consider international calls to Irish 1800 Freephone numbers should be facilitated (e.g. free to call or otherwise)?**

15. The wording of question 10 suggests that ComReg has already reached a conclusion that international calls to Irish 1800 Freephone numbers should be facilitated as it seeks views on the charging arrangements for such calls. However as noted at paragraph 171 the obligation is on ComReg to first establish if this is economically feasible (not industry as suggested in paragraph 172).
16. eir has provided input to ComReg on the technical challenges associated with facilitating international calls to Irish 1800 Freephone numbers through the NGN WG. eir has also provided its view that there is no material demand for international access to these numbers. It is disappointing that ComReg has not reflected the views it has received in the NGN WG in the consultation.
17. Overseas operators will see these as Dublin numbers and charge accordingly. eir notes ComReg’s view at paragraph 164 *“Although the universal application of any changes required by operators outside of Ireland cannot be guaranteed, ComReg is of the view the necessary changes could at least be applied in those territories most frequented by Irish consumers (e.g. Member States visited by consumers for business reasons and holidays) and markets most likely to be buying online from Ireland.”* It is however not at all clear how that could be achieved or enforced. If international calls to 1800 numbers are to be free to caller at the retail level then there needs to be a mechanism at the wholesale level to compensate the originating networks and the home network operator in respect of roamers. This would require substantial international coordination on the part of ComReg.
18. If calls are to be chargeable at the retail level then how important aspects of the regulatory regime will apply needs to be clearly stated by ComReg. Despite repeated requests in the Industry working group for ComReg to clarify how Roam Like At Home rules would apply to these numbers eir is disappointed to note ComReg’s ‘advice’ in the consultation that *“it is*

*currently unclear how RLAH would apply to calls to freephone numbers.*<sup>1</sup> In the absence of any clarity on the application of the regulatory framework it is not possible for eir to comment on what charges should apply to calls made by Irish roamers to Irish 1800 numbers from abroad. It is also not clear if the visited network operator would levy wholesale roaming charges for calls to these numbers and how the home network operator would be able to recover these costs. There is also the outstanding question as to whether charging at the retail level and the necessary presentation of these calls on the customer's invoice is acceptable from a public policy perspective where free calls to 1800 numbers are currently suppressed from customer invoices taking into account that some of these calls may be to sensitive helplines.

**Q. 11 Do you consider that the cost of implementing international access to 1800 Freephone numbers would be reasonable for your organisation?**

19. ComReg states *“the WG agreed by consensus that, from a technical viewpoint, the routing and terminating of incoming international calls to 1800 Freephone can be accommodated.”*<sup>2</sup> eir does not agree with ComReg's statement. Whilst the physical routing of calls could work there may be significant development work required on wholesale and / or retail billing systems in order to 'accommodate' international calls to 1800. eir has already submitted material to ComReg on the wholesale billing challenges.
20. Changes to billing systems are non-trivial tasks and likely the costs would not appear to be reasonable relative to the absence of any material benefit from providing international access to 1800.
21. A number of matters raised in this response already need to be clarified if a proportionate economic assessment is to be developed by ComReg. ComReg's discussion of the topic is somewhat wishful and speculative. For example when considering whether overseas callers should be advised that calls are chargeable ComReg superficially notes *“The use of pre-call announcements may help to alleviate any misunderstanding, but would also increase implementation costs.”* Who does ComReg believe should be responsible for pre-call announcements? If it is the originating operator we are back to the problem of how overseas operators can be compelled to do this. If it is the terminating operator this would not be possible as it would require analysis of the calling party number for calls originating on overseas networks or awareness that an Irish mobile customer was roaming.

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<sup>1</sup> Paragraph 161

<sup>2</sup> Paragraph 157



22. There is insufficient detail regarding how ComReg proposes that the international access be implemented and regulated for us to consider costs in any detail.

**Q. 12 Do you foresee demand for international access to Irish 1800 Freephone numbers?**

23. eir as a supplier of 1800 numbers has not seen any demand for international access to these numbers. The service providers have other options available to them including the use of an Irish geographic number or an international Freephone number. As such we do not accept ComReg’s suggested benefits in the table on page 47 of the consultation are in any way material. The costs however of implementing access may be depending on the extent of changes required to the retail and wholesale billing systems of Irish operators.
24. The fact that ComReg acknowledges consumers may need to be educated as to the use of Irish 1800 numbers in an international context strongly suggests there is no tangible consumer demand for such a service. It is notable that ComReg did not include this topic in the research it commissioned and published alongside this consultation related to other matters considered in the consultation.
25. We note (at paragraph 155) *“it seems reasonable to ComReg that many businesses based in Ireland will want to target their online advertising beyond Ireland, so demand for international access in likely to grow very quickly.”* eir requests ComReg to share its research as we have not seen any evidence of such demand from the market-place.

**Q. 13 Are there any other issues relating to the potential introduction of international access to Irish 1800 Freephone numbers that ComReg should consider?**

26. eir has no further comments to make at this time.

**Q. 14 Do you agree with ComReg’s proposed text for the Numbering Conditions to take account of operator obligations arising due to the ceasing of number ranges?**

27. eir agrees with the sentiment of proposed text. However the references to charges in paragraph (a) is unnecessary as originating operators are obliged to charge their end-users in accordance with their published retail price lists, which may be amended from time to time following due process.

**Q. 15 Do you have any views on the format of recorded announcements?**

28. Following extensive discussion at the NGN WG it has been concluded that the only feasible option is generic announcements to be played from 1 January 2022. eir would recommend that the wording of the proposed announcements in paragraph 181 are amended to remove *“Please check the number you are calling.”* The rationale for the change is that the caller has already been advised that the numbers are no longer in service and requesting the caller to check the number they called will only add confusion.

**Q. 16 Do you agree with ComReg’s proposal to introduce the need for a written end-user order as a RoU condition of use for 1800 and 0818 NGNs and do you agree with ComReg’s proposed text to reflect this in the Numbering Conditions?**

27. eir notes that this requirement has already been imposed in ComReg’s operation of the INA process. eir has no objection to the proposed text to update the Numbering Conditions to this effect.

**Q. 17 Do you agree with ComReg’s proposals to (a) insert a paragraph in Section 3.1 of the Numbering Conditions confirming ComReg’s acceptance that authorised undertakings may provide services to resellers in the market as described and (b) insert the definition of reseller in Appendix 11 of the Numbering Conditions?**

28. eir has no objection to the proposed amendments.

**Q. 18 Do you agree with ComReg’s proposal to retain the Geographic Number condition requiring the end-user’s premises to be physically located within the designated MNA for that number?**

29. eir agrees that the Condition should be retained taking into account end-user views regarding maintaining trust in geographic numbering.

**Q. 19 Do you agree that Non-Geographic Numbers (0818 Standard Rate and 1800 Freephone) provide a valid solution for Cloud Services?**

30. eir agrees that non-geographic numbers provide a valid option for Cloud Services, as do geographic numbers that are used in accordance with the Numbering Conditions.

**Q. 20 Do you have a view as to the need to retain the MNA concept?**

31. eir notes that the MNA system is effectively hard coded into its legacy network systems. Any change to the MNA regime in the near term would be very expensive. It may be appropriate to revisit this issue in a few years as eir's network modernisation programme nears completion.

**Q. 21 Do you agree with ComReg's assessment of the conditions around CLI and Number Portability in relation to the use of numbers for Cloud Services?**

32. eir agrees with ComReg's assessment that the current conditions around CLI and Number Portability appear fit for purpose in the context of supporting Cloud Services and a review is not merited at this time.

**Q. 22 Do you agree with ComReg's assessment of temporary numbers? Please give reasons for your answer highlighting any solutions that you think might support the introduction of temporary numbers.**

33. eir agrees with ComReg's assessment that geographic numbers should not be used as temporary numbers. It is not in the interest of anyone to undermine the trust embedded in the geographic numbering scheme evidenced in the consumer research undertaken by consultants on ComReg's behalf. The use of temporary numbers could raise issues if the purchaser has no means to contact the seller post transaction.

**Q. 23 Do you agree with the proposal that ComReg will continue to monitor developments in Cloud services at ECC/CEPT, to promote greater policy harmonisation for Cloud services across Europe?**

34. eir agrees that ComReg should monitor the development of harmonisation measures.

**Q. 24 Do you agree with ComReg's proposal to reserve 1,000 numbers in the number range 089 011 0000 to 089 011 0999 for drama use?**

35. eir agrees.

**Q. 25 Do you agree with ComReg's proposal to add the said text to paragraph 6 of Section 3.2 "Rights of Use Conditions", clarifying that trading of numbers is not permitted?**

36. eir has no objection to the proposed clarification text.

eir response to 21/28

**Q. 26 Are there any matters which you wish to raise as part of this consultation?**

37. eir has no additional points to raise at this time.

## Conor Mahon

---

**From:** David Humphreys [REDACTED]  
**Sent:** Friday 18 June 2021 14:51  
**To:** Conor Mahon  
**Cc:** Albert Redmond; XX WILLIAM MCCOUBREY  
**Subject:** Re - "Reference: Consultation 21/28 "Review of the Numbering Conditions of Use and Application Process"

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and believe the content is safe.

Hi Conor,

This afternoon I had a call with Albert to bring the below item to ComReg's attention. Following the Eircom Limited/Meteor Mobile Communications Limited response to consultation we were prompted to further consider the response to question 5. We need to highlight in particular implications for establishing entitlement to a number in the first instance before porting a number, through the current industry agreed porting process.

*Q. 5 Do you agree with ComReg's proposed implementation of relevant provisions of Article 106 of the EECC relating to provider switching and number portability?*

### Further Considerations:

In accordance with the current numbering conditions, operators have on occasion re-activated numbers for customers who seek to port their number to another service provider. Such requests are extremely rare and have not warranted the development of a specific procedure, as such ports can be achieved by provisioning the number on prepay service without any onerous contractual commitment and without any payment to the donor provider. However, this utilises the existing prepay service mechanisms to activate the number. This must entail a contract (albeit the lightest form of contract) with the end user. Furthermore, in the case of prepay unregistered accounts, in order to establish an entitlement to the number, the end-user will need to engage with their former service provider. When porting a prepay unregistered number, entitlement is established through the sending of a validation code to the phone number to be ported, which must of course be active at that point. In the case of a ceased prepay unregistered number, before activating the number, the entitlement to the number must be confirmed by the donor operator. This will involve the provision of the likes of regularly dialled numbers which the donor will have to identify among usage records. Hence our proposed amendment to the wording of section 7 to refer to a fixed duration contract (consistent with EECC terminology) and the proposed deletion of the remainder of that sentence, to cater for the validation of any claim to a former unregistered prepay number and to facilitate porting through the established industry process.

7. When a number is surrendered by an end-user or is otherwise recovered by the holder which assigned the number or by the undertaking to which the number was ported, the number shall thereupon be placed in quarantine for a period of 13 months and shall not be assigned to anyone other than the previous end-user during the 13-month period of quarantine. *In addition, the end-user retains the right to port the terminated number to another provider at any time during the quarantine period unless that right is renounced by the end-user. There shall be no conditions placed on an end-user to enter a fixed duration contract re-contract or make contact with the provider where the number is quarantined in order for that number to be ported.* The quarantine period may be waived if the previous end-user and the new end-user both consent to this in writing, and the holder for the number shall make such end-users aware of the consequences of waiving the quarantine period.

Regards,

David



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## 5: Gas Networks Ireland (“GNI”)

NON-CONFIDENTIAL





**Conor Mahon**

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**From:** Owen Wilson [REDACTED]  
**Sent:** Tuesday 11 May 2021 14:04  
**To:** Market Framework Consult  
**Cc:** Conor Ahern; Wayne Mullins; Aislinn Corkery (C); Karen Dunne; Albert Redmond; Conor Mahon; Gordon.Mooney@analysismason.com  
**Subject:** Reference: Consultation 21/28 "Review of the Number Conditions of Use and Application Process"

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FAO Conor Mahon

Reference: Consultation 21/28 "Review of the Number Conditions of Use and Application Process"

Dear Conor,

Please find below Gas Networks Ireland's responses to the above ComReg consultation. As part of the consultation process, ComReg issued a consultation paper 21/28 which covers, amongst other things, the extension of utility NGN emergency numbers. Section 3.3, Pages 37-46 of the document provides the detail on this topic. Gas Networks Ireland is satisfied that the detail provided in the paper is an accurate reflection of our interactions with ComReg to date.

The consultation process asks two questions in relation to the topic of utility emergency numbers:

Q8. Do you agree with ComReg's proposal to extend the operation of the utility emergency numbers in Figure 1 until 31 December 2023? Please explain the basis for your response in full and provide supporting information.

Q9. Do you agree with ComReg's proposal to conduct an evidence-based review in 2023 to determine if any further extended operation of any of the NGNs in Figure 1 is needed? Please explain the basis for your response in full and provide supporting information.

In relation to Question 8, Gas Networks Ireland supports the ComReg proposal to extend the operation of the listed utility emergency contact numbers. The reasons for this are the large number of long-life assets and other locations where these numbers are displayed and the risk associated with a caller attempting to call an "old" out-of-service emergency number and being unable to get through. GNI does not believe that the risk associated with a caller being unable to get through in the event of an emergency can currently be shown to be as low as is reasonably practicable and that to change numbers on these assets outside of their normal replacement lifecycle would incur significant cost which GNI believes would be a disproportionate burden on gas consumers. Details of gas emergency/ safety related calls and the number assets and estimated renumbering costs have been provided previously to ComReg in support of this position. GNI believes that the 2 year extension proposed by ComReg should provide a sufficient timeframe to establish consumer behaviour in relation to transitioning to new numbers and should therefore allow the risks associated with terminating these old NGNs to be established. GNI believes, however, that the NGNs should only be terminated when it has been shown that the risks associated with doing so are As Low As Reasonably Practicable (in line with the Commission for Regulation of Utilities ALARP guidance). The precautionary principle of the CRU ALARP guidance would require that the numbers be extended until such time as the risk can be shown to be ALARP. This is subtly different to the current proposal to only extend them until 31<sup>st</sup> December 2023 unless it is determined that a further extension is required.

In relation to Question 9, Gas Networks Ireland supports the ComReg proposal to conduct an evidence-based review in 2023, provided that the evidence-based review is conducted in accordance with the CRU ALARP Guidance. GNI believes that a Quantitative Risk Assessment, potentially combined with a Cost Benefit Analysis (depending on the

outcome of the QRA) would meet these requirements and would allow ComReg and the affected utilities to demonstrate that the decision to terminate these NGNs and the risks arising from it are ALARP, that the decision is compliant with duties imposed under relevant safety legislation and that the decision and any costs arising from it are thus proportionate.

There is one further area of potential interest to Gas Networks Ireland in the consultation paper: Section 3.4 (pages 46-51) discusses the possibility of making 1800 numbers available to call from outside Ireland. Q10-13 asks various questions about this.

Q13 asks: Are there any other issues relating to the potential introduction of international access to Irish 1800 Freephone numbers that ComReg should consider? Please explain the basis for your response in full and provide supporting information.

In response to Question 13: In principle, Gas Networks Ireland supports international access to Irish 1800 Freephone numbers in order that callers visiting or resident in Ireland who are using overseas mobile phones may easily contact, for example, utility emergency services that use 1800 numbers. This would apply particularly to UK/ NI mobile users in border counties and also visitors/ residents in Ireland who are availing of "roaming" via an overseas mobile operator. It would also potentially remove the requirement for organisations to provide an alternative geographic number for such callers.

I trust the above responses are clear, however if you have any questions on any of them, please feel free to contact me.

Regards,

Owen

**Owen Wilson** | *Networks Safety Manager*

**Gas Networks Ireland**

NSC, St. Margaret's Road, Finglas, D11 Y895



**Progress is natural, which is why we're moving Ireland towards a cleaner energy future.**

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## 6: Health Service Executive (“HSE”)

NON-CONFIDENTIAL



**Conor Mahon**

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**From:** Tadgh Buckley (Network Manager) [REDACTED]  
**Sent:** Thursday 13 May 2021 11:46  
**To:** Conor Mahon  
**Cc:** 'James Leahy'  
**Subject:** RE: [Restricted] Review of the Numbering Conditions of Use and applications Process - HSE Response

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and believe the content is safe.

Dear Conor,

As you are aware the HSE are the lead agency in addressing the Covid 19 pandemic and hence many projects have stalled - One of these has been this number change and we have not made the progress we should have. That being said we started with a list of 92 1850/1890 numbers and have broken these into specific categories – namely those that have a high visibility across acute and Community Health and a list of 70 that we have commenced a process of changing and it may be possible for us to get these changed by end of year.

We also have a block of 0761 numbers that are used for DDI across the South and South East (Acute and Community Care).

With regard to Point 149 on page 45 would it be possible to add the following numbers (this is not a definitive list) :

1850224477
1850302702
1850200776
1850211869
1850211774
1850302702
1890404020
1890499299
1890252919
1890252920
1890252929

1890100016
1890252563
1850767790
1850444925
1850777911
1850241850
1850420420
1850201203
1850636313
1890424555
1850400911

I hope this adds some clarity to my previous mail.

Regards,

The HSE's Office of the Chief  
Information Officer, Delivering



#eHealth4All

[www.ehealthireland.ie](http://www.ehealthireland.ie)

**Tadhg Buckley,**  
**GM Business Enterprise Solutions**  
Infrastructure and Technology



**HSE**

Áras Sláinte, Dennehy's Cross  
Wilton Road, Cork, Eircode T12 XRRO

Oifig an Phríomhoifigeach Faisnéise,  
**FSS**, Áras Sláinte, Crossaire Uí Dhuineacha  
Bóthair Wilton, Corcaigh, Eircode T12 XRRO,

## 7: Office of the Government Chief Information Officer (“OGCIO”)

NON-CONFIDENTIAL







Q. 7 Do you agree with ComReg's proposal for PPDR Numbering? Please explain the basis for your response in full and provide supporting information.

As stated in the consultation document the OGCI0 is responsible for the contract providing PPDR services to State agencies. The OGCI0 has engaged with the NGN working group extensively on this topic and welcomes the allocation of 089 numbers to ensure that the voice interconnects with the wider telephony network will continue to operate.

The timescales proposed should allow for the full migration from 076 to 089 numbers but are ambitious. This project will involve new number allocations to terminals which are embedded in day to day operations and such changes will need to be carefully planned and implemented. At present there are approximately 20,000 terminals that will need new numbers assigned. Numbers are assigned to a mix of individual users, vehicles and fixed terminals spread over more than ten Public Service Bodies. These numbers are used as part of complex systems used for Command and Control and Computer Aided Dispatch for An Garda Síochána, the National Ambulance Service and the Irish Prison Service.

The migration to 089 by the end of 2021 will be heavily dependent on having the numbers fully routable no later than the 30<sup>th</sup> of September. The OGCI0 is committed to dedicating resources to establish parallel running as quickly as possible but it must be stressed that this is not a simple change to make and should not be considered as such. Although on a surface level it might appear to be a case of simply "swapping" one number block for another this overly simplistic view does not reflect reality. This will require significant system alterations with a wide variety of users and third parties including Tetra Ireland and any supplier responsible for the delivery of the critical services highlighted in the second paragraph of this response.

Q. 8 Do you agree with ComReg's proposal to extend the operation of the utility emergency contact numbers in Figure 1 until 31 December 2023? Please explain the basis for your response in full and provide supporting information.

The OGCI0 supports this proposal. The OGCI0 has consistently raised the use of similar numbers by the HSE at the NGN working group. Although the OGCI0 is not responsible for the provision or operation of these numbers it is important to note that these numbers are critical to the provision of health services for Irish citizens and, given the Covid-19 pandemic, it is of national importance that the usage of such numbers is addressed.

We would expect that the HSE will make a submission to this consultation but in any event the OGCI0 suggests that Comreg makes contact with the HSE directly.



Q. 9 Do you agree with ComReg's proposal to conduct an evidence-based review in 2023 to determine if any further extended operation of any of the NGNs in Figure 1 is needed? Please explain the basis for your response in full and provide supporting information.

The OGCI supports this proposal.

## 8: Tesco Mobile (“Tesco”)

NON-CONFIDENTIAL





Conor Mahon  
Commission for Communications Regulation  
One Dockland Central  
1 Guild Street  
Dublin 1  
**BY EMAIL:** [conor.mahon@comreg.ie](mailto:conor.mahon@comreg.ie); [marketframeworkconsult@comreg.ie](mailto:marketframeworkconsult@comreg.ie)

11 May 2021

Dear Conor

**ComReg Consultation 21/28, “Review of the Numbering Conditions of Use and Application Process”**

I refer to ComReg’s numbering consultation (ComReg Doc. No. 21/28). Please see attached our response (set out in an Annex to this letter). Tesco Mobile commends the Numbering Division of ComReg on the timely completion of its numbering review. If you have any questions or would like to discuss, please do not hesitate to contact me.

With kind regards.

*(bears no signature as sent by email)*

**[MARK HUGHES]**

Legal and Regulatory Affairs Consultant

## ANNEX

**Q. 1 Do you agree with ComReg’s preliminary position on the assignment of numbers to non-ECS/ECN as permitted by Article 93(2) and Article 94(7) of the EECC? Please explain the basis for your response in full and provide supporting information.**

Yes, Tesco Mobile agrees with ComReg’s preliminary position, namely to: (i) consult further with industry on appropriate conditions of use attaching to numbers assigned to non-ECS should a use case be presented to it in the future; and (ii) only consider the assignment of 088 M2M numbers to non-ECS/ECN in the future. In the absence of a use case, this approach makes eminent sense.

**Q. 2 Do you agree with ComReg’s position that Article 93(4) of the EECC does not require further amendments to the Numbering Conditions document? Please explain the basis for your response in full and provide supporting information.**

Yes, Tesco Mobile agrees with ComReg’s position that Article 93(4) of the EECC does not require further amendments to the Numbering Conditions document.

**Q. 3 Do you agree with ComReg’s position that amendments are not presently required to the Numbering Conditions document in light of Article 93(6) or Article 106(6) of the EECC? Please explain the basis for your response in full and provide supporting information.**

Yes, Tesco Mobile agrees with ComReg’s proposed approach, namely investigation and a public consultation in Q3 2021. As a result, amendments are not presently required to the Numbering Conditions document in light of Article 93(6) or Article 106(6) of the EECC.

**Q. 4 Do you agree with ComReg’s position that no amendment to the Numbering Conditions in respect of Article 96 of the EECC is required? Please explain the basis for your response in full and provide supporting information.**

Yes, Tesco Mobile agrees with ComReg’s position that no amendment to the Numbering Conditions in respect of Article 96 of the EECC.

**Q. 5 Do you agree with ComReg’s proposed implementation of relevant provisions of Article 106 of the EECC relating to provider switching and number portability? Please explain the basis for your response in full and provide supporting information.**

Subject to the following comment, Tesco Mobile agrees with ComReg’s proposed implementation of relevant provisions of Article 106 of the EECC. In order to validate the porting request (and avoid customers being ported without their consent), the relevant number will have to be re-activated (which might involve contact with the customer) and the 1 working day porting window will have to take account of the amount of time that it takes to do this.

**Q. 6 Do you agree with ComReg’s proposed reflection in the Numbering Conditions Document of consequential amendments to Appendix 11 “Definitions” arising from the EECC? Please explain the basis for your response in full and provide supporting information**

Yes, Tesco Mobile agrees with ComReg’s proposed reflection in the Numbering Conditions Document of consequential amendments to Appendix 11 “Definitions” arising from the EECC.

**Q. 7 Do you agree with ComReg’s proposal for PPDR Numbering? Please explain the basis for your response in full and provide supporting information.**

Subject to the following comments, Tesco Mobile agrees with ComReg's proposal for PPDR Numbering. In relation to the proposal that OGCIO should continue to use 076 numbers for PPDR services beyond 31 December 2021 because OGCIO is currently dealing with a number of higher priority projects e.g. related to supporting communications in new vaccination centres, Tesco Mobile proposes that any limited exception justified by the Covid-19 pandemic be subject to a similar '2 year extension and review' process to that which is proposed regarding utility emergency contact numbers and that clarity be provided to operators as soon as possible and no later than 1 October 2021.

**Q. 8 Do you agree with ComReg’s proposal to extend the operation of the utility emergency contact numbers in Figure 1 until 31 December 2023? Please explain the basis for your response in full and provide supporting information.**

Tesco Mobile agrees with ComReg's proposal to extend the operation of the utility emergency contact numbers in Figure 1 until 31 December 2023, however, it is imperative that the details of the review framework are finalised by the end of 2021.

**Q. 9 Do you agree with ComReg’s proposal to conduct an evidence-based review in 2023 to determine if any further extended operation of any of the NGNs in Figure 1 is needed? Please explain the basis for your response in full and provide supporting information.**

Subject to our comments above, Tesco Mobile agrees with ComReg's proposal to conduct an evidence-based review in 2023 to determine if any further extended operation of any of the NGNs in Figure 1 is needed.

**Q. 10 On what basis do you consider international calls to Irish 1800 Freephone numbers should be facilitated (e.g. free to call or otherwise)? Please explain the basis for your response in full and provide supporting information.**

Tesco Mobile believes that international roaming calls to Irish 1800 Freephone numbers should be charged on a transparent basis pending wholesale regulation of cost, where appropriate. In particular, we note that international roaming calls to Irish 1800 Freephone numbers (as non-standard terminating numbers) are not subject to wholesale regulated rates.

**Q. 11 Do you consider that the cost of implementing international access to 1800 Freephone numbers would be reasonable for your organisation? Please explain the basis for your response in full and provide supporting information, clearly presenting any associated financial costs.**

Tesco Mobile does not consider that the cost of implementing international roaming access to 1800 Freephone numbers would be reasonable because the costs outweigh the benefit (see below) and have a disproportionate effect on Tesco Mobile as an MVNO. Implementing international roaming access to 1800 Freephone numbers would involve: (i) updating our retail roaming charging platform; (ii) amending the rating for Tap files cdrs and the wholesale rating table; (iii) testing out the service with our partners; (iv) opening the number range with our roaming partners and roaming solution provider; and (v) addressing the operational challenge of setting up the call. For example, if one of our customers were in Spain and called a 1800\*\* number, this number would be amended to +3531800\* or +353800\*\* or +001800\*\* as most European operators have a Smart Call Assist solution on their platform which corrects apparently misdialled numbers. The vendors of these Smart Call Assist solutions would need to engage with the Irish operators to amend the rules for this voice service. They would also have to roll out any solution to all their international operators, including inter-operator testing. All of this



assumes a willingness on the part of all these third parties to engage and invest in these changes. There will also probably be a resulting additional cost for Irish operators/customers.

**Q. 12 Do you foresee demand for international access to Irish 1800 Freephone numbers? Please explain the basis for your response in full and provide supporting information.**

Tesco Mobile does not foresee demand for international roaming access to Irish 1800 Freephone numbers because: (i) companies already publish alternate geographic numbers for 1800 numbers which can be accessed from abroad; and (ii) customers are aware and avail of this practice. A more pragmatic approach would be to mandate the provision and promotion of alternate geographic numbers when 1800 numbers are allocated to customers.

**Q. 13 Are there any other issues relating to the potential introduction of international access to Irish 1800 Freephone numbers that ComReg should consider? Please explain the basis for your response in full and provide supporting information.**

Tesco Mobile believes that the following issues should also be considered: (i) the call set up with the host operator; (ii) the transit routing of these calls; (iii) wholesale charging of the calls; and (iv) the fraud implications of opening this number range.

**Q. 14 Do you agree with ComReg's proposed text for the Numbering Conditions to take account of operator obligations arising due to the ceasing of number ranges? Please explain the basis for your response in full and provide supporting information.**

Yes, Tesco Mobile agrees with ComReg's proposed text for the Numbering Conditions to take account of operator obligations arising due to the ceasing of number ranges.

**Q. 15 Do you have any views on the format of recorded announcements? Please explain the basis for your response in full and provide supporting information.**

The following text proposed by ComReg would appear to be appropriate:

*"You have dialled an 1850 number. 1850 numbers are no longer in service. Please check the number you are calling. You have not been charged for this call."*

*"You have dialled an 1890 number. 1890 numbers are no longer in service. Please check the number you are calling. You have not been charged for this call."*

*"You have dialled an 076 number. 076 numbers are no longer in service. Please check the number you are calling. You have not been charged for this call."*

**Q. 16 Do you agree with ComReg's proposal to introduce the need for a written end-user order as a RoU condition of use for 1800 and 0818 NGNs and do you agree with ComReg's proposed text to reflect this in the Numbering Conditions? Please explain the basis for your response in full and provide supporting information.**

Yes, Tesco Mobile agrees with ComReg's proposal to introduce the need for a written end-user order as a RoU condition of use for 1800 and 0818 NGNs and do you agree with ComReg's proposed text to reflect this in the Numbering Conditions.

**Q. 17 Do you agree with ComReg's proposals to (a) insert a paragraph in Section 3.1 of the Numbering Conditions confirming ComReg's acceptance that authorised undertakings may provide services to resellers in the market as described and (b) insert the definition of reseller in Appendix 11 of the Numbering Conditions? Please explain the basis for your response in full and provide supporting information.**

Yes, Tesco Mobile agrees with ComReg's proposals to (a) insert a paragraph in Section 3.1 of the Numbering Conditions confirming ComReg's acceptance that authorised undertakings may provide services to resellers in the market as described and (b) insert the definition of reseller in Appendix 11 of the Numbering Conditions.

**Q. 18 Do you agree with ComReg's proposal to retain the Geographic Number condition requiring the end-user's premises to be physically located within the designated MNA for that number? Please explain the basis for your response in full and provide supporting information.**

Yes, Tesco Mobile agrees with ComReg's proposal to retain the Geographic Number condition requiring the end-user's premises to be physically located within the designated MNA for that number in order to avoid customer confusion.

**Q. 19 Do you agree that Non-Geographic Numbers (0818 Standard Rate and 1800 Freephone) provide a valid solution for Cloud Services? Please explain the basis for your response in full and provide supporting information.**

As an MVNO with limited resources, Tesco Mobile does not have sufficient information to answer this question.

**Q. 20 Do you have a view as to the need to retain the MNA concept? Please explain the basis for your response in full and provide supporting information.**

Tesco Mobile believes that ComReg should be guided by customer use of geographic numbers.

**Q. 21 Do you agree with ComReg's assessment of the conditions around CLI and Number Portability in relation to the use of numbers for Cloud Services? Please explain the basis for your response in full and provide supporting information.**

Yes, Tesco Mobile agrees with ComReg's assessment of the conditions around CLI and Number Portability in relation to the use of numbers for Cloud Services.

**Q. 22 Do you agree with ComReg's assessment of temporary numbers? Please give reasons for your answer highlighting any solutions that you think might support the introduction of temporary numbers.**

Yes, Tesco Mobile agrees with ComReg's assessment of temporary numbers.

**Q. 23 Do you agree with the proposal that ComReg will continue to monitor developments in Cloud services at ECC/CEPT, to promote greater policy harmonisation for Cloud services across Europe? Please explain the basis for your response in full and provide supporting information.**

Yes, Tesco Mobile agrees with the proposal that ComReg will continue to monitor developments in Cloud services at ECC/CEPT, to promote greater policy harmonisation for Cloud services across Europe.

**Q.24 Do you agree with ComReg’s proposal to reserve 1,000 numbers in the number range 089 011 0000 to 089 011 0999 for drama use? Please explain the basis for your response in full and provide supporting information.**

Yes, Tesco Mobile agrees with ComReg’s proposal to reserve 1,000 numbers in the number range 089 011 0000 to 089 011 0999 for drama use.

**Q. 25 Do you agree with ComReg’s proposal to add the said text to paragraph 6 of Section 3.2 “Rights of Use Conditions”, clarifying that trading of numbers is not permitted? Please explain the basis for your response in full and provide supporting information.**

Yes, Tesco Mobile agrees with ComReg’s proposal to add the said text to paragraph 6 of Section 3.2 “Rights of Use Conditions”, clarifying that trading of numbers is not permitted.

**Q. 26 Are there any matters which you wish to raise as part of this consultation? Please provide detailed reasoning supporting your submission.**

Tesco Mobile commends the Numbering Division of ComReg on the timely completion of its numbering review.

## 9: Three Ireland (Hutchison) Limited

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# **Numbering Conditions and Application Process (21/28)**

## **Response from Three**

**11<sup>th</sup> May 2021**



**Three.ie**

## 1. Introduction and Summary

Three welcomes the publication of document 21/28 by ComReg to consult broadly on changes to the Numbering Conditions and the application process. Within the last couple of years there have been several important developments in the market, the governing legislation, and the Irish numbering scheme. While ComReg has taken opinion on several of these developments through its Numbering Forum, it is timely to provide this broad opportunity for comment now.

We have provided a response to the consultation from three on a question-by-question basis in the following document.

## 2. The Numbering Forum

Overall, we have found that the Numbering Forum has worked well and has been an effective way to work through issues that are both broad and complex. It has facilitated the reaching of consensus in most cases, and where not it has helped reasoned decision-making.

## 3. Amendments Arising from the EECC

*Q. 1 Do you agree with ComReg's preliminary position on the assignment of numbers to non-ECS/ECN as permitted by Article 93(2) and Article 94(7) of the EECC? Please explain the basis for your response in full and provide supporting information.*

Yes, Three agrees that ComReg has adopted a sensible approach in this case. Demand for direct assignment of numbers has not emerged yet and it would not seem sensible to make amendments to the current process until there is at least a firm demand for such.

Until some use cases emerge, it is difficult to understand if other consequential changes would need to be made by either ComReg or operators to facilitate the effective functioning of direct assignment to end users, e.g. how would an end user ensure that their directly assigned number was correctly built and operational on all networks? In the meantime, the most likely use case would seem to be for IoT/M2M, where there are no particular factors related to use by humans to take into account (e.g. short numbers/memorable numbers for ease of use). The 088 number range provides adequate numbers to ensure there is adequate supply available for all IoT use for the foreseeable future, so there is no demand driven reason for direct assignment.

*Q. 2 Do you agree with ComReg's position that Article 93(4) of the EECC does not require further amendments to the Numbering Conditions document? Please explain the basis for your response in full and provide supporting information.*

Yes, we agree that this is adequately provided for already.

*Q. 3 Do you agree with ComReg's position that amendments are not presently required to the Numbering Conditions document in light of Article 93(6) or Article 106(6) of the EECC? Please explain the basis for your response in full and provide supporting information.*

Over the air provisioning marks a significant change to the means by which end users and their individual terminal equipment are provisioned with service. While bringing about a significant change for end-users, it will also require completely new support systems for operator networks and their supply chains. These warrant a specific consultation as outlined by ComReg, and Three will be happy to engage with that process. We agree that ComReg should await the outcome of that process rather than making changes to the conditions now.

*Q. 4 Do you agree with ComReg's position that no amendment to the Numbering Conditions in respect of Article 96 of the EECC is required? Please explain the basis for your response in full and provide supporting information.*

Yes – the 116000 number is already up and running in Ireland in a manner that will comply with the requirements of the EECC. For the Numbering Conditions there are no amendments needed. Other issues like resourcing of the services that are provided using these services are outside the scope of ComReg's numbering functions.

*Q. 5 Do you agree with ComReg's proposed implementation of relevant provisions of Article 106 of the EECC relating to provider switching and number portability? Please explain the basis for your response in full and provide supporting information.*

Article 106 of the EECC provides as follows:

“3. Where an end-user terminates a contract, Member States shall ensure that the end-user can retain the right to port a number from the national numbering plan to another provider for a minimum of one month after the date of termination, unless that right is renounced by the end-user.”

ComReg's proposed amendment to the Numbering Conditions states as follows:

*“In addition, the end-user retains the right to port the terminated number to another provider at any time during the quarantine period unless that right is renounced by the end-user. There shall be no conditions placed on an end-user to re-contract or make contact with the provider where the number is quarantined in order for that number to be ported.”*

There are several points to note regarding this proposal, particularly in relation to mobile numbering:



- At the moment, operators facilitate the porting of numbers which have recently terminated service, however this is achieved by manual intervention in the normal recycling process. This is adequate at the moment as it is generally only an exception when such a case arises. In addition, the longer a number has been out of service the less “value” there is to the end user in its re-activation;
- The current manual process is unlikely to be adequate for a situation where users have a right in the Numbering Conditions to port a number from termination on the same basis as a number that is in service – modifications to the porting systems will be needed so that these “ports” can occur automatically. Article 106 of the EECC would seem to imply that the porting of terminated numbers would occur on the same basis as an “in-service” number, which will require the support of automated processes.
- Verification of the “right to use” will still be required for terminated numbers. For pre-pay unregistered mobile numbers at present this is achieved (in most cases) by sending a PIN or authorisation code to the number. This will not be possible for numbers that have been terminated. It will be necessary to develop an alternative means of verification that will work in an automated environment.
- The EECC requires porting of numbers for a minimum of one month after termination. ComReg’s proposal goes much further and would impose a requirement on operators to port numbers “*at any time during the quarantine period*”. This obligation goes significantly beyond what is required in the EECC which does not require porting to be available for more than one month. While operators would be likely to facilitate porting after one month, it would be inappropriate for it to be mandatory for the full duration of the quarantine period.

For the reasons outlined above, Three does not support the amendment to the Numbering conditions at this time. ComReg should instead engage with operators (possibly through the Numbering Forum) to consider what amendment to the Conditions is appropriate and whether a transition period for systems development will be required.

*Q. 6 Do you agree with ComReg’s proposed reflection in the Numbering Conditions Document of consequential amendments to Appendix 11 “Definitions” arising from the EECC? Please explain the basis for your response in full and provide supporting information*

Yes, we generally agree with the amendments.

#### **4. Amendments Arising From The Numbering Forum**

##### **Transition from 076 to 089 for PPDR**

*Q. 7 Do you agree with ComReg’s proposal for PPDR Numbering? Please explain the basis for your response in full and provide supporting information.*

While we support the proposal to replace 076 numbers with a block in the range beginning with 089 3, we believe ComReg has underestimated the effort required to implement this change. In paragraph 101, ComReg states that:

*“The 089 mobile number range is already open on fixed and mobile networks in Ireland. The agreed industry lead-time for opening new number blocks on networks is three weeks. However, at the NGN WG, it was suggested that a three-month period for network preparations to support 089 for PPDR may be needed.”*

It should be noted that to the extent that the 089 number range is currently built on networks then it is built to operate as an existing mobile range operated by a commercial network operator. This includes routing, charging, and porting systems. In order to re-purpose this number block for PPDR, it will be necessary to undo any existing build and “carve-out” the number block for the OGCI0. This is completely different to the effort required to add a new block to an existing build and will require a significantly longer period. Three’s experience in opening numbering with a new build (e.g. 088) is that it can take up to a year for all operators to complete the process. While it might not take so long in this case, we are of the view that ComReg has significantly under-estimated the delivery time for the 089 3 block for PPDR.

It should be noted that no formal assignment of this block has yet been made by ComReg and no formal assignment can occur until ComReg has delivered its Decision following the current consultation. This is normally a prerequisite for the commencement of work to open a number block.

ComReg states that it expects the 089 number blocks to be open for routing on all fixed and mobile networks by 30 September 2021, and that there will be a period of parallel running from 31 October 2021 to 31<sup>st</sup> December. At this juncture, Three is of the view that this timetable is in jeopardy, and that ComReg should consider delaying the transition to 2022.

### **Utility emergency contact numbers**

ComReg proposes that the following individual number should continue in operation past the date for withdrawal from service of the 1850 and 1890 number ranges and up until 31<sup>st</sup> December 2023:

<i>Utility</i>	<i>Emergency contact number</i>
<i>ESB Networks (ESBN)</i>	<i>1850 372 999</i>
<i>Gas Networks Ireland (GNI)</i>	<i>1850 20 50 50 1850 42 77 47 1850 211 615</i>
<i>Irish Water (IW)</i>	<i>1850 278 278 1890 278 278</i>

*Q. 8 Do you agree with ComReg's proposal to extend the operation of the utility emergency contact numbers in Figure 1 until 31 December 2023? Please explain the basis for your response in full and provide supporting information?*

Yes, Three agrees with the proposal for extended use of these numbers, however as explained further below, 31<sup>st</sup> December is not a suitable date for the implementation of number changes as it falls within the annual mobile network freeze. ComReg should amend the cessation date by either bringing it forward or backward by 1 month.

*Q. 9 Do you agree with ComReg's proposal to conduct an evidence-based review in 2023 to determine if any further extended operation of any of the NGNs in Figure 1 is needed? Please explain the basis for your response in full and provide supporting information.*

Three is of the view that a definite end-date for the use of these numbers should adopted. This would provide certainty for all parties concerned.

#### **International access to 1800 numbers**

*Q. 10 On what basis do you consider international calls to Irish 1800 Freephone numbers should be facilitated (e.g. free to call or otherwise)? Please explain the basis for your response in full and provide supporting information.*

*Q. 11 Do you consider that the cost of implementing international access to 1800 Freephone numbers would be reasonable for your organisation? Please explain the basis for your response in full and provide supporting information, clearly presenting any associated financial costs.*

*Q. 12 Do you foresee demand for international access to Irish 1800 Freephone numbers? Please explain the basis for your response in full and provide supporting information.*

*Q. 13 Are there any other issues relating to the potential introduction of international access to Irish 1800 Freephone numbers that ComReg should consider? Please explain the basis for your response in full and provide supporting information.*

We note and agree that in most cases it might be technically possible to route inbound international calls to Freephone numbers for termination in Ireland. There are many associated complicating factors though which mean that it might not be feasible in some cases. For this reason, the Numbering Conditions should permit but not require such access.

As ComReg has correctly recognised, there are many uncertainties in relation to charges and billing for inbound international calls to 1800 numbers:

- Internationally originated calls to Irish Freephone numbers would not be free to the caller. We have doubts about whether it would be feasible to introduce pre-call announcements to alert users in these call cases. It might be the case that the benefit of being able to make the call outweighs the risk that a caller is surprised to find that there is a charge for such call.
- For mobile networks, these calls will generate roaming charges. It is not feasible to pass-on these charges to call recipients and so the charges would need to be included on customer retail bills.
- While we note ComReg's position regarding the Roaming Regulation, certainty would be needed that there would be no conflict between the charges and the Regulation before operators could consider providing access.
- We note ComReg's position that charges for these calls should appear on customer bills and we agree with this in principle, however other interested parties might have reason to disagree with this and so we await the responses received to this consultation in this regard.

Three is not convinced that there is a demand for international access to Irish Freephone numbers. Most utilities, banks, and service businesses push their customers towards internet-based services for support. They also provide an Irish geographic alternative for customers to use in most cases if they are calling from abroad, e.g.

[AIB Contact Details | AIB](#)

[Freephone Emergency Numbers | Help Centre | Bank of Ireland Group Website](#)

[Contact Us \(esb.ie\)](#)

[Contact Ireland's Leading Health Insurance Provider - VHI](#)

## Number Changes – Obligations on Operators

In relation to changes to the numbering scheme (where ComReg has undertaken a significant change that effects a range of in-service numbers or numbers of a particular type) ComReg has proposed the following text for the Numbering Conditions:

*a) there shall be a period following the provision of a new number and before the ceasing of the number range during which the customer can use the original number or the new number and the charge for calling the original number shall remain the same while the cost of calling the new number shall be the operator's published rates for calling that number;*

*b) when the period of parallel running of the original and new number ends, or after the ceasing of the number range, in-call announcements shall be put in place to inform callers that (1) the original number has been replaced and is no longer in use, and (2) make adequate provision to direct the caller to the new number; and*

*c) there shall be no charge whatsoever for any call made to a number which has been replaced and is no longer in effect.*

For cases where number ranges are to be ceased, ComReg proposes the following:

*“Ceasing of Number Ranges – Undertakings shall inform their customers of any requirement to change number sufficiently in advance of the ceasing of the number range, and undertakings shall take appropriate measures in respect of such number changes to include the following . . .”*

*Q. 14 Do you agree with ComReg’s proposed text for the Numbering Conditions to take account of operator obligations arising due to the ceasing of number ranges? Please explain the basis for your response in full and provide supporting information.*

While in general Three agrees with ComReg’s text for the Numbering Conditions there are some additional considerations that should be taken into account. ComReg itself should take a leading role to inform the public of number changes, together with operators/service providers. While recorded announcements are useful in cases where callers can be given simple instructions on how to re-dial in cases where a number has been changed, this can only feasibly work at a network level where there is a standard change that applies across an entire number range. Recent changes like the withdrawal of 1850/1890 do not lend themselves to this kind of re-direction as there is no consistent instruction that can be given. In this case, end-users (call recipients) should be encouraged to introduce their own individual announcements prior to the change.

In general, we do not agree that it is appropriate to direct callers to Directory Enquires for information regarding number changes, primarily because of the cost of using those services. We are also of the view that the on-line Phonebook will be of limited use in these cases.

*Q. 15 Do you have any views on the format of recorded announcements? Please explain the basis for your response in full and provide supporting information.*

We should aim for short and simple messages on the withdrawal of the NGN numbers at the end of this year. It is worth noting that there has been a significant period of notice for this change, and that most callers should be familiar with the change in advance of the withdrawal. For the most part, the function of the announcements in this case will be merely to remind callers of the change.

Ideally, we would prefer a single announcement that would cover all of the NGN cases, e.g.:

*“The number you have dialled is from a number range that has been withdrawn from service and replaced. Please call again using the new number. You have not been charged for this call.”*

The text (or something similar) would allow the use of a single announcement for all call cases. We do not see any particular advantage in having a separate announcement for each number range in this changeover as there is no “rule” to map an existing number range to a new one.

## Customer Validation

*Q. 16 Do you agree with ComReg's proposal to introduce the need for a written end-user order as a RoU condition of use for 1800 and 0818 NGNs and do you agree with ComReg's proposed text to reflect this in the Numbering Conditions? Please explain the basis for your response in full and provide supporting information.*

Yes, we agree with ComReg's proposal here.

## Reseller Services

*Q. 17 Do you agree with ComReg's proposals to (a) insert a paragraph in Section 3.1 of the Numbering Conditions confirming ComReg's acceptance that authorised undertakings may provide services to resellers in the market as described and (b) insert the definition of reseller in Appendix 11 of the Numbering Conditions? Please explain the basis for your response in full and provide supporting information.*

Yes, we generally agree with ComReg's proposal here. We do not have any comment to make on the specific text to be included in the conditions.

## Geographic and Cloud

*Q. 18 Do you agree with ComReg's proposal to retain the Geographic Number condition requiring the end-user's premises to be physically located within the designated MNA for that number? Please explain the basis for your response in full and provide supporting information.*

*Q. 19 Do you agree that Non-Geographic Numbers (0818 Standard Rate and 1800 Freephone) provide a valid solution for Cloud Services? Please explain the basis for your response in full and provide supporting information.*

In the first place, it should be noted that Authorisations to provide electronic Communications services should be technologically neutral, and no restriction should be placed on the method of service delivery. That said, there particular characteristics of different services that allow them to be grouped together in a way that helps consumers, and in some cases, this is also necessary for service delivery – e.g. the distinction between Geographic, Mobile and NGN services is clearly beneficial for both consumers and service providers. ComReg's research shows that businesses and consumers appear to value and trust Geographic Numbers to a significant extent and believe that it is important to know the geographic location when making or receiving a call, particularly if that call is in their local area. For this reason we need to maintain some association between location and numbers within Geographic numbers. It will be necessary to maintain the geographic condition, although it would seem to be sensible to have fewer but larger areas.

It will be possible to provide all currently existing services and some new ones from the cloud and this will bring benefits in efficiency and flexibility. This will eventually eliminate the

necessity for some of the distinctions between different service type, reducing the need for different number ranges. There are some service distinctions that should be retained though because they are beneficial to end-users even though they might no longer be required for technology reasons.

Cloud technology will also allow provision of new services that may not “fit” with the existing service distinctions in the current numbering scheme.

For now, we agree that the Non-Geographic Numbers provide a solution for cloud-based services, however we expect that all services might be cloud-based to some extent in future. New cases may well emerge that require numbers from outside these ranges.

*Q. 20 Do you have a view as to the need to retain the MNA concept? Please explain the basis for your response in full and provide supporting information*

The MNA structure is now outdated and should be removed. As ComReg has rightly stated (in different terms) it is a relic of a time when all voice calls were made on the fixed network and there was distance-based tariffs. This is no longer relevant today. We note that ComReg’s consumer survey indicates that there is still some value in the geographic indication that Geographic numbers provide, however we do not believe this extends down to the MNA. Most MNAs have several different non-contiguous sub-ranges in use making it difficult for a consumer to easily know which numbers are associated with which MNA.

The use of MNAs drives inefficiency in the numbering scheme as each service provider must carry numbers in each area, including spare/unused numbers. We no longer need to have 106 different geographic numbering areas in a small country. ComReg should now begin the process to simplify the Geographic number ranges and at the minimum the MNAs should be expanded up to the Geographic Access Code area. In the longer term, ComReg should also seek to reduce the number of Access Codes also.

*Q. 21 Do you agree with ComReg’s assessment of the conditions around CLI and Number Portability in relation to the use of numbers for Cloud Services? Please explain the basis for your response in full and provide supporting information.*

Yes, we agree with ComReg’s assessment on this matter.

*Q. 22 Do you agree with ComReg’s assessment of temporary numbers? Please give reasons for your answer highlighting any solutions that you think might support the introduction of temporary numbers.*

Temporary numbers would provide businesses with more agile options for providing business e.g. Pop Up shops, deliveries, etc. so for that reason their use should be considered.

*Q. 23 Do you agree with the proposal that ComReg will continue to monitor developments in Cloud services at ECC/CEPT, to promote greater policy harmonisation for Cloud services across Europe? Please explain the basis for your response in full and provide supporting information.*

Yes, we agree with this proposal.

*Q. 24 Do you agree with ComReg's proposal to reserve 1,000 numbers in the number range 089 011 0000 to 089 011 0999 for drama use? Please explain the basis for your response in full and provide supporting information.*

Yes, we agree with ComReg's proposal here. We note that the requirement is only for 1,000 numbers, however we note that this will quite likely effect the entire 100,000 block of numbers.

## **Number Trading**

ComReg's proposal is to add the text underlined below into the existing condition:

*"No charge of any kind shall be made for transferring a right of use for a number, other than a charge limited to covering the associated administrative costs. For clarity, trading of numbers is not permitted."*

*Q. 25 Do you agree with ComReg's proposal to add the said text to paragraph 6 of Section 3.2 "Rights of Use Conditions", clarifying that trading of numbers is not permitted? Please explain the basis for your response in full and provide supporting information.*

We agree with the addition to the current condition.

*Q. 26 Are there any matters which you wish to raise as part of this consultation? Please provide detailed reasoning supporting your submission.*

ComReg has proposed 31<sup>st</sup> December as the date for switchover of services from the 1850, 1890, and 076 number ranges. This is traditionally a busy period for Mobile service providers and it is normal to implement a network freeze from early/mid-December to early January to ensure service continuity. It should also be noted that December 31<sup>st</sup> is still a busy day (traffic wise) for all network operators, and a day when the full complement of support staff might not be available. While traffic on NGNs might be low on 31<sup>st</sup> December, Three does not believe it is an appropriate time to implement any network change,



including a number change. ComReg should consider moving this date forward or backward by 1 month.

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## 10: Twilio Ireland Limited ("Twilio")

NON-CONFIDENTIAL





*Non-Confidential Version*

# ***Review of the Numbering Conditions of Use and Application Process***

*Twilio's Response to the Consultation by the Commission for Communications Regulation  
Published on 30 March 2021 (ComReg 21/28)*

11 May 2021



## 1. About Twilio

- 1.1 Twilio is a leading global CPaaS provider and is registered as an Electronic Communications Service (**ECS**) Provider in the Republic of Ireland. Twilio provides services to more than 235,000 enterprises globally and powers more than 1 trillion interactions between them and their customers every year.
- 1.2 Twilio's software allows enterprises to communicate with their customers over voice, SMS, messaging, or email thanks to the communications capacity that companies have added into applications across a range of industries, from financial services and retail to healthcare and non-profits.
- 1.3 For instance, Twilio powers the communications for New York City's contact tracing initiative. The services enable city authorities to communicate with COVID-19 patients, educate them on the virus, and identify their close contacts through self-reporting. The platform also provides messaging-based alerts using Twilio Voice, SMS, email or WhatsApp that prompt patients to fill out secure surveys on their symptoms.
- 1.4 Other customers include Irish and international brands. Many of Twilio's customers are also small and medium-sized enterprises and Twilio's non-profit arm, Twilio.org, supports charitable organizations to deliver their communications needs.
- 1.5 Within the Republic of Ireland, Twilio serves a number of customers, some examples of which are set out below:
  - Irish startup WhatClinic is a website for consumers to find, compare and book healthcare services. With Twilio, it tracks conversion rates in over 160 countries.
  - The AirBnB subsidiary Luckey, a host management company managing everything from booking to cleaning to meeting the next guest, has decided to use Twilio's fully-fledged contact center services due to their initial positive experience with Twilio voice communications.
  - Crisis Text Line a free, 24/7, confidential messaging service for people in crisis, funded by the Health Service Executive (**HSE**) that quickly connects teens and adults struggling with suicidal thoughts, addiction, and other crises with counselors trained to help through a Free Text Short Code.

## 2. Executive Summary

- 2.1 Twilio welcomes the opportunity to provide feedback on the Commission for Communications Regulation's (**ComReg**) consultation on the Review of the Numbering Conditions of Use and Application Process published on 30 March 2021 (**Consultation**).



- 2.2 Phone numbers are key to our customers and the Communications Platform as a Service (**CPaaS**) we provide them. Our customers rely on phone numbers to identify themselves to the persons they call and message. Parties receiving calls and messages want to know that the person that is calling and messaging them are who they say they are. Our customers rely on phone numbers to support their businesses and brands. Twilio is acutely aware that in order for our customers' businesses and brands to flourish trust in phone numbers is required by the entire ecosystem, businesses that make calls and send messages, persons that receive calls and messages and electronic communications services providers that facilitate these exchanges.
- 2.3 The Numbering Conditions of Use and Application Process (**Numbering Conditions**) is the essential document that lays out the rules and regulations on the usage and applications for phone numbers.
- 2.4 Twilio welcomes the fact that ComReg reviews the Numbering Conditions approximately every 2 years in order to take into consideration, amongst other things, changes to industry process, new products and market developments. This review is critical to ensuring that the Numbering Conditions support innovation in the Republic of Ireland.
- 2.5 In this response, Twilio does not answer every question posed by ComReg rather it addresses those questions where Twilio has comments or concerns.
- 2.6 Please do not hesitate to refer any questions or remarks that may arise as a result of our comments to:

Twilio Ireland Limited  
 Attention: Twilio Global Regulatory Affairs  
 Address: 25-28 North Wall Quay, Dublin 1, Ireland  
 Email: regulatory-notices@twilio.com

### 3. Response to Questions

*Q.1. Do you agree with ComReg's preliminary position on the assignment of numbers to non-ECS/ECN as permitted by Article 93(2) and Article 94(7) of the EECC?*

- 3.1 Twilio supports ComReg's preliminary position of not extending the assignment of numbers to non-ECS/ECN entities by ComReg at this time. The lack of demand from non-ECS/ECN entities to be assigned numbers, that is identified by ComReg in the Consultation, supports the notion that such assignments are not required at this time. Twilio does believe that it is important for ComReg to continue to monitor developments in this area in the event a change of position is required prior to the next review of the Numbering Conditions.



*Q.5. Do you agree with ComReg's proposed implementation of relevant provisions of Article 106 of the EECC relating to provider switching and number portability?*

3.2 Twilio notes that Article 106 (3) of the EECC states the following:

*Where an end user terminates a contract, Member States shall ensure that the end-user can retain the right to port a number from the national numbering plan to another provider for a minimum of one month after the date of termination unless that right is renounced by the end user.*

3.3 In the Consultation, ComReg notes that the quarantine period in Ireland is 13 months and that current industry practice allows end users to port their number during this period. As a result of this industry practice ComReg proposes to amend the Numbering Conditions to read as follows:

*In addition, the end user retains the right to port the terminated number to another provider at any time during the quarantine period unless that right is renounced by the end user. There shall be no conditions placed on an end user to re-contract or make contact with the provider where the number is quarantined in order for that number to be ported.*

3.4 Twilio notes that the period of 13 months to allow a customer to port a number after they have terminated their service is extremely long, particularly when compared with the 1-month minimum period set out in Article 106 of the EECC. Whilst it may be voluntary industry practice to allow for a longer period to port numbers upon termination of the contract, Twilio does not agree that a 13-month period should be mandated within the Numbering Conditions.

3.5 In the event that ComReg believes that a period of greater than 1 month is needed, we believe that such a period should be based on evidence on how many customers take advantage of the right to port their numbers after 1 month following termination of their service. In Twilio's experience if a customer is going to port a number it occurs prior to terminating the contract or relatively soon after the contract is terminated. Twilio believes that any change to the Numbering Conditions (as opposed to voluntary industry practice) that departs from the EECC to such an extent should be evidence based.

3.6 Twilio notes that other countries, such as the United Kingdom and Finland, for example have granted end-users the right to port their numbers within the 1 month. Twilio also believes that allowing a customer to port quarantined numbers up to the end of the 13th month quarantine period contradicts the requirement to efficiently use numbers. In particular, if the right to port numbers during the 13-month quarantine period is enshrined



in the Numbering Conditions, ECS/ECN would not be able to guarantee that those numbers will be returned into inventory and in their planning for number management are therefore likely to seek new numbers from ComReg that may in the end be unnecessary.

- 3.7 Twilio also notes that requiring ECS/ECN to allow customers to port numbers during the 13-month quarantine period would require them to retain personal data on their customers for a considerable period of time. This, coupled with the fact that in Twilio's experience most customers port a number prior to terminating the contract or relatively soon after the contract is terminated, seems to go against the spirit of the General Data Protection Regulation (**GDPR**).
- 3.8 We urge ComReg to reconsider allowing end-users to port numbers on termination of their contract for a period of either 1 or 3 months after the date of termination versus the 13 months currently being proposed by ComReg.

*Q.10. On what basis do you consider international calls to Irish 1800 Freephone numbers should be facilitated (e.g. free to call or otherwise)?*

- 3.9 Twilio supports the opening up of international access to Irish 1800 Freephone numbers as this would give our customers additional capabilities. Notwithstanding the same, Twilio believes that there are a number of issues that need to be resolved prior to this being mandated and that this topic is worthy of further consultation.
- 3.10 On pricing, Twilio suggests that if international calls to Irish 1800 Freephone numbers are to be facilitated, they should be on a paid basis, given that there are likely to be costs involved for operators not only in ensuring international access but to route the international traffic on a call-by-call basis.

*Q.11. Do you consider that the cost of implementing international access to 1800 Freephone numbers would be reasonable for your organisation?*

- 3.11 As indicated in our response to Question 10, Twilio supports the idea of allowing international access to 1800 Freephone numbers in Ireland, but as the matter currently stands, it is not possible for Twilio to calculate the costs of implementing international access to 1800 Freephone numbers and whether those costs would be reasonable.
- 3.12 The difficulty in calculating the costs to allow international access to 1800 Freephone numbers is that the costs of implementing the international access will vary according to





the exact requirements that are imposed by ComReg, particularly around the deadline for this to be introduced, the jurisdictions covered and the accompanying requirements.

- 3.13 Twilio notes that at the moment, the Consultation does not clearly indicate how extensive the mandate for international access to 1800 Freephone numbers would be, as the Consultation states that:

*ComReg is of the view the necessary changes could at least be applied in those territories most frequented by Irish consumers (e.g., Member States visited by consumers for business reasons and holidays) and markets most likely to be buying online from Ireland.*

It is not therefore clear from what countries customers would be able to access 1800 Freephone numbers and whether ComReg is considering that this mandate for international access would go further than the European Union. Whilst the legislative requirement under the EECC is limited to the European Union the reference to “markets most likely to be buying online from Ireland” perhaps suggests that ComReg is considering a broader mandate given that this description could potentially include markets such as the United Kingdom, Australia or the United States which have strong ties to Ireland. Given this, Twilio considers that there is considerable uncertainty about which jurisdictions international access to 1800 Freephone Numbers will apply to.

- 3.14 The questions around the accompanying requirements for this international access will also affect the cost. For example, if calls are to be charged and therefore are required to appear on customer’s bills (as opposed to non-chargeable calls which do not) this may require additional billing development work.

*Q.12. Do you foresee demand for international access to Irish 1800 Freephone numbers?*

- 3.19 ComReg has stated in the Consultation that:

*A significant new use of 1800 numbers is on online platforms, as described in section 4 of this document. One example of such use is GoogleAds platform which uses a “Click to Call” button to establish communication between a consumer and a business. For this and other similar applications, it seems reasonable to ComReg that many businesses based in Ireland will want to target their online advertising beyond Ireland, so demand for international access is likely to grow very quickly.*

- 3.20 Twilio believes that having access to 1800 Freephone numbers from abroad would be beneficial to Irish business and our customers and we therefore support ComReg’s desire to open international access to 1800 Freephone numbers. In conjunction with



this however Twilio believes that 1800 Freephone numbers should be easier to obtain (see comments in response to Question 16).

*Q.13. Are there any other issues relating to the potential introduction of international access to Irish 1800 Freephone numbers that ComReg should consider?*

- 3.21 Whilst Twilio supports the introduction of international access for 1800 Freephone numbers it believes that this introduction is a complex one and that there are a number of issues to further consider, particularly around the implementation timing, costs, consequences of granting such access as well as demand. Twilio believes that a separate consultation on this topic is required not only to explore issues of cost and demand but also to ensure that all technical considerations have been considered.

*Q.14. Do you agree with ComReg's proposed text for the Numbering Conditions to take account of operator obligations arising due to the ceasing of number ranges?*

- 3.22 Twilio finds it surprising that this requirement is only now being proposed. ComReg's proposed requirement would leave companies with an implementation period of just a little over six months before 1 January 2022. Given that ComReg have not provided any robust evidence to support the need for this requirement, Twilio suggests that it is hard to see it as proportionate.
- 3.23 In addition, Twilio also queries how these requirements would be applied in practice for the future cessation of number ranges. In the Consultation, ComReg notes that the requirement to "inform their customers of any requirement to change number sufficiently in advance of the ceasing of the number range" will vary on a case-by-case basis and should be made clear to industry as part of any Decision to cease number ranges. Twilio also notes that it is unclear what the new requirement of "adequate provision to direct the caller to the new number" would mean in particular circumstances. At the moment this appears to be a very open-ended obligation and Twilio notes that very little guidance is given to industry in the consultation. Will this also be decided in any future decision to cease number ranges?

*Q.15. Do you have any views on the format of the recorded announcements?*



- 3.24 Twilio does not believe that the proposed announcements will aid customer understanding as they provide no guidance on how a customer should check the number. Given the limited information that can be provided in a recorded voice announcement, Twilio queries whether an announcement is the best mechanism for providing this information and whether these proposed announcements have been subject to customer research in order to understand how meaningful they are to customers and whether customers view these announcements as the best way to convey this information.
- 3.25 Twilio suggests that at the very least if an announcement was going to be made it should direct people as to how to find the alternative number with something along the following lines "X numbers are no longer in service. Please check online with the organisation you were trying to call for their new number. You have not been charged for this call."
- 3.26 Twilio would encourage ComReg to carry out adequate consumer research on this issue as part of any future Decisions it may take to withdraw numbering resources.

*Q.16. Do you agree with ComReg's proposal to introduce the need for a written end user order as a RoU condition of use for 1800 and 0818 NGNs and do you agree with ComReg's proposed text to reflect this in the Numbering Conditions?*

- 3.27 Twilio understands that ComReg's desire to introduce the need for a written end user order as an RoU condition of use for 1800 and 0818 NGNs is to avoid the situation of operators hoarding these numbers. At the same time however, Twilio believes that the requirement for a written end user order is too restrictive. Twilio notes that customers will often be discussing their needs with operators verbally before any written order or contract is entered into and that in the case of large customers, contractual negotiations and therefore a finalised written order may take considerable time due to matters completely unrelated to the customer's request for an 1800 or 0818 number. In order to be able to act promptly for the customer, Twilio suggests that it should be sufficient to be able to act on a verbal order. Therefore, Twilio considers it unreasonable that there should be a requirement for a written order. In addition, Twilio also notes that it is not clear how the requirement for a written order would operate in environments where a customer can order a number on an electronic platform. What would constitute the written order in that case?
- 3.28 Twilio suggests that instead of requiring a written order, it should be sufficient when applying for the number that the operator warrants that it is requesting the number on behalf of an identified end-user and provides that end user's name. If ComReg is concerned that this approach would not be sufficient it could for example think about other ways of ensuring that these numbers are used promptly and not hoarded.



*Q.17. Do you agree with ComReg’s proposals to (a) insert a paragraph in Section 3.1 of the Numbering Conditions confirming ComReg’s acceptance that authorised undertakings may provide services to resellers in the market as described and (b) insert the definition of reseller in Appendix 11 of the Numbering Conditions?*

3.29 Twilio welcomes ComReg’s recognition of the value of resellers within the eco system and their role in providing competition. Twilio notes ComReg’s proposal to clarify within the Numbering Conditions that “the number holder is responsible for the rights of use conditions that attach to those numbers as set out in Section 2 (a) of the Numbering Conditions.” Twilio welcomes the clarification of the responsibilities of resellers and number holders.

3.30 Twilio also supports ComReg’s proposal to introduce a definition of reseller.

*Q.18. Do you agree with ComReg’s proposal to retain the Geographic Number condition requiring the end-user’s premises to be physically located within the designated MNA for that number?*

3.31 Please see Twilio’s response to Question 20.

*Q.19. Do you agree that Non-Geographic Numbers (0818 Standard Rate and 1800 Freephone) provide a valid solution for Cloud Services?*

3.32 Please see response to Question 20

*Q.20. Do you have a view as to the need to retain the MNA concept?*

3.33 Twilio will address Question 18 - 20 together as we believe that they are linked. Twilio welcome’s ComReg’s discussion and positive comments about cloud-based communications and its desire to help facilitate them. ComReg’s desire to help facilitate cloud based communications, however, does not extend to removing or lessening the



requirement that end-users residential/business premises be located within the designated Minimum Numbering Area (**MNA**) for that Geographic Number. While we believe that most end-users are aware of some of the 49 Area Codes, very few end users are aware of the full 106 MNAs. In fact, the survey conducted by Behavior & Attitude Limited for ComReg seems to have focused exclusively on Area Codes and not MNA.

3.33 Twilio notes that other countries such as Sweden, France Switzerland, Norway and Australia have moved away or are in the process of moving away from the requirement to strictly link Geographic Numbers within designated geographic areas due to amongst other things the evolution of new products and technologies. Twilio, therefore, urges ComReg to consider eliminating the linking of Geographic Numbers to geographic areas the phases that could be used are as follows:

- **Phase 1** - Replace an MNA system that was based on based on Telecom Eireann's exchange area boundaries with Area Codes;
- **Phase 2** - Allow end users to port numbers between Area Codes; and
- **Phase 3** - Allow end users to request numbers if they have a business or residential premise located in the Republic of Ireland.

3.34 Twilio also believes that whilst 0818 and 1800 freephone numbers are useful for certain cloud-based use cases they do not work for all cloud-based use cases. Twilio notes that there is actually very little that separates Cloud phone systems from business VoIP operators with providers of both offering essentially the same phone access. As such, business VoIP operators and cloud communications providers should equally have access to Geographic Numbers to ensure that both eco-systems continue to thrive and grow.

*Q.21 Do you agree with ComReg's assessment of the conditions around CLI and Number Portability in relation to the use of numbers for Cloud Services?*

3.35 Twilio welcomes ComReg's analysis in paragraphs 260 - 264 of the Consultation and its recognition of the benefits of these use cases and its acceptance of the privacy enhancement case in particular in paragraph 261 as not raising any concerns around the use of CLI. All of the use cases mentioned in this section deliver benefits not only to Twilio's customers but to the public more widely and Twilio would suggest that as part of the introduction to the Numbering Conditions, ComReg should repeat this material as guidance so that it is clear in future that ComReg finds these use cases acceptable. Twilio would be happy to engage in any further discussions that might be necessary with ComReg on these use cases.



- 3.36 In relation to ComReg's position in relation to number portability, whilst Twilio agrees that the ability to switch provider underpins competition, it is also clear that part of the reason behind the introduction of portability was to allow customers to keep numbers that were meaningful to them or where replacing them would cause disruption to customers. While Twilio agrees that the numbers used for click to call cases or privacy enhancement cases can be ported by a customer, Twilio suggests that there is less intrinsic value to the customer of the numbers they are using in these cases. Twilio would therefore argue that in such cases there should be a consideration of whether porting rules could be relaxed. As Vodafone has suggested in its Cloud based paper, the requirement to allow for porting of numbers could potentially be relaxed where a number of criteria such as "the number not having a special status for the customer, the customer being a business customer and the customer agreeing to waive their right to portability existed.

*Q.23 Do you agree with the proposals that ComReg will continue to monitor developments in Cloud services at ECC/CEPT, to promote greater policy harmonisation for Cloud services across Europe?*

- 3.37 Twilio welcomes ComReg's proposal to engage in discussions at the ECC/CEPT level on cloud services and would hope that ComReg would be a powerful advocate for good progressive practices on the use of phone numbers by cloud services including putting forth its positions of acceptance of the various use cases outlined in ComReg's consultation document. Twilio remains at the disposal of ComReg to provide any further assistance or advice at any appropriate time in order to allow ComReg to participate meaningfully in any such ECC/CEPT discussion.

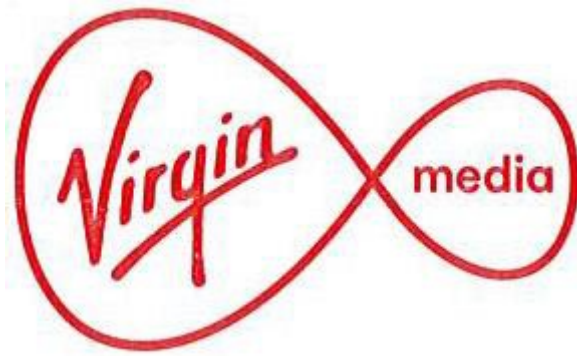


## 11: Virgin Media Ireland Limited (“Virgin Media”)

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## **Virgin Media response to:**

Consultation: Review of the Numbering Conditions of Use and Application Process

ComReg 21/28

11<sup>th</sup> May 2021

## Summary

Virgin Media Ireland Limited (**'Virgin Media'**) welcomes the opportunity to respond to ComReg's Consultation (**'the Consultation'**) on its Review of the Numbering Conditions of Use and Application Process (**'ComReg 21/28'**).

Virgin Media welcomes the Consultation and has responded to ComReg's consultation questions in the next section. Note Virgin Media does not have comments at this time in relation to any questions not referenced.

## Response to Consultation Questions

Q. 3 Do you agree with ComReg's position that amendments are not presently required to the Numbering Conditions document in light of Article 93(6) or Article 106(6) of the EECC?

Virgin Media awaits the publication of the strategy around how ComReg will promote OTA provisioning and will provide comments at that time.

Q. 5 Do you agree with ComReg's proposed implementation of relevant provisions of Article 106 of the EECC relating to provider switching and number portability?

Virgin Media broadly agrees with proposal. However, we suggest that ComReg considers an alternative term to 'terminated number'. Surrendered might be a more appropriate term.

Q. 7 Do you agree with ComReg's proposal for PPDR Numbering?

Virgin Media has no issue with ComReg's proposal for PPDR numbering. We suggest that a full set of industry instructions are issued as soon as possible after a final decision is made.

Q. 8 Do you agree with ComReg's proposal to extend the operation of the utility emergency contact numbers in Figure 1 until 31 December 2023?

Virgin Media has no issue with ComReg's proposal to extend the operation of the utility emergency contact numbers identified in the consultation. However, we suggest that ComReg informs providers as soon as possible if any other numbers are to be added to the list and that a final definitive list is published in the final decision.

Q. 9 Do you agree with ComReg's proposal to conduct an evidence-based review in 2023 to determine if any further extended operation of any of the NGNs in Figure 1 is needed?

Virgin Media broadly agrees with ComReg's proposal. To ensure ongoing progress, we suggest that regular updates from the relevant utility operators are provided to ComReg from the end of 2021 (e.g. every quarter). It is important that these companies continue to progress making the necessary changes to meet the proposed end date of 31 December 2023.

If a decision is made in relation to any further extension, it should only be 3-6 months in length with monthly reviews thereafter.

Q. 10 On what basis do you consider international calls to Irish 1800 Freephone numbers should be facilitated (e.g. free to call or otherwise)?

Virgin Media has raised issues under the following Questions (11, 12 and 13) in relation to the implementation of international access to 1800 Freephone numbers. Notwithstanding this, Virgin Media suggests that given the possible variations in terms of processes and system set ups some flexibility will be required with regard to retail pricing. As there may be issues it will be important to

ensure that carriers are not out of pocket for providing the service. The numbering conditions should allow for the potential charging of retail customers.

We do not believe that there can be a requirement to have *'pre call announcements'* as suggested by ComReg. International calls to 1800 will be made from fixed lines and also from roaming mobile (and possibly non roaming) customers. The customers who dial these numbers may reside in other jurisdictions and Irish providers have no control in relation to how they are charged. This may also be the case where an Irish customer dials the number from a fixed line abroad. There could potentially be large variations in terms of customer experience and to ensure a level playing field we suggest that *'pre call announcements'* can not be a requirement.

**Q. 11 Do you consider that the cost of implementing international access to 1800 Freephone numbers would be reasonable for your organisation? Please explain the basis for your response in full and provide supporting information, clearly presenting any associated financial costs.**

Unfortunately Virgin Media has no method of quantifying the impact of implementing international access to 1800 numbers and therefore cannot determine whether the costs would be reasonable.

In the first instance we do not have information on the solution that will be implemented. If we assume it will be the one identified during a previous Industry meeting on the issue (i.e. the dropping of prefixes before the 1800 when dialled internationally), then the cost of implementing this technical solution should be reasonable. We would note that there may be alternative technical solutions and we refer to another under Question 13.

However, in the absence of information as to how the wholesale charging structure will operate in practice, it is impossible to determine the full cost of implementing this. We are concerned if nothing is agreed in relation to this that operators in Ireland may potentially face significant costs as we are unclear as to how this traffic will be identified and subsequently charged. Further if international traffic to 1800 increased significantly, this distortive impact would increase.

**Q. 12 Do you foresee demand for international access to Irish 1800 Freephone numbers?**

Virgin Media believes that demand for international access to Irish 1800 numbers could potentially increase after 2021 when the NGN consolidation exercise is complete. However, we would expect that many providers will switch to 0818 numbers. We make a suggestion under Question 13 around the possibility for ComReg to postpone its review of the internationalisation of 1800 until the data is clear around potential customer impact/harm.

**Q. 13 Are there any other issues relating to the potential introduction of international access to Irish 1800 Freephone numbers that ComReg should consider?**

Virgin Media understands ComReg's desired intention with regard to the potential introduction of international access to Irish 1800 Freephone numbers. However there are a number of things that must be considered.

Firstly, from a technical perspective there is a viable solution that could work as identified at an industry meeting (we also provide an alternative solution below). The call would need to come in from international providers as *'1800 xxx'* without any prefixes. A temporary prefix (00353) could be added

if there is a conflict with another similar number in an alternative jurisdiction. This temporary prefix would then need to be dropped before the call terminates. ComReg would need to ensure that directions in relation to this are distributed internationally. Secondly, in relation to retail charging we have provided comments under Question 10.

The third aspect that needs to be addressed regarding the internationalisation of 1800 is wholesale charging. We continue to have concerns in relation to how the wholesale charging regime will work in practice and how it will be possible to identify calls with an originating international dialling code and how these will be charged. If a resolution on this cannot be agreed, it could mean that Irish providers may not be able to recoup the full costs of providing the service.

An alternative option would be for ComReg to set up a dedicated international free phone number range from an unused range, e.g. 080xxxx. There would still be challenges with regard to charging and it will be important to ensure that providers can recoup the costs of providing the service, however it would be much simpler to implement at an operator level as such calls would be easy to identify.

Notwithstanding this, we are not clear if a customer impact/harm has been evidenced by ComReg. We would note that in general companies that use 1800 numbers also provide an alternative contact number for customers dialling from abroad. The issues around the international accessibility of 1800 appear to be well known and businesses have found simple solutions for customers.

As this is the case, Virgin Media suggests that the best option is for ComReg to monitor the number of service providers that switch number from 1890, 1850 and 076 to 1800 (rather than 0818) after the end of 2021. If there is a significant increase in the number of active 1800 numbers in comparison to pre-2019 levels, then this issue should be revisited at that time. We also suggest that ComReg could undertake a business survey to determine what proportion of businesses using 1800 also have an alternative number for customers dialling from abroad. As the potential changes required to allow for the internationalisation of the 1800 number are complicated and difficult to resolve (some issues would be addressed if a designated range was allocated for this purpose but not all), we suggest that a clear basis for the change is necessary.

**Q. 14 Do you agree with ComReg's proposed text for the Numbering Conditions to take account of operator obligations arising due to the ceasing of number ranges?**

Virgin Media has a couple of comments in relation to ComReg's proposed text for the Numbering Conditions to take account of operator obligations arising due to the ceasing of number ranges.

Under Section 3.1 (9) in the Numbering Conditions ComReg proposes the following text:

*Ceasing of Number Ranges – Undertakings shall inform their customers of any requirement to change number sufficiently in advance of the ceasing of the number range, and undertakings shall take appropriate measures in respect of such number changes to include the following:...*

While in principle we do not disagree with the proposal, ComReg must take account of practicalities associated with such a requirement. If ComReg makes a decision to cease an entire number range, there may be issues where a large number of customers use numbers within the number range. While such a situation might be rare in reality, we believe that, similar to how this is being dealt with through the NGN working group, providers should work with ComReg in relation to the provision of information to customers of a requirement to change numbers and that the proposed text should state that the practicalities and costs associated with this requirement should be considered by ComReg in imposing such a requirement. Our suggested change to the text is in red below:

*Ceasing of Number Ranges – Subject to practicalities and engagement with ComReg, Undertakings shall inform their customers of any requirement to change number sufficiently in advance of the ceasing of the number range, and undertakings shall take appropriate measures in respect of such number changes to include the following:...*

The proposed text further states that '*... in-call announcements shall be put in place to inform callers that: (1) the original number has been replaced and is no longer in use, and (2) make adequate provision to direct the caller to the new number; ...*'

Virgin Media has no issues with the proposal for in-call announcements to be put in place where a number range is ceasing. However, we do not agree with the level detail that proposed to be given to callers in the in-call announcement. The details are very specific and will not be workable in practice where an entire number range is being ceased. This issue has been raised and discussed on several occasions during NGN Working Group meetings in the context of the forthcoming NGN changes. There is no scenario where this would be workable for any other number range. The announcement must be generic. Businesses that use the numbers should have responsibility for keeping their customers informed of any alternative contact details. It is disproportionate to expect undertakings to take on this responsibility. We suggest that the content of the in-call announcements should align with the proposals under Question 15 which will work in practice and will be workable in any other situation where a number range is ceasing. Our suggested change is as follows:

*'... in-call announcements shall be put in place to inform callers that: (1) the original number has been replaced and is no longer in use, ~~and (2) make adequate provision to direct the caller to the new number~~*

Q. 15 Do you have any views on the format of recorded announcements?

Virgin Media has no issue with the proposed format of the recorded announcements.

Q. 16 Do you agree with ComReg's proposal to introduce the need for a written end-user order as a RoU condition of use for 1800 and 0818 NGNs and do you agree with ComReg's proposed text to reflect this in the Numbering Conditions?

Virgin Media would request some guidance as to how this would work in the case of resellers where an undertaking has no relationship with the end user. An undertaking would not have any information on the end customer so would not possess any written end-user order. This proposed requirement does not appear to be practically possible. We do not see the rationale for the inclusion of a requirement to get a written end-user order and we suggest that should this requirement remain that it is limited to numbers where the relevant undertaking has a direct relationship with an end-user.

Q. 17 Do you agree with ComReg's proposals to (a) insert a paragraph in Section 3.1 of the Numbering Conditions confirming ComReg's acceptance that authorised undertakings may provide services to resellers in the market as described and (b) insert the definition of reseller in Appendix 11 of the Numbering Conditions?

Virgin Media does not understand how this is practically possible and suggest that some flexibility is necessary here. Resellers are an important feature of the market and it is our view that as they have the direct relationship with the end-user it is not possible for an undertaking to make sure that they are compliant with every condition. Resellers must take some responsibility. The explicit requirement for an undertaking to take full responsibility for all activities of a reseller in the context of the Number Conditions might reduce the incentive for undertakings to provide such services.

Q. 22 Do you agree with ComReg's assessment of temporary numbers? Please give reasons for your answer highlighting any solutions that you think might support the introduction of temporary numbers

Virgin Media has no issues with ComReg's assessment of temporary numbers.

Q. 23 Do you agree with the proposal that ComReg will continue to monitor developments in Cloud services at ECC/CEPT, to promote greater policy harmonisation for Cloud services across Europe?

Virgin Media agrees with ComReg's proposal to continue to monitor developments in Cloud services at ECC/CEPT.

Q. 24 Do you agree with ComReg's proposal to reserve 1,000 numbers in the number range 089 011 0000 to 089 011 0999 for drama use?

Virgin Media has no issues with ComReg's proposal.

Q. 25 Do you agree with ComReg's proposal to add the said text to paragraph 6 of Section 3.2 "Rights of Use Conditions", clarifying that trading of numbers is not permitted?

Virgin Media agrees with ComReg's proposal to add the text to Section 3.2 clarifying that trading of numbers is not permitted.





## 12:Vodafone Ireland Limited

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## Vodafone Response to Consultation

Review of the Numbering Conditions of Use and Application Process

Reference: ComReg Doc 21/28

Version: Non-confidential

Date: 11/5/21

## Introduction

Vodafone welcome the opportunity to responds to this consultation on the Review of the Numbering Conditions of Use and Application Process ComReg 21/28.

We further welcome the statement from ComReg that they aim to review and update these Number Conditions of Use at least every two years. We would suggest that given the ongoing changes happening in the provision of communications services it is important to update the guidelines at least every two years and that furthermore occasional more frequent updates will be required.

A number of key issues are highlighted in this document.

1. NGN Numbering: Vodafone have taken a full part in the forums that ComReg have organised discussing the details of changes to NGN Numbers. It has been a useful process to establish clear details of working process for this number set. We welcome the documentation of the decisions made in this forum into the Conditions of Use.

However challenges remain in implementing some of the changes needed to NGN numbers in the timescales set by ComReg. Customers of these numbers have difficulty in completing the required implementation while their organisations are also coping with Covid restrictions.

2. Cloud Numbers: Vodafone welcome the discussion in this document on Cloud number applications. As our economy has become more digital, the services – and also the rules - that support this transformation must also evolve. ‘Cloud Numbering’ will be integral to supporting a modern, digitised economy.

In the future Cloud Numbering will encompass different types of number ranges, including geographic, nomadic, mobile and toll-free. The potential of this market, which includes both voice and text enabled services, is broad, constantly evolving and integral to future European economic growth. In particular Mobile Numbers are well place to provide a best solution for Cloud Services allowing to address all Cloud Services use cases - Privacy Enhancement; Conference Platform; Click to Call and Call centres- using both voice and text communication services. The need for such innovation has become even more pronounced as economies seek to digitise to ensure resilience in response to Covid-19. The digital solutions that numbering resources from these types of ranges support are increasingly being used at scale and demand for related commercial propositions is growing 35%+ p.a. The potential of this market, which includes both voice and text enabled services, is broad, constantly evolving and integral to future European economic growth.

Vodafone agree with the statement “ComReg is of the view that policy harmonisation across Europe for Cloud services is in the interests of consumers and providers alike. To this end,

ComReg will continue to advocate for greater European policy harmonisation for Cloud services” and would welcome their on-going collaboration with CEPT.

Vodafone will similarly continue to engage at a national and EU level with a view to creating as harmonized approach as possible to the modernization of numbering rules across Europe.

## Response to Consultation Questions

### Assignment of numbers to non-ECS/ECN entities

Context: ComReg notes the option provided in the EECC for it to assign numbers to non- ECS/ECN. While the EECC highlights the potential use of such assignments in the IoT/M2M sector, as noted above, no use cases were identified in responses to the BEREC public consultation on its Guidelines. In addition, ComReg has not received queries from any IoT end-users in relation to potential assignments of numbers, and ComReg is not aware (via its participation in CEPT Working Groups) that any other NRA has been approached on this issue. Therefore, ComReg’s preliminary position is that is not minded to make amendments to the Numbering Conditions in respect of this option at this time. Instead it will consult further with industry on appropriate conditions of use attaching to numbers assigned to non-ECS should a use case be presented to it in the future. Furthermore, in noting the EECC’s identification of the IoT/M2M sector as the source of potential use cases, ComReg proposes to only consider the assignment of 088 M2M numbers to non-ECS/ECN in the future.

Question 1: Do you agree with ComReg’s preliminary position on the assignment of numbers to non-ECS/ECN as permitted by Article 93(2) and Article 94(7) of the EECC?

Vodafone Response: Vodafone agree with ComReg’s view that it is not necessary to make amendments to the Numbering Conditions in respect of this option at this time. However, ComReg should continue to consult with industry on appropriate conditions of use attaching to numbers assigned to non-ECS as it is highly probable that such use cases will be presented to ComReg in the future.

As part of its formal consultation process ComReg covered this issue extensively in consultation document 18/03 “Review of Mobile Numbering Promoting Innovation and Facilitating New Services” The positions adopted by ComReg at time remain valid.

### Extra-territorial use of numbers

Context: Recital 246 of the EECC provides as follows: “ In light of the considerable risk of fraud with respect to interpersonal communications, such extraterritorial use should be allowed only for

the provision of electronic communications services other than interpersonal communications services. “

With regard to Article 93(4), ComReg has already made available the 088 range non-geographic number range for M2M. Furthermore, the conditions of use attaching to these M2M numbers, such as permission for their use extraterritorially, are reflected in ComReg’s current Numbering Conditions. Consequently, as ComReg has already implemented Article 93(4), ComReg’s preliminary view is that no further amendments to the Numbering Conditions in this respect are necessary.

Question 2: Do you agree with ComReg’s position that Article 93(4) of the EECC does not require further amendments to the Numbering Conditions document?

Vodafone Response: It does appear that the transposition of Article 93(4) will not require further amendments as the current M2M rules. The issues addressed in this Article were already examined in ComReg’s consultation on the introduction of the 088 range and we agree, at this time, that no further amendments to the Numbering Conditions in this respect are necessary.

## Promotion of Over-The-Air Provisioning

Context: ComReg has procured expert advisors WIK-Consult GmbH to develop a strategy for OTA provisioning in Ireland. ComReg intends to publish the above (in report format with confidential information suitably redacted), together with a public preliminary consultation in Q3 2021. ComReg may also commission further expert advice on specific issues, relating to the Service Provider’s findings.

ComReg does not presently consider that amendments to the Numbering Conditions document need to be made to take account of OTA as set out in the EECC, as transposed.

Question 3: Do you agree with ComReg’s position that amendments are not presently required to the Numbering Conditions document in light of Article 93(6) or Article 106(6) of the EECC?

Vodafone Response: Vodafone welcome ComReg’s proposal to undertake a project to develop its approach in fulfilling its role to promote OTA provisioning. We look forward to cooperating with the study proposed and agree that Amendments are not required to the Number Conditions document in light of Article 93(6) or Article 106(6) of the EECC.

## Missing children and child helpline hotlines

Context: ComReg does not consider that amendments to the Numbering Conditions document need to be made to take account of Article 96 of the Code at this time. ComReg would underline that it is important that Article 96(3) of the EECC is fully transposed. This Article provides as follows: “Member States shall take appropriate measures to ensure that the authority or undertaking to which the number “116000” has been assigned allocates the necessary resources to operate the hotline”.

Question 4: Do you agree with ComReg’s position that no amendment to the Numbering Conditions in respect of Article 96 of the EECC is required?

Vodafone Response: Vodafone agree with ComReg’s position that no amendment to the Numbering Conditions in respect of Article 96 of the EECC is required.

## Provider switching and number portability

Context: ComReg proposes to add a clarification to the Numbering Conditions document that the Industry porting process includes porting numbers out of quarantine, as follows:

Section 3.2 “Rights of Use Conditions” paragraph 7: “When a number is surrendered by an end-user or is otherwise recovered by the holder which assigned the number or by the undertaking to which the number was ported, the number shall thereupon be placed in quarantine for a period of 13 months and shall not be assigned to anyone other than the previous end-user during the 13-month period of quarantine. In addition, the end-user retains the right to port the terminated number to another provider at any time during the quarantine period unless that right is renounced by the end-user.

There shall be no conditions placed on an end-user to re-contract or make contact with the provider where the number is quarantined in order for that number to be ported. The quarantine period may be waived if the previous end-user and the new end-user both consent to this in writing, and the holder for the number shall make such end-users aware of the consequences of waiving the quarantine period”.

Question 5: Do you agree with ComReg’s proposed implementation of relevant provisions of Article 106 of the EECC relating to provider switching and number portability?

Vodafone Response: We have no issue with the intent of the proposal from ComReg. We are working with the other industry player to ensure that all of implementation of porting are operating in line with the EECC.

We agree that a user should not have to re-contract with his previous provider in order to port, however the text also suggests the losing operator may not contact the customer. It should be caveated that it is acceptable for the losing operator to reactivate the customer on their network in order to facilitate the port. In some case verification of end-user can be difficult, e.g. in a dissolved partnership. Including the phrase ‘make contact’ may prove an obstacle to resolving a small number of issues that arise.

We would also note that it should be sufficient for the previous end-user to consent in writing.

## Consequential EECC Amendments, such as Amendments to Annex 11 “Definitions” of the Numbering Conditions Document

Question 6: Do you agree with ComReg’s proposed reflection in the Numbering Conditions Document of consequential amendments to Appendix 11 “Definitions” arising from the EECC?

Vodafone Response: Vodafone agree with the proposal.



## Numbering for PPDR Services

Context: It would clearly be simpler for industry to cease operation of 076 numbers for PPDR services coincident with ceasing operation of 076 numbers more generally, on 31 December 2021. However, OGCIO has highlighted to the NGN WG that it is currently dealing with a number of other higher priority projects e.g. related to supporting communications in new vaccination centres and the complete switchover to 089 for PPDR services may need to be pushed out beyond 31 December 2021. ComReg is interested in the OGCIO's and operators' views on this.

Save for any exceptional circumstances as ComReg shall determine, all rights of use for Non-Geographic Numbers in the ranges 1850, 1890, and 076 shall be withdrawn from all undertakings to whom such rights of use were granted at midnight on 1 December 2021

Question 7: Do you agree with ComReg's proposal for PPDR Numbering?

Vodafone Response: Vodafone appreciate that extensive discussion has taken place at the NGN forum on the new number for PPDR. We agree in principle with the number range chosen and the other technical condition planned in ComReg's consultation document.

It is important to flag that the Vodafone technology team have very serious concerns on the timescales proposed for the implementation of opening of the new range. Their estimate of a reasonable time to complete the design and implementation of review of the requirements to complete the change called for would be six months from a final decision. We of course appreciate the importance of not causing any interruption to these services. Planning for the ceasing of the 076 at end of calendar year when most networks are in a 'lockdown' would be unwise and we recommend that the end of parallel working is extended by three months, to the end March 2022. This would allow for appropriate testing for the changes to network before access to 076 is shut-off.

## Utility Emergency Contact Numbers

Context: Any decision to potentially further extend the lifetime of one or more of the 1850/1890 numbers in service at that point will be made by ComReg in accordance with, inter alia, its statutory function of managing the national numbering resource, and its statutory objectives of ensuring the efficient management and use of numbers from the national numbering scheme.

ComReg plans to discuss and agree the review framework with the CRU, utilities, and industry in the coming months, and intends to complete its evidence-based review in advance of the 31 December 2023.

The following numbers shall remain in operation until 31 December 2023:

Utility	Emergency contact number
ESB Networks (ESBN)	1850 372 999

Gas Networks Ireland (GNI)	1850 2050 50
	1850 4277 47
	1850 211 615
Irish Water (IW)	1850 278278
	1890 278278

Question 8: Do you agree with ComReg's proposal to extend the operation of the utility emergency contact numbers in Figure 1 until 31 December 2023?

Question 9: Do you agree with ComReg's proposal to conduct an evidence-based review in 2023 to determine if any further extended operation of any of the NGNs in Figure 1 is needed?

Vodafone Response: In relation to question 8 and 9 we note that the preservation of this small quantity of NGN numbers will add complexity and hence considerable cost to change operation that to implement the termination of 1850 and 1890 ranges.

Maintaining these numbers going forward will also have a cost as they will need to be tested separately during future network changes. We understand and accept the rationale for their temporary extension but ask ComReg to work with all parties to have them removed in as short a time as possible.

On utility numbers We agree that the retention of these numbers has been extensively discussed at the NGN forum. As agreed at that forum we understand that the list of utility emergency number in paragraph 149 will remain in use until 31 Dec 2023. We agree that a review should be completed in 2023 to determine if a further extension is granted.

## International Access to 1800 Freephone Numbers

Context: To further its consideration of the issue, ComReg is now keen to explore the potential economic impact to telecoms operators of introducing international access to 1800 numbers in Ireland.

Question 10: On what basis do you consider international calls to Irish 1800 Freephone numbers should be facilitated (e.g. free to call or otherwise)?

Question 11: Do you consider that the cost of implementing international access to 1800 Freephone numbers would be reasonable for your organisation?

Question 12 Do you foresee demand for international access to Irish 1800 Freephone numbers?

Question 13 Are there any other issues relating to the potential introduction of international access to Irish 1800 Freephone numbers that ComReg should consider?

Vodafone Response: Implementing international access to Irish 1800 Freephone numbers present a number of difficulties for operators

- This range of numbers may not be open in the network of operators in other countries and getting International operators to implement the change can be a long slow and uncertain process.
- It is unsatisfactory to have a situation where access to a number may or may not work depending, for instance, on the mobile operator a customer is connected to in a foreign country.
- This uncertainty could lead to considerable customer care issues: providing support to customers having these difficulties would be a major burden
- There is a likelihood that, if implemented, some service providers may rely on this number being available rather than giving an alternative Geo number to their customers.
- It is unclear how this would fit in with Roam- like- at- home regulations.
- We have previously communicated to customers that calls to 1800 will not be recorded on bills.
- Recent changes to NGN numbers have sought to bring clarity and simplicity – It would be counter to this to introduce such an uncertain service.

Without a detailed plan it is difficult to estimate costs however the preliminary view of our Wholesale and Interconnect team is that a budget of €250,000 would be required for a project to implement this. And so would not be “economically feasible” for the small number of calls.

## Number Changes – Obligations on Operators

Context: Two points are noteworthy both for the current NGN implementation project and in general. Firstly, what constitutes informing customers ‘sufficiently in advance’? ComReg considers that this will vary from case to case and should be made clear to industry as part of any Decision to cease number ranges. In the case of the NGN implementation project, ComReg accepts that for 1800 NGNs, the ComReg Decision on wholesale pricing was not finalised until January 2020,

Question 14: Do you agree with ComReg’s proposed text for the Numbering Conditions to take account of operator obligations arising due to the ceasing of number ranges?

Vodafone Response: We agree in principle that customers should get notice of proposed number changes. In relation to the current change in NGN numbers it is important to note that it was not possible to develop new commercial models for NGN numbers before the completion of the ComReg decision on wholesale pricing.

While we were able to inform customers that numbers were changing we were not in a position to make substantial commercial offers on alternative. This has added considerable delay in customers moving from the old NGN number set and illustrated the difficulty that separating the decision on NGN wholesale and retail created for operators and service providers.

We have no issue with the text of the proposed announcements.

We note that in b2 above ComReg have retained the text “(2) make adequate provision to direct the caller to the new number;” .As discussed at the NGN forum there is no practical way of implementing this and we suggest this clause (2) is dropped.

## End-User Validation – Condition of Use

Context: The application process in the current Numbering Conditions requires applicants for individual 1800 and 0818 NGNs to enter a unique end-user identifier on the FNP assignment system to allow an assignment to be validated. This identifier may be the end-user name, or suitable alternative such as account number or order number. This is an important requirement to prevent hoarding of numbers, including ‘golden’ numbers, by operators or their resellers. The numbering team now wishes to strengthen this requirement by setting it out as a new condition of use.

To introduce the need for a valid end-user when assigning NGNs on the FNP system, it is proposed to add the following text to the Numbering Conditions:

Add the following as paragraph 4 of Section 4.4 “Standard Rate Numbers”, RoU Conditions;

*An authorised undertaking shall only be granted the Rights of Use of 0818 Standard Rate Numbers if it is in receipt of a written order from an end-user for the number(s) being applied for together with the end-user’s unique identifier. This identifier shall be the end-user’s name, or suitable alternative such as account number or order number which enables ComReg to validate the authenticity of the assignment order*

Question 16: Do you agree with ComReg’s proposal to introduce the need for a written end-user order as a RoU condition of use for 1800 and 0818 NGNs and do you agree with ComReg’s proposed text to reflect this in the Numbering Conditions?

Vodafone Response: We agree with principle that numbers used should be linked to a specific customer Order. We suggest that in the text the words ‘written order’ is replace with ‘verified order’

In other documentation related to use of NGN numbers we have referred to the business using the NGN number as the Service Provider rather than end-user. For consistency it would be good to use that term here.

In the case of Cloud number applications, the Operators will be dealing with a Cloud Number Service Provider. It will be appropriate in these cases for the Verified order will come from this Cloud Number Service Provider rather than the “ end user”.

## Reseller Services

Context: For the avoidance of doubt, ComReg recognises the presence of resellers in the market. In the provision of number-based services, the number holder is responsible for the rights of use conditions that attach to those numbers as set out in Section 2 (a) of the Numbering Conditions.

ComReg proposes to add the following definition to Appendix 11 of the Numbering Conditions:

*“Reseller” means an authorised undertaking that enters into a contract with another authorised undertaking to receive number dependent services that the reseller uses to provide its own number dependent service to its end-users or to other authorised undertakings.*

Question 17: Do you agree with ComReg’s proposals to (a) insert a paragraph in Section 3.1 of the Numbering Conditions confirming ComReg’s acceptance that authorised undertakings may provide services to resellers in the market as described and (b) insert the definition of reseller in Appendix 11 of the Numbering Conditions?

Vodafone Response: Vodafone recognise that there is currently an issue with reporting on the implementation of the NGN change project. However, this current issue is essentially a temporary problem generating monthly report up to Dec 2021 and we suggest is not best dealt with by these proposed changes.

Current arrangements between Operators and resellers developed over a number of years and will take some time to re-contract. Any change in the Number Conditions of Use will then need to be integrated into agreements between operators and resellers - the timescale for implementing this would likely mean the change would not be completed in time to make a useful contribution to the reporting of current project.

We suggest that this change is deferred to broader consideration of a solution for cloud number applications.

We suggest therefore that the proposal covered by Q17 are deferred until more thought is given to the implementation of cloud number solutions.

## Numbering Resources for Cloud Communications Service Providers

Context: ComReg is of the preliminary view that the Numbering Conditions continue to support new and innovative services enabled by Cloud Numbers. In order to provide sufficient clarity about how Cloud Services can be delivered using the numbering resource, ComReg notes the following:

- The Numbering Conditions permit the use of NGN ranges (i.e. 1800 and 0818) for the provision of Cloud Services.
- ComReg recently addressed confusion and cost issues (wholesale and retail) previously associated with the NGN platform and NGNs now provide a fit-for-purpose solution for businesses and consumers, as evidenced by recent increases in use of the NGN platform in support of same.
- ComReg is not minded changing the numbering condition attached to the use of geographic numbers, that requires an end-user to have a residential/business premises located within the designated minimum numbering area (MNA) for that Geographic Number.
- For businesses or consumers with a requirement for Geographic Numbers, Cloud SPs must ensure that the end-user’s residential/business premises are physically located within the designated MNA for that Geographic Number.

Question 18: Do you agree with ComReg's proposal to retain the Geographic Number condition requiring the end-user's premises to be physically located within the designated MNA for that number? Please explain the basis for your response in full and provide supporting information.

Question 19: Do you agree that Non-Geographic Numbers (0818 Standard Rate and 1800FreePhone) provide a valid solution for Cloud Services? Please explain the basis for your response in full and provide supporting information

Vodafone Response: Number Sets for Cloud Number Applications. It is Vodafone's view that it would be in customers interest to implement Cloud number solutions in Geographic number sets, Mobile numbers and in Non-Geo numbers. As we move towards converged services it would be useful to note that any of the cloud number applications: including click-to-call, conferencing, privacy enhancement, and conferencing scenarios should be able to work with any of the number sets.

Mobile Numbers: As per footnote 47 of ComReg document we agree that for Mobile Numbers an OTT service provider should only be granted right of use through a contract with an Irish MNO. We understand that no change is required for this as Section 6.2 of ComReg's Numbering Conditions already states that rights of use for Mobile Numbers can be granted to OTT Service Providers, provided the OTT Service Provider qualifies as an ECS, and the OTT Service Provider has a contract with an Irish MNO to access its network.

We note there is a contradiction between paragraph 211

*"For the purpose of this assessment, ComReg notes that only Non-Geographic Numbers under (a) – (c) can be used in respect of Cloud Numbers."*

and footnote 47

*"47 As set out in Section 6.2 of ComReg's Numbering Conditions (document 15/136R2 as amended), the rights of use for Mobile Numbers and MNCs shall only be granted to MNOs and MVNOs, and to OTT Service Providers, provided the OTT Service Provider qualifies as an ECS, and the OTT Service Provider has a contract with an Irish MNO to access its network. Mobile numbers are assigned in blocks of 100k numbers. Cloud SPs that wish to use mobile numbers for their services should contact a holder of such mobile numbers."*

## Geographic Numbers

We question the outcome of the consultation on geographic numbers. The key argument, based on a survey, seems to be that consumer confidence in Geographic numbers would be entirely eroded, if a geo-number could be assigned to an end-user who did not have a registered address in the relevant locality.

- Cloud numbers are a new technology. It is difficult for a consumer to respond to a survey without having more complete information on the new services being proposed.
- One of the key concerns from consumers appears to be cost. However, there is no reason why, if a user without a registered address could obtain a geo-number, that the cost for calling

that number would increase beyond the existing rate. Indeed, we would encourage keeping this as a condition of use of geographic number.

- We also question whether the concern of 'fraud' may be overstated, (in case geo-numbers can already be used quite flexibly).

The original Geographic Number Plan was developed as a mirror of the fixed Telephone network with local and transit exchanges, and a cost structure where Transmission over longer distanced dominated the cost model.

This no longer the case. All networks are consolidating switching network to much smaller number of exchanges covering larger areas. Calls to different parts of the country no longer have a cost structure based on distance.

In this environment Vodafone believe that it is no longer useful to maintaining a requirement that the customer has a registered address in a specific Geographic area in Ireland (or in an MNA).

We are not strictly opposed to maintaining a requirement that the customer has a registered address in Ireland, if more flexibility is given on the allocation of geo numbers from other areas in Ireland. Having the requirement to have a business address in Ireland should adequately address the fraud concerns raised by ComReg. We note that there are a number of countries who have already removed the geographic significance of geo-numbers.

Examples:

UK: No restriction - numbers can be used outside of the geographic location and can even be allocate to end-points outside of the UK, provided

- There is no Ofcom objection on basis that this is not an effective / efficient use of numbering;
- The calling party only pays for a local call.

France: Similar to UK. Geographic numbers should be located in the same geographic area as designated by their prefix. However, can be used outside of that area, if:

- Subscriber has requested it.
- Calls charges to that number are consistent with a standard charge to that call.

Norway: Regulator recently removed geographic relevance of numbers. The geo-numbers still exist, but are referred to as 'fixed' numbers, without needing to be geographically linked to location.

Romania: It is possible to use a geographic number in locations outside of the geographic region it was assigned to.

Canada: Fixed numbers do have a pre-fix which indicates a geographic area. However, it is possible for these numbers to be allocated to services that originate / terminate outside of that area (including e.g. nomadic VoIP services). In such cases, they are treated as "Fixed – Non-Native" numbers. Where they can be used to originate calls, additional emergency calling requirements apply to support transmission of geo-location information. However not applicable to Cloud Numbering use cases.

Many (smaller) countries in APAC (HK, Singapore for example) have removed the concept of geographic numbers entirely.

During Covid lockdown customers have adapted quickly to change - moving to click- and- collect, and to online purchasing as restrictions demanded. We are confident that a reasonable rule set could ensure that cloud numbers operate in a way that maintains consumer confidence in numbering.

## Review of MNAs

Context: However, ComReg also indicated that it had no objection in principle to geographic boundaries for Geographic Numbers being increased it is timely to re-visit the MNA concept as part of the current consultation.

Question 20: Do you have a view as to the need to retain the MNA concept?

Vodafone Response: See our comments above on Geographic areas in answer to cloud numbering questions.

We believe that the technical justification for MNAs has now disappeared as networks move to larger, more centralised exchanges.

The MNA concept does not do anything useful for customers and now only serves to add cost and complexity to the number allocation and porting processes.

As ComReg note, removing conditions related to MNAs would not require an change to current numbers and would encourage innovation and simplify future technology development.

## Review of other Cloud Numbering Topics

Question 21 Do you agree with ComReg's assessment of the conditions around CLI and Number Portability in relation to the use of numbers for Cloud Services?

Vodafone Response: We agree with ComReg's assessment of the conditions around CLI for cloud number applications As referred to in paragraph 260 - Numbers used for numbers used for CLI must also fall within a permissible class of number.

The porting of numbers used in cloud applications not so clear. It would seem that numbers used in privacy enhancing single transactions or click-to-call scenarios have no specific value to the Service Provider or individual user and there should not be a need to port these numbers.

The situation with these numbers is similar to that of IoT. The Service being offered is more than just connectivity, service providers will be offering a number of value added services (e.g. advanced analytics capabilities) to the end-user, which often derive value from the additional functionality of that service provider's IT platform. Connectivity is thus only one of many elements that that require



consideration in the context of interoperability and switching. Porting solution should probably be considered as part of future European standardisation.

## Temporary Numbers

Question 22 Do you agree with ComReg's assessment of temporary numbers?

Vodafone Response: Vodafone are not currently seeking the introduction of Temporary Numbers

## EU & CEPT Status

Context: ComReg is of the view that policy harmonisation across Europe for Cloud services is in the interests of consumers and providers alike. To this end, ComReg will continue to advocate for greater European policy harmonisation for Cloud services.

Question 23 Do you agree with the proposal that ComReg will continue to monitor developments in Cloud services at ECC/CEPT, to promote greater policy harmonisation for Cloud services across Europe?

Vodafone Response: We strongly agree with the statement "*ComReg is of the view that policy harmonisation across Europe for Cloud services is in the interests of consumers and providers alike. To this end, ComReg will continue to advocate for greater European policy harmonisation for Cloud services*" and would welcome their on-going collaboration with CEPT.

Vodafone will similarly continue to engage at a national and EU level with a view to creating as harmonized approach as possible to the modernization of numbering rules across Europe.

## Numbers for drama use

Question 24: Do you agree with ComReg's proposal to reserve 1,000 numbers in the number range 089 011 0000 to 089 011 0999 for drama use?

Vodafone Response: We have no objection to this proposal.

## Number Trading

Context: In paragraph 6 of Section 3.2 of the Numbering Conditions, ComReg sets out its Right of Use condition that no charge of any kind shall be made for transferring a right of use for a number, other than a charge limited to covering the associated administrative costs. For clarity ComReg wishes to also highlight that it does not permit trading in numbers. Therefore, the following underlined amendment will be added to this Right of Use condition as follows:

No charge of any kind shall be made for transferring a right of use for a number, other than a charge limited to covering the associated administrative costs. For clarity, trading of numbers is not permitted.

Question 25: Do you agree with ComReg's proposal to add the said text to paragraph 6 of Section 3.2 "Rights of Use Conditions", clarifying that trading of numbers is not permitted?

Vodafone Response: We agree with the ComReg's position that there should be no charge for transferring Number right of Use from one Operator to another. For clarity ComReg should ensure that the text chosen does not create a barrier to Cloud Number services.

ENDS