



Commission for
Communications Regulation

Consultation Paper

Review of the Premium Rate Services Numbering Scheme

Document No:	03/27
Date:	28 February 2003

All responses to this consultation should be clearly marked:-
“Reference: Submission re ComReg 03/27” as indicated above,
and sent by post, facsimile or e-mail, to arrive on or before 5pm,
Friday 28th March 2003, to:

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1 Introduction

The current Premium Rate Services (PRS) numbering scheme has been in place for over 10 years. This scheme uses numbers beginning with the access code 15YZ followed by 6 digits, where increasing values of Y generally correspond to increasing per-minute¹ call charges. The per-minute rates are industry-agreed single price points that ComReg understands have not changed since the inception of the scheme. Whilst this scheme has served the industry to date, current market conditions and new service innovations have led to a number of industry proposals to ComReg, and the Numbering Advisory Panel (NAP)², requesting changes to the current scheme.

In considering these proposals, ComReg decided that an overall review of the current scheme was more appropriate than potential piecemeal development of the scheme. This consultation paper therefore puts forward ComReg's proposals for possible revisions to the scheme which, while catering for individual proposals, also attempt to take into consideration: -

- User friendliness and tariff transparency
- Minimum disruption to users and service providers
- The facilitation of competition
- Flexibility for future changes and innovations

We would welcome your response to this consultation paper. ComReg particularly welcomes feedback from consumers and their representatives. The closing date for receipt of comments is Friday 28th March 2003. Guidelines for submitting comments are contained in Section 8.

¹ The exception is 1540, which is charged at a flat rate, independent of the duration of the call

² The Numbering Advisory Panel (NAP) meets approximately 4 times a year to discuss numbering issues affecting the Irish Telecoms industry. Membership of the group is drawn from industry and consumer/business representative organisations.

2 Background

PRS in Ireland are accessible through a unique range of prefixes; 1520, 1530, 1540, 1550, 1559, 1560, 1570 and 1580. PRS are typically live or recorded information services (e.g. recorded weather information, traffic news, stock exchange reports, lottery results and sport results, or live advice lines and entertainment services). In more recent times, with the proliferation of mobile phones, premium rate numbers have been used for services such as purchasing mobile ring-tones and graphics. The most widely used prefixes are 1550 (typically for recorded information) and 1580 (typically for live services). The 1559 prefix is dedicated solely to adult services and is only accessible with a PIN number, issued by a Network Operator.

PRS are promoted in print media and on television, radio and the Internet. While the Premium Rate numbering scheme is managed by ComReg, the content and promotion of premium rate service is regulated by RegTel³.

Calls to PRS cost more than ordinary telephone calls and each prefix carries a specific call cost. The current number ranges and corresponding price points available for PRS are as follows:

Access Code	Cents/minute incl VAT	Cents/call incl VAT	Cents/minute, incl VAT - Adult Services
1530	33		
1540		58	
1550	74		
1559			74
1560	95		
1570	1.27		
1580	1.90		

Table 1: PRS ranges and corresponding prices⁴

Calls from mobile phones generally cost more and the surcharge for mobile-originated calls varies according to the Mobile Network Operator. Premium Rate call charges are billed to consumers' telephone accounts and are usually listed separately on customers' bills. Revenues from Premium Rate calls are shared between the network operator(s) involved in carrying the call, the Premium Rate service provider and potentially others who contribute to the provision of the service (e.g. content providers).

There are currently approximately 250 Service Providers offering PRS in Ireland and 5 network operators hosting Service Providers. As mentioned, the current Premium Rate scheme has been in place for over 10 years, and requests have been made for ComReg to update this scheme. The next subsection outlines some of the proposals that have been made to ComReg in this regard.

2.1 Recent Numbering Advisory Panel Discussions

A proposal has been made to ComReg via the Numbering Advisory Panel to introduce more 'drop charge'⁵ number ranges into the PRS scheme.

³ <http://www.regtel.ie>

⁴ The range 1520, while included in the National Numbering Plan, is not currently in use.

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In the current PRS scheme, 'drop-charge' calls are provided for through the 1540 access code, which caters for a charge of €0.58 per call. The proposal requests that more 'drop-charge' ranges be opened in order to provide for higher priced 'drop-charge' services. This issue, which has been discussed at length at NAP meetings, is presented in more detail in the next section of this consultation paper.

A second proposal made to ComReg is to increase the price of the highest price point (currently €1.90 per minute on the 1580 code), or possibly to introduce a new price point based on a new code, e.g. 1590. The proposing party has indicated that they consider that highest PRS price should to be increased due to increased operational costs (e.g. advertising), inflation, etc. The existing price points for PRS were set some time ago by *eircom* (then Telecom Eireann) and were chosen because of the limitations imposed by billing systems at the time, amongst other reasons. These price points were adopted by the industry and ComReg (then the ODTR) after liberalisation.

Rather than make piecemeal additions to the current scheme to accommodate these proposals, it was felt that this opportunity should be taken to review the entire PRS scheme, offering all interested parties the opportunity to express their views and having regard to the objectives of such a review, as outlined in the Introduction.

⁵ In general, the charge for a call to most services is dependent on the duration of the call. 'Drop-charge' calls, however, refer to a single fixed charge per call, regardless of the duration of the call (but normally subject to a predefined maximum duration for practical reasons).

3 Pricing

This consultation presents an opportunity to review the pricing aspect of the PRS scheme in the context of any new numbering scheme. There are three alternative approaches to price indication when developing a new numbering scheme for PRS:

- No price indication
- Price Point indication – one price per access code
- Price Band indication – range of prices per access code

In this section, ComReg considers each approach in detail, highlighting two Price Band based proposals for further consideration.

3.1 No Price Indication

Such a scheme could be based on a numbering arrangement such as: -

1500 XXX XXX or 0900 XXX XXX

where the Premium Rate number dialled gives no indication of the retail price being charged. Whilst opinions vary as to the degree that consumers in general recognise that different access codes signify different prices, ComReg believes that regular users of PRS are accustomed to price indication provided by the number and rely on this to manage call usage. ComReg considers that such a scheme would not provide a reasonable level of transparency for users.

Q. 1. Do you agree that a scheme, where the Premium Rate number dialled gives no indication of the retail price being charged is undesirable, and should not be introduced?

3.2 Price Point Indication

The existing numbering scheme for PRS provides price indication based on the third digit of the access code in ascending order, e.g.,

Price Point 1550 € 0.74 per minute incl. VAT

Price Point 1560 € 0.95 per minute incl. VAT

Price point 1570 €1.27 per minute incl. VAT

This scheme has been in place for some time and ComReg believes that consumers in general recognise 15XX as Premium Rate and regular PRS users recognise the significance of the ascending order of codes, at least to some extent. Maintaining this type of structure therefore seems to have some merit. However, while the current approach provides an indication of price and is technically easy to implement, it does not facilitate:

- price reductions arising from reductions in input costs
- price reductions arising from competition
- price increases arising from inflation
- changes in currency values, e.g. as occurred on introduction of the Euro

- changes in the rate of VAT

In general, such an approach may tend to facilitate price fixing arrangements, which may not be consistent or compliant with statutory competition rules.

The impact of the above adverse factors could be reduced by significantly increasing the number of Price Points and codes but this in turn would increase the complexity and reduce the user-friendliness of the scheme.

Q. 2. Are you in favour of the retention of a numbering scheme for Premium Rate Services that is based on Price Points? If so, how should it be organised?

3.3 Price Band Indication

An alternative proposal that would deal with the difficulties outlined above would be to change from Price Point to Price Band indication for any new numbering scheme introduced for PRS. With this type of scheme there would be lower and/or upper price limits for a particular access code, within which prices can be set for individual services on a particular number.

A Price Band scheme would provide reasonable price indication to the user and would be considerably more flexible with regard to accommodating price changes in response to prevailing market conditions. It would also provide a framework for the introduction of new services that cannot be accommodated within the existing restricted scheme. A system of price bands would also align more closely with the recently adopted structure for Premium SMS Short codes⁶.

Any Price Banding regime would need to be open ended, user friendly and not overly complex, with Price Bands which coincide with the prices for the most widely used services.

Q. 3. Do you agree with a change from Price Point to Price Band indication for any new numbering scheme introduced for PRS?

3.4 Optimising Price Bands

A good starting point for the design of a potential Price Band structure is to consider what the optimal Price Bands might be. ComReg has given initial consideration to the Price Bands that could be used in any new numbering scheme for PRS having regard to:

- the existing Price Points
- the Price Bands for Value-added Text Messaging (SMS) Services

⁶ Premium SMS short codes are of the form 5BCDE, where higher values of B indicate higher price bands. Refer to ODTR document 02/14 – 'A Framework for Value-Added Text (SMS) Messaging Services – Response to Consultation'.

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- the selection of memorable end-point prices to define the bands
- the existing most widely used PRS
- providing for new services and future proofing.
- industry proposals for higher price options to cater for increased operational costs and inflation and to facilitate future service innovations.

The set of Price Bands listed in Table 2 could operate (as far as is practicable) if there were a decision in favour of price bands for PRS.

Price Band (incl VAT)		Corresponds to
1	Up to € 0.40	Corresponds to existing €0.33 per minute price point (1530).
2	€ 0.40 up to € 0.60	
3	€ 0.60 up to € 0.80	Corresponds to existing €0.74 per minute price point (1550).
4	€ 0.80 up to €1.00	Corresponds to existing €0.95 per minute price point (1560).
5	€ 1.00 up to € 1.40	Corresponds to existing €1.27 per minute price point (1570)
6	€ 1.40 up to € 2.00	Corresponds to existing €1.90 per minute price point (1580)
7	€ 2.00 up to € 2.50	Corresponds to €2.50 per minute lower price point proposed at NAP
8	€ 2.50 up to € 3.00	Corresponds to €2.90 per minute upper price point proposed at NAP
9	€ 3.00 or above	Allows for future high-value expansion
10	Variable	Adult services

Table 2: Proposed set of Price Bands for per-minute charged PRS

Q. 4. If a decision was taken to move to a Price Band structure, do you agree in general that the above set of Price Bands should be used (as far as is practicable) as a basis for deciding on the pricing structure for a new numbering scheme for PRS?

Q. 5. Assuming that you agree with the number of bands, do you agree with the band limits for each of the 9 bands? If not, what would be your preferred limits for each?

Moving from a Price Point to a Price Band scheme would require more billing system flexibility and would introduce changes to the procedures for agreeing retail and interconnect prices amongst operators and for sharing revenues between Operators and Service Providers. In theory, a Premium Rate Service Provider could agree a retail rate and a percentage revenue share with the 'hosting' network operator (i.e. the operator who terminates the calls). The revenue sharing model is generally a matter for commercial negotiation between the SP and host operator. The Hosting operator would then be responsible for informing all originating operators of the retail charge for the service/number.

A significant proportion of PRS calls originate on the *eircom* network or are transited by *eircom*. *eircom*'s interconnection charges for PRS are regulated by ComReg and are based on the costs of providing the interconnect service, including billing costs and provision for bad debt. In addition to *eircom*'s retail billing system being adapted to cater for price bands, interconnection billing would also require modification.

While ComReg believes that modern billing systems should be able to provide flexibility to set retail prices for individual services/numbers it realises that there may be practical limitations to offering complete flexibility on pricing to SPs. At one extreme, existing price points can continue to exist if a Price Band proposal is adopted, since they fall within the defined bands. At the other extreme, billing systems would have to cater for full digit analysis and the possibility of a price anywhere within the appropriate band. Such flexibility might create unsustainable levels of administration. Practically, what might be offered could be between the two extremes.

In addition, while the proposals in this consultation document offer more flexibility on retail pricing, ComReg is keen not to compromise price transparency for users and in particular that the pricing message in advertising remains unambiguous.

ComReg is keen to receive respondents' viewpoints on how these important issues could be addressed.

Q. 6. Do you foresee any practical implementation difficulties in moving to a Price Band based scheme? If so, please suggest what measures could be taken to overcome such difficulties.

Q. 7. In particular, how might the current pricing information (required by RegTel as part of any promotion of PRS) be improved to provide further transparency for callers in a Price Band based scheme?

3.5 Alternative options for a Price-Band based PRS Numbering Scheme

ComReg has identified two alternative approaches to developing a new Price Band based numbering scheme **for per-minute based PRS**. Both schemes would continue to use the existing numbering scheme format, i.e.

15YZ XXX XXX

The first approach ('Option 1') is to continue to use the existing access code format 15YZ, Z=0 and associate each of the codes with a price band which as far as practicable would be in alignment with the existing price points.

Price Band (incl VAT) Per Minute Pricing	Access Codes	Corresponds to
Up to € 0.40	1530+No	Corresponds to existing €0.33 price point (1530).
€ 0.40 up to € 0.60	1540+No	1540 will no longer represent drop charge services. See section 4 for proposed drop charge numbering
€ 0.60 up to € 0.80	1550+No	Corresponds to existing €0.74 price point (1550).
€ 0.80 up to €1.00	1560+No	Corresponds to existing €0.95 price point (1560).
€ 1.00 up to € 2.00	1570+No	Corresponds to existing €1.27 (1570) price point and €1.90 (1580) price point
€ 2.00 up to € 3.00	1580+No	Corresponds to €2.50 and €2.90 price points proposed at NAP
€ 3.00 or above	1590+No	Allows for future high-value expansion
Variable	1559+No	Adult Services only

Table 3: Proposed numbering scheme for Per Minute PRS – Option 1

With the proposal presented in Table 3 above, the access codes 1510 and 1520 are unused and ComReg proposes to utilise these codes for a new 'drop-charge' scheme⁷. This is detailed in the next section.

The second approach ('Option 2' - see Table 4, below) is to develop a numbering scheme based on the existing access code format 15YZ, Z=1 to 9 and Y=0, but to give preference to providing an optimised new solution rather than achieving alignment with the existing Price Points.

⁷ If this proposal is implemented it will be necessary to withdraw current allocations of 1520 numbers (none of which is in use at present).

Price Band (incl VAT) Per Minute Pricing	Access Codes	Corresponds to
Up to € 0.40	1501+No	Corresponds to existing €0.33 price point (1530).
€ 0.40 up to € 0.60	1502+No	
€ 0.60 up to € 0.80	1503+No	Corresponds to existing €0.74 price point (1550).
€ 0.80 up to €1.00	1504+No	Corresponds to existing €0.95 price point (1560).
€ 1.00 up to € 1.40	1505+No	Corresponds to existing €1.27 price point (1570)
€ 1.40 up to € 2.00	1506+No	Corresponds to existing €1.90 price point (1580)
€ 2.00 up to € 2.50	1507+No	Corresponds to €2.50 price point proposed at NAP
€ 2.50 up to € 3.00	1508+No	Corresponds to €2.90 price point proposed at NAP
€ 3.00 or above	1509+No	Allows for future high-value expansion
Variable	1559+No	Adult Services only

Table 4: Proposed numbering scheme for Per Minute PRS – Option 2

The decision on which scheme to be adopted will be informed by the responses to this consultation in addition to any consumer market research ComReg may undertake.

Q. 8. In the event of a Price Band based numbering scheme being introduced for per-minute based PRS, which approach (Option 1 or Option 2) do you prefer and is your comparative preference a strong, medium or marginal one?

Q. 9. Based on your stated preference, what changes or improvements would you like to have incorporated in such a scheme?

3.6 Adult Services

The current numbering scheme for PRS provides for Adult Services⁸ on Access Code 1559 set at a Price Point of € 0.74 per minute. It is proposed to retain the provision for Adult Services on Access Code 1559 but to change from the Price Point of € 0.74 per minute to a ‘Variable’⁹ Price Band to align with that which has recently been implemented for Value-added Text Messaging (SMS) Services. Access to adult services will require a PIN code, as before.

Q. 10. Do you agree with the proposal to retain the provision for Adult PRS on Access Code 1559 but to change from the Price Point of € 0.74 per minute to the Price Band “Variable”?

⁸ As defined and controlled by RegTel.

⁹ ‘Variable’ means no pre-set limits, although it would still be obligatory to state the price of the service in advertising/promotional material.

4 A Scheme for Flat Rate ('Drop Charge') Pricing

The current numbering scheme for PRS provides for Flat Rate pricing on Access Code 1540 set at a Price Point of € 0.58 per call (regardless of duration up to a practical limit). Up to now, Flat Rate Premium Services have not been widely used when compared with Per Minute services. The recent introduction of a numbering scheme for Value-added Text Messaging (SMS) Services with Per Message pricing may stimulate the market for competing PRS with Per Call pricing. Representations have recently been made to the NAP to increase the number of Per Call Price Points available for PRS.

The current provision for Flat Rate Premium Services is restrictive and ComReg proposes to expand the number of Access Codes and Price Bands for these services in the new scheme, having regard to the provisions in the scheme recently introduced for Value-added Text Messaging (SMS) Services.

ComReg has identified two alternative approaches to developing a new Price Band based numbering scheme **for per-call based PRS**. Both schemes would continue to use the existing numbering scheme format, i.e.

15YZ XXX XXX

The first approach ('Option A') is to continue to use the existing access code format 15YZ, Z=0 and utilise the 1510 and 1520 access codes for Flat Rate, as detailed in Table 5.

Price Band (incl VAT) Per Call Pricing	Access Codes	Corresponds to
Up to € 0.80	1510+No	Corresponds to existing €0.58 price point (1540).
€ 0.80 or above	1520+No	

Table 5: Proposed numbering scheme for Flat Rate PRS – Option A

The second approach ('Option B') presented in Table 6 and could also be adopted for Flat Rate Premium Services.

Price Band (incl VAT) Per Call Pricing	Access Codes	Corresponds to
Up to € 0.40	1511+No	
€ 0.40 up to € 0.60	1512+No	Corresponds to existing €0.58 price point (1540).
€ 0.60 up to € 0.80	1513+No	
€ 0.80 up to €1.00	1514+No	
€ 1.00 up to € 1.40	1515+No	
€ 1.40 up to € 2.00	1516+No	
€ 2.00 up to € 2.50	1517+No	
€ 2.50 up to € 3.00	1518+No	
€ 3.00 or above	1519+No	

Table 6: Proposed numbering scheme for Flat Rate PRS – Option B

Q. 11. If your preference was for Option A, do you agree with the ComReg proposal in Table 5 to expand the number of Access Codes with Price Bands for Flat Rate Premium Services?

Q. 12. If your preference was for Option B, do you agree with the ComReg proposal outlined in Table 6 to expand the number of Access Codes with Price Bands for Flat Rate Premium Services?

Q. 13. Based on your stated preference, what changes or improvements would you like to have incorporated in such a scheme?

5 International Access to Non-Geographic Numbers

5.1 Background

Non-geographic numbers with the dialling formats 15XX XXX XXX (PRS) and 18XX XXX XXX (i.e. Freephone 1800 and shared Cost 1850/1890) cannot currently be accessed from outside Ireland. This is because the first digit “1” in the Nationally Significant Number is the NDC Code for Dublin. The issue of global access to these numbers has been considered in previous Consultations/Decision Notices¹⁰ and it was decided then that a sufficient case had not been made for changing the Dublin code to provide access to the “1XXX XXX XXX range of non-geographic services.

The Numbering Advisory Panel has also discussed this issue, in particular with regard to commercial arrangements:

- the routing of calls to Premium Service Providers in Ireland from abroad would require special arrangements to be put in place so that Service Providers could recover their costs – these commercial arrangements could be complex, difficult to agree and difficult to manage
- adequate fraud prevention measures would have to be put in place
- the potential impact of duplication between international access to National PRS and International PRS (using ITU country code 979) and/or a recently proposed European PRS scheme (using ETNS) would also have to be considered.

Currently, if an Irish Service Provider wishes to offer PRS in another country without establishing a presence in that country, ComReg understands that it could typically use a ‘bureau’ facility to host the service in the country behind a Premium Rate number from that country’s numbering scheme, or simply arrange to have the call delivered to Ireland over a private circuit. Such arrangements have the advantages that access is guaranteed, the service is recognised by the country’s callers as being Premium Rate, and the interconnection and revenue-sharing models are straightforward.

Whilst being able to physically host the service in Ireland may have its advantages, there would undoubtedly be extra costs in routing the call internationally on public networks¹¹ for termination here, and this may offset any such advantages. In addition, it is likely that Irish SPs are primarily interested in targeting the UK market for language and cultural reasons, and economies of scale may dictate that the service would be hosted in the UK, but also provide access to the Irish market, rather than vice-versa (the UK numbering scheme does not prevent this, in theory).

The possibility of internationally accessible PRS is undoubtedly of concern to content regulators including RegTel. Currently, there are wide variances in national content regulation requirements. Services targeted at children are prohibited in a number of Member States. Sexual entertainment, live services and other chat services are similarly restricted in some countries. In addition, there are clearly issues relating to social tolerance (e.g. on sexual entertainment

¹⁰ Most recently in Decision Notice D11/01 – ODTR Doc. No. 01/58

¹¹ Foreign originating operators would recognise the +353 preceding the PRS number as an international call destined for Ireland, and route it accordingly.

services), economic issues (e.g. the application of spend limits for various categories of service) and consumer information issues (e.g. where pricing rules vary enormously – with some countries requiring pricing information on connection to PRS while others accept print or online information). Additionally, opening up access in this way also poses problems for circumventing call barring which employers or parents had intentionally put in place.

It is not clear how existing services could meet differing national requirements or how issues of jurisdiction could be resolved, but any internationally accessible Premium Rate regime would need to address such issues and other sectoral constraints in an effective manner. If these issues were not addressed effectively, it is possible that abuse of such facilities would damage the mainstream PRS market.

Practical difficulties aside, the European Union has introduced a new set of Directives for the Regulation of electronic communications, four of which are effective from July 2003. This includes the Universal Service Directive¹² that, inter alia, requires that callers from one Member State shall be able to access non-geographic numbers in another Member State, *where technically and economically feasible*, and where the called party has not placed limitations on access for commercial reasons (Article 28).

5.2 Providing an EU-wide dialling procedure for access to Irish PRS numbers

Notwithstanding the obvious commercial, content regulation and practical difficulties to providing international access to Irish PRS, ComReg considers that the requirement in the Universal Service Directive places an onus on it to consider whether the Irish Numbering Scheme may impose a barrier to EU-wide access to non-geographic numbers in Ireland.

In theory, there appear to be two generic routes to provide international access, each with varying levels of cost, complexity and desirability from a business perspective. In considering these or any other options to facilitate international access, it is important to weigh the marginal PRS opportunity against the cost and inconvenience of implementation and potential confusion that could be caused:

- **Retain the 15XX XXX XXX format.** International callers would be instructed to place +353 in front of the number, which arguably allows for simplified domestic/EU advertising. As mentioned, the approach of changing the Dublin NDC from 1 to 3 has been previously rejected by ComReg because of the high costs and disruption of a number change on the scale of Dublin and foregoing the use of code “3” for alternative uses such as additional geographic or non-geographic codes.

An alternative approach would be to consider reclaiming several existing Dublin ranges in the 5XX XXXX block and require more detailed analysis in International gateway exchanges. However, provision has been made in the numbering plan for Dublin to use prefix 5 for Dublin South MNA numbers in the event of a requirement to expand capacity by

¹² Directive 2002/22/EC of the European Parliament and of the Council of 7th March 2002 on universal service and users’ rights relating to electronic communications networks and services, Official Journal L108, 24/04/2002

Review of the Premium Rate Services Numbering Scheme changing from 7 to 8 digit numbers. This requires that certain 5X ranges including 52, 54, 55 and 56 must be reserved for expansion. In addition, the withdrawal of number blocks from the Dublin numbering capacity could trigger a Dublin number change which would otherwise not be required. ComReg therefore considers such an outcome may be disproportionate simply to facilitate international access to PRS.

- **Change the access code.** Using a separate access code in place of (or alongside) 15XX might facilitate more familiar numbering for foreign callers, and also maintain the 5XX XXXX ranges for possible Dublin expansion. One possibility might be to put in place an international dialling procedure for access to Premium Rate Numbers using a spare 9X National Destination Code, in line with the international trend to use 9X numbers (See Appendix I). For example, the 92 code is currently used for Ballinrobe but will be taken out of service before the end of 2003 and will be available for reuse at the end of 2004. The dialling format for access to PRS could then be:

National 15XX XXX XXX

EU-wide+353 92XX XXX XXX

The number length will be 13 digits including country code. This is less than the longest number length currently in use (fixed diallable mailbox services can be 14 digits in length) in the Irish Numbering Scheme. The main disadvantage of this approach is that elements of 9X will continue in use for the geographic numbering scheme¹³ in Ireland for the foreseeable future, potentially causing confusion for callers.

Q. 14. Bearing in mind the above discussion, do you consider that ComReg should put in place a dialling procedure to permit EU-wide access to Irish Premium Rate Numbers?

Q. 15. In the event of ComReg putting in place a dialling procedure for EU-wide access, what are your views on the option to provide access to existing numbers by performing additional analysis, while utilising part of the Dublin expansion ranges?

¹³ NDCs of the form 9X are used in areas of Counties Galway, Mayo and Sligo. After the 2003 Number Changes Athlone, Roscommon, Ballinsloe, Castlerea and Ballghaderreen will also use NDCs of the form 9X.

Q. 16. In the event of ComReg putting in place a dialling procedure for EU-wide access, what are your views on the option to reuse National Destination Code “92”?

Q. 17. In the event of National Destination Code “92” being used for EU-wide access, should a national dialling procedure of the form 092XX XXX XXX be opened in addition to 15XX XXX XXX, with or without a plan for gradual migration towards a long term “9” or “92” only scheme for PRS?

Q. 18. Can you identify any other options to provide EU-wide access to PRS?

6 Implementation of a new numbering scheme for PRS

In drawing up the alternative numbering options for PRS, ComReg has had regard to the transition arrangements to migrate from the existing scheme.

For Per Minute services, Option 1 would mean that most services on € 1.90 / Code 1580 will probably have a price increase to fit the new Price Band €2.00 up to €3.00 for code 1580, whereas Option 2 requires that the new sets of Per Minute codes would be introduced, services would be migrated onto the new codes and use of the old codes would be phased out

For Option A, existing Flat Rate services (few or none) on code 1540 will have to change to 1510 or 1520, while Option B would require the new sets of Flat Rate codes to be introduced, services would be migrated onto the new codes and use of the old code (1540) would be phased out.

The actions required for each option are set out in Table 7 below. It is envisaged that either of the options could be implemented within short time frames (less than 3 months) after the decisions are made.

	Option 1	Option 2	Option A	Option B
1	Review of pricing for existing services on Code 1580/ € 1.90 resulting in either a change from code 1580 to 1570 or price increase to € 2.00 up to € 3.00.	Introduction of new Per Minute codes 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508 and 1509, with Price Banding.	Formal confirmation notice to number range holders that access code 1520 is no longer available for Premium Services at a Price Point Rate of € 0.33 per minute.	Introduction of new Flat Rate codes 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518 and 1519, with Price Banding.
2	Introduction of Price Banding on existing codes 1530, 1540, 1550, 1560, 1570 and 1580.	Migration of Per Minute services onto new codes and phasing out of the use of old codes (1520), 1530, 1540, 1550, 1560, 1570 and 1580.	Introduction of Flat Rate codes 1510 and 1520, with Price Banding.	Migration of Flat Rate services onto new codes and phasing out of the use of old code 1540.
3	Introduction of additional 1590 Per Minute code, with Price Banding.		Changeover of existing flat rate services on 1540 to 1510 and 1520.	
4	Formal confirmation to number range holders that the pricing associated with code 1559 for Adult Services has changed from €0.74 to Variable Price	Formal confirmation to number range holders that the pricing associated with code 1559 for Adult Services has changed from €0.74 to Variable Price		

Table 7: Implementation of new numbering scheme for PRS

Q. 19. In the event of a Price Band based numbering scheme being introduced for PRS, do you agree with the outline implementation actions for each of the options set out in Table 7 and are there any additional actions required?

Q. 20. ComReg considers that any option could be implemented in less than 3 months. Do you agree with these timescales? If you do not agree, what timescales do you consider should apply and why?

Q. 21. What additional measures do you consider might be required to ensure maximum tariff transparency for consumers in response to the introduction of a PRS numbering scheme based on Price Bands with per-minute charging?

Q. 22. What measures do you consider might be required to ensure maximum tariff transparency for consumers in response to the more wide spread availability of PRS with per-call charging?

7 Allocation process and National Numbering Conventions

Premium Rate Numbers are allocated by ComReg to licensed Network Operators in blocks of 1,000 for non-bursty usage and in blocks of 100 for bursty usage (Bursty format = Code + 71 + XXXX). Numbers are available for allocation from a six-digit numbering space behind each respective PRS access code but it is common for Service Providers to request allocation of the same number behind each of the access codes so as to have unique use of such a number (which may have alphanumeric significance).

ComReg proposes to retain the existing allocation procedures for PRS numbers, including the retention of bursty ranges on 71 XXXX. It would be prudent for Network Operators seeking allocations to apply for the same block in each of the PRS number ranges to cater for migration of individual services to higher or lower priced ranges, subject to sufficient numbering resources continuing to be available.

To facilitate such migration going forward, when an operator has made a secondary allocation to an SP, the equivalent number in the balance of the ranges could be reserved for that SP – at the explicit request of the SP in writing. If the SP subsequently chooses to change operator and to port its active number(s), the reserved numbers should also be made available for porting, using the ‘Pre-Allocation Porting Process’ as defined by industry. (Written confirmation from the SP that a request was made to reserve such numbers is required as part of this process). However, ComReg appreciates that in some cases where numbers are already allocated, it may not be possible to retrospectively apply this proposal.

Finally, the National Numbering Conventions will be revised to reflect any changes to the access codes for PRS and/or the rules governing their usage resulting from this consultation.

Q. 23. Do respondents agree with the retention of the existing numbering allocation procedures and ComReg’s proposal to facilitate service migration to higher price bands? If you do not agree, please state your reasons, offering alternatives if possible.

8 Submitting Comments

All comments are welcome, but it would make the task of analysing responses easier if comments were referenced to the relevant question numbers from this document.

The consultation period will run from 28th February 2003 to 28th March 2003 during which the Commission welcomes written comments on any of the issues raised in this paper. All responses to this consultation should be clearly marked “Reference: Submission re ComReg 03/27”, and sent by post, facsimile or e-mail, to arrive on or before 5pm on 28th March 2003, to:

FREEPOST

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Having analysed and considered the comments received, ComReg will review the PRS Numbering Scheme and publish a report in April 2003 on the consultation which will, *inter alia* summarise the responses to the consultation.

In order to promote further openness and transparency ComReg will publish the names of all respondents and make available for inspection responses to the consultation at its Offices.

ComReg appreciates that many of the issues raised in this paper may require respondents to provide confidential information if their comments are to be meaningful. Respondents are requested to clearly identify confidential material and if possible to include it in a separate annex to the response. Such information will be treated as strictly confidential.

Appendix I

The table below lists the access codes used in some European countries for PRS.

Country	PRS Access Code	Comments
United Kingdom	090X – content based services 091X – non content services	Prices set by operator
Finland	0700 – entertainment and adult services 0600 – information services	
Germany	0900	Were moved from 0190 access code in May 2002
Luxemburg	900, 901, 905	Access codes for Shared Revenue Services
Holland	0800-1, 0800-2, 0800-3, 0800-400, 0800-500, 0900	Paid information services
Spain	900	Used for automatic reverse charging
Sweden	710, 711 – 72 900, 939, 944	'7' codes to be removed will be replaced by '9' codes
Switzerland	0900, 0901, 0906	
Austria	0900, 0930	
Belgium	77, 90	
Denmark	90	
Greece	0909 – Adult services 0901 – other	