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Rialáil Cumarsáide
Commission for
Communications Regulation

Review of Utility Non-Geographic Numbers Extension

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Consultation

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Contents

Section	Page
1 Executive Summary	7
1.1 Background	9
1.2 Structure of Consultation	12
2 Evidence Gathering	13
2.1 Call Volumes	13
2.2 Stakeholder Engagement	15
2.3 Market Research	19
3 Assessment of evidence	22
3.1 Counterfactual	22
3.2 Call volume data	24
3.3 Market Research	29
3.4 ComReg's overall assessment	41
3.5 Summary of Conclusions	46
4 Recommendations and next steps	48
4.1 Recommendations and next steps for phasing out the Utility NGNs	48
5 Consultation Questions	49

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Annex

Section	Page
Annex 1: For Information Only - Other Extended NGNs	51
Annex 2: Call Volumes [PARTIALLY REDACTED]	53

NON-CONFIDENTIAL

Table of Figures

Section	Page
Figure 1: Implementation of ComReg’s 2018 NGN Decision.....	10
Figure 2: Percentage of total calls to GNI’s emergency NGNs (Jan 2021 to Jan 2023)	26
Figure 3: Percentage of total calls to ESBN’s emergency NGNs (Jan 2021 to Jan 2023)	27
Figure 4: Percentage of calls to Irish Water’s 1800 Freephone NGN (Jan 2021 to Jan 2023)	28
Figure 5: Call Volumes to Gas Networks Ireland’s main emergency NGNs (January 2021 – January 2023) [REDACTED].....	53
Figure 6: Call Volumes to ESBN’s emergency NGNs (January 2021 – January 2023) [REDACTED].....	55
Figure 7: Call Volumes to Irish Water’s priority contact numbers (January 2021 – January 2023) [REDACTED]	56

NON-CONFIDENTIAL

Tables

Table	Page
Table 1: Utility NGNs	11
Table 2: The Legacy Utility NGNs and replacement 1800 Freephone Numbers	14
Table 3: Key Weather Events between January 2021 and January 2023	15
Table 4: Quantitative Sample	20
Table 5: Qualitative Sample	21
Table 6: Legacy NGNs in use by HSE, Irish Rail and Tunstall Emergency Response ..	51
Table 7: Share of calls to GNI Emergency NGNs (January 2021, 2022, and 2023) [<PARTIALLY REDACTED>]	54
Table 8: Share of calls to other GNI Utility NGNs (January 2021, 2022, and 2023) [<PARTIALLY REDACTED>]	54
Table 9: Share of Calls to ESNB emergency NGNs (January 2021, 2022, and 2023) [<PARTIALLY REDACTED>]	55
Table 10: Share of Calls to Irish Water's priority NGNs (January 2021, 2022, and 2023) [<PARTIALLY REDACTED>]	56

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1 Executive Summary

- 1.1 This consultation presents the findings of ComReg's Review of the Utility NGNs¹ Extension, proposes steps and recommendations for the numbers in the period before the NGN Extension Deadline on 30 November 2023, and sets out ComReg's preliminary proposals for the numbers.
- 1.2 ComReg's proposal, as set out in this Consultation paper, is not to extend the permitted use of Utility NGNs beyond 30 November 2023.
- 1.3 The Review is an evidence-based review, designed and conducted to inform a decision on whether any further extension to the operation of any of the Utility NGNs may be required. ComReg has assessed several pieces of evidence, including but not limited to:
- Data on the general public's engagement with the six legacy Utility NGNs e.g., call volumes;
 - Market research to determine how the public would likely react in the event of an incident; and
 - Other available and relevant evidence provided to it from interested parties and stakeholders.
- 1.4 ComReg seeks views on its findings and proposals for the Utility NGNs and will consider submissions to this Consultation before deciding on a final way forward for the Utility NGNs.
- 1.5 ComReg's preliminary findings from its Review indicate that:
- (i) If a member of the public is unable to contact a utility to report a potential emergency/incident they will persist in reporting the emergency/incident and will seek alternative numbers to call if they cannot get through to the first number they try.
 - (ii) Most people will look online to find the numbers to call to report the emergency/incident.
 - (iii) There is little reliance on printed materials for finding numbers to call, and there is also reluctance to approach physical assets to find numbers.
 - (iv) If the incident is serious enough and time is of the essence, members of the public will call the emergency services.

¹ "Utility NGNs" are six numbers in use by utility services in Ireland, namely ESB Networks ("ESBN"), Gas Networks Ireland ("GNI") and Irish Water ("IW") as set out in Table 1 of this Consultation Paper.

1.6 In addition, ComReg points out that:

- (a) The continued operation of these legacy numbers has the potential to generate confusion regarding NGNs and this should be averted so that the benefits of the improved NGN platform are fully realised as soon as possible. As well as the potential for continued confusion, there are network costs for operators in keeping these legacy numbers operational.
- (b) Emergency contact numbers should only be provided via 1800 Freephone numbers. Members of the public should not have to pay to report a potential emergency/incident to the utilities, as is currently the case with the 1850 and 1890 legacy numbers.
- (c) The utilities have already put in place replacement 1800 Freephone numbers to be used to report emergencies/incidents.
- (d) Call volumes to the legacy Utility NGNs have been in steep decline since 2021 and call volumes to the replacement 1800 Freephone numbers now account for over 85% of emergency/priority calls for each of the utilities.
- (e) There are still eight months until the NGN Extension Deadline and the utilities can use that remaining time to put in-call announcements in place on the legacy Utility NGNs, to indicate that the legacy NGNs are changing and to identify the new numbers to call. There is also time to run additional direct and widespread communications campaigns to further inform the public of the new replacement 1800 Freephone numbers to call to report utility related emergencies/incidents.

1.7 ComReg's preliminary proposal for the Utility NGNs is to proceed as planned with the cessation of the Utility NGNs from 30 November 2023. The full rationale behind this preliminary proposal is set out in this document.

1.8 ComReg recommends the following actions for the utilities for the coming months in terms of phasing out the Utility NGNs:

- Arrange with their terminating operator to put in-call announcements on the legacy Utility NGNs now, to indicate the new 1800 Freephone numbers to call for the services. In this way callers can learn and start using the new numbers before the numbers are switched off at the end of November 2023.
- Advertise and communicate the replacement 1800 Freephone numbers as widely as possible immediately. ComReg's research reveals that 83% of people check online when looking for business phone numbers.²

² [ComReg 18/90a](#): Market Research - Consumer behaviour regarding finding phone numbers

Updating websites and online business contact details is therefore a priority. Other assets and materials (e.g., vehicles, leaflets, and brochures), especially those that are widely visible (e.g., vans), should also be updated. Third party references should also be checked and updated to only refer to the 1800 Freephone numbers. For reference, ComReg has published a useful checklist for organisations on updating communications materials.³

- Consider switching off the legacy Utility NGNs in advance of 30 November 2023 (e.g., by end August 2023) so that any issues may be fully addressed before the numbers are switched off fully by all telecoms operators at the end of November 2023.

1.1 Background

- 1.9 Non-Geographic Numbers (“NGNs”) are telephone numbers beginning with 1800, 1850, 1890, 0818 and 076. These numbers are used by organisations to provide services such as helplines, public services, and banking. Unlike geographic (landline) numbers (e.g., 01 for Dublin or 061 for Limerick), an NGN does not relate to a particular geographic area.
- 1.10 In 2018 ComReg introduced measures to improve the NGN platform in Ireland. ComReg’s NGN Decision⁴ set out two measures to address the high cost of calling NGNs and the widespread confusion around the five different NGN ranges in operation at that time.
- 1.11 The first measure, “Geo-linking Condition”, addressed the high cost of calling 1850, 1890, 0818 and 076 NGNs. Since 1 December 2019, a call to an 1850, 1890, 0818 or 076 NGN costs no more than calling a landline number. If landline calls are included in your “bundle of call minutes” then NGN calls are also “in bundle”. No separate charge applies for any NGN call (unless you have used up or do not have a bundle of call minutes).
- 1.12 The second measure, “NGN Consolidation”, reduced the number of NGN ranges from five (1800, 1850, 1890, 0818 and 076) to two (1800 and 0818), to eliminate widespread confusion about the different NGN ranges. The 1850, 1890 and 076 number ranges were withdrawn from operation from 31 December 2021 (“NGN Consolidation Deadline”). Only the 1800 and 0818 NGN ranges now remain in

³ <https://www.comreg.ie/media/2021/09/Comms-Checklist-COMREG-Service-Provider-210921.pdf>

⁴ [ComReg 18/106 and D15/18](#): Review of Non-Geographic Numbers – Response to Consultation 18/65 and Decision D15/18

operation.⁵ Figure 1 shows the timeline for the implementation of the NGN Decision.

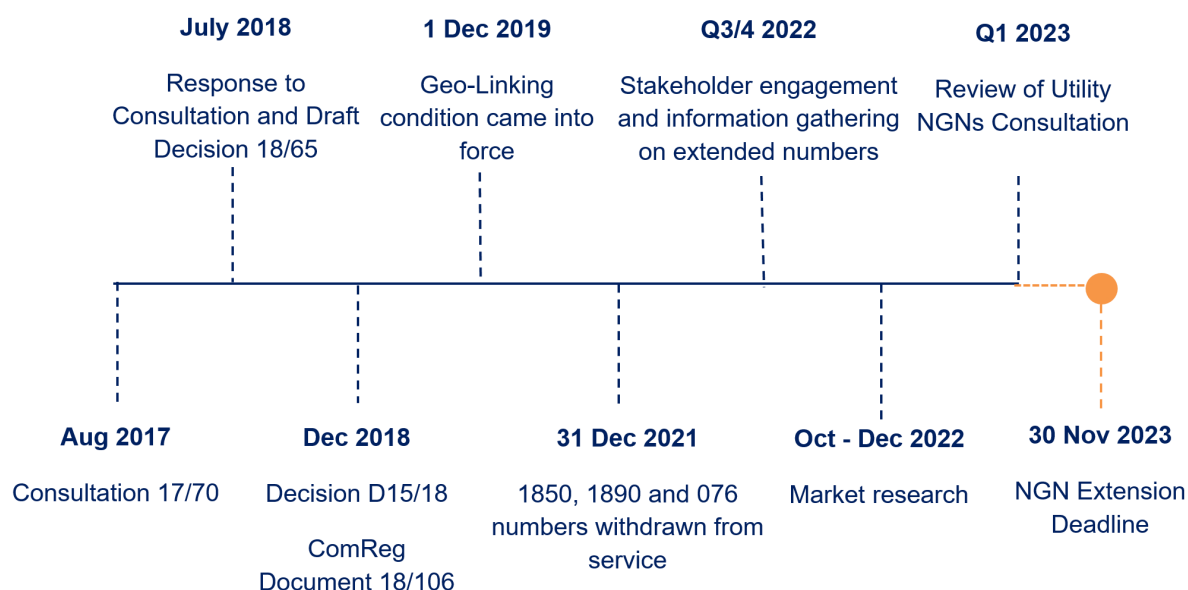


Figure 1: Implementation of ComReg's 2018 NGN Decision

- 1.13 A small quantity of 1850 and 1890 NGNs were permitted, exceptionally, to remain in operation beyond the December 2021 deadline, due to the nature of the numbers as emergency contact numbers and/or their prevalence on physical assets around the country (e.g., on wooden poles and utility meters).
- 1.14 These extended NGNs include six numbers in use by utility services in Ireland, namely ESB Networks (ESBN), Gas Networks Ireland (GNI) and Irish Water (IW) (see Table 1). These six NGNs are called the "Utility NGNs". In July 2021, following public consultation, ComReg decided that the Utility NGNs could remain in operation until 30 November 2023 ("NGN Extension Deadline"). This deadline is now just eight months away. This Consultation focuses primarily on the Utility NGNs and the NGN Extension Deadline.⁶

Organisation	Utility NGN	Description
ESB Networks (ESBN)	1850 372999	ESB 24/7 line for 'Faults', 'Emergencies' and 'Outages'
Gas Networks Ireland (GNI)	1850 205050 1850 427747 1850 211615	Gas Emergency Line Dial Before You Dig ("DBYD") SCADA

⁵ All 1850, 1890 and 076 numbers have been withdrawn from service, except for a small number of 1850 and 1890 NGNs permitted to remain in operation until 30 November 2023.

⁶ An information piece on Other Extended NGNs that are in use by the Health Service Executive (HSE), Irish Rail and Tunstall Emergency Response is included in Annex 1.

Irish Water	1850 278278 1890 278278	Numbers to report a 'water issue', particularly if deemed urgent
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Table 1: Utility NGNs

- 1.15 ComReg outlined in Document 21/75⁷ that it would conduct a review to determine if any further extension, beyond 30 November 2023, may be needed for any of the six Utility NGNs set out above. The intervening period has provided time to collect evidence regarding the behaviour of the public in reporting utility incidents/emergencies, to engage with the relevant stakeholders in question, and to conduct ComReg's Review of Utility NGNs (the "Review").
- 1.16 ComReg Document 21/75s⁸ contains the submissions received in response to the Consultation 21/28 on the proposed extension for the Utility NGNs and on the proposed evidence-based review. ComReg refers the reader to these documents for further details.
- 1.17 Important factors to be considered at the outset of this Consultation are:
- Between 2019 and the original NGN Consolidation Deadline, at the end of 2021, ComReg ran several wide-reaching and extensive consumer and business focussed communications campaigns, to inform the public of the cessation of the 1850, 1890 and 076 number ranges.⁹ These campaigns included digital and social media campaigns (Twitter, Facebook, and LinkedIn), as well as national newspaper and radio ads. ComReg also created dedicated NGN webpages¹⁰ directed at both consumers and organisations explaining the NGN improvements.
 - ComReg's NGN communication campaigns proved very effective in raising awareness that the 1850, 1890 and 076 number ranges have been withdrawn from service. Against that, the continued operation of some 1850 and 1890 NGNs may lead to continued confusion and uncertainty which should be averted.
 - Consistent with the project's primary rationale, ComReg strongly maintains that a caller's capability to make emergency-type calls should not be reliant on them having sufficient call credit or funds to pay for such calls, as is currently the case

⁷ [ComReg 21/75](#): Review of the Numbering Conditions of Use and Application Process – Response to Consultation 21/28, Decision and Further Consultation (Decision D06/21).

⁸ [ComReg 21/75s](#): Review of the Numbering Conditions and Application Process – Submissions to Consultation 21/28

⁹ ComReg's extensive NGN assets are listed at <https://www.comreg.ie/industry/licensing/numbering/ngn-review/>

¹⁰ www.comreg.ie/ngn

with the 1850 and 1890 Utility NGNs. For this reason, 1800 Freephone numbers are clearly far more suitable and safer for emergency-type calls.

1.2 Structure of Consultation

- 1.18 This Consultation document sets out ComReg's findings in relation to the Review, and its preliminary assessment on a way forward for the remaining legacy Utility NGNs. This document opens with a short background to the improvements to the NGN platform, progress thus far and the various timelines. ComReg then presents the evidence gathered during this Review, after which it undertakes its assessment, including an examination of the counterfactual versus current state of play and the interplay of the data and behavioural evidence. Finally, ComReg concludes with a summary of its findings, preliminary conclusions as to whether to continue as planned with switching off the Utility NGNs at the end of November 2023, and recommendations for each of the Utility NGNs.
- 1.19 Annex 1 is for information only and relates to the Other Extended NGNs.
- 1.20 Annex 2 contains additional data on call volumes provided by the terminating operator(s) of the Utility NGNs.

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2 Evidence Gathering

2.1 In Document 21/75, ComReg set out that it would conduct an evidence-based review to assess whether an extension to the operation of the Utility NGNs beyond 30 November 2023 would be appropriate. This chapter outlines the evidence gathered and how ComReg has used it to inform its assessment of whether any further extension may be necessary (See Chapter 3). The evidence has three principal elements and is presented as follows:

- Section 2.1 presents call volume data for the Utility NGNs in percentage form;
- Section 2.2 describes the key points from various stakeholder engagements conducted during 2022; and
- Section 2.3 describes the market research (commissioned by ComReg and conducted by RED C) on people's behaviours towards NGNs and utility related emergency scenarios.

2.1 Call Volumes

2.2 In September 2022, ComReg requested information on call volumes from the following:

- i. The terminating operator(s) of all six of the legacy Utility NGNs; and
- ii. Each of the utility operators¹¹ (ESBN, GNI and Irish Water), including clarification on the classification of calls in terms of their 'emergency' nature.

2.3 ComReg decided to mostly rely on the call volume data sourced from the terminating operator(s) for each of the utilities because this data is the most complete across the time series requested. Data received from the utilities were, in several instances, missing entries and/or covered a shorter timeframe.¹² The terminating operator(s) data is full and complete and allows for comparisons across relevant time periods. A follow up request was issued to the terminating operator(s) for each of the utilities in February 2023, to update the data before the publication of this consultation and to complete the dataset up to January 2023. Call volume data was collected for all the

¹¹ Specifically, the requests to the utility operators related to call volumes and classifications. ComReg requested, for each month of the last three years, where available, the total number of calls to the legacy NGN 1850/1890 number and for each month since activation of the number, the total number of calls to the new Freephone number 1800 number. ComReg also requested the split of calls into those classified as emergency and non-emergency and an explanation of how the utility classifies emergency and non-emergency calls. In addition, ComReg requested suggestions on specific questions or topics that the utility considered should be covered/ included in ComReg's market research for the project.

¹² For non-missing entries, the discrepancies between the utility data and the terminating operator(s) data were minor and, in many cases, an exact match to that provided by the terminating operator(s).

numbers set out in Table 2.

Number	Number type	Utility Operator
1850372999	[LEGACY] ESNB 24/7 line for 'Faults', 'Emergencies' and 'Outages'	ESB Networks
1850205050	[LEGACY] Gas Emergency Line	Gas Networks Ireland
1850427747	[LEGACY] Dial Before You Dig ("DBYD")	Gas Networks Ireland
1850211615	[LEGACY] SCADA	Gas Networks Ireland
1850278278	[LEGACY] Number to report 'water issue', particularly if deemed urgent	Irish Water
1890278278	[LEGACY] Number to report 'water issue', particularly if deemed urgent	Irish Water
1800372999	ESNB 24/7 line for 'Faults', 'Emergencies' and 'Outages'	ESB Networks
1800205050	Gas Emergency Line	Gas Networks Ireland
1800427747	DBYD	Gas Networks Ireland
1800211615	SCADA	Gas Networks Ireland
1800278278	Number to report 'water issue', particularly if deemed urgent	Irish Water

Table 2: The Legacy Utility NGNs and replacement 1800 Freephone Numbers

- 2.4 The call volume data refers to the monthly number of terminated calls between January 2021 and January 2023 for each of the eleven numbers listed in Table 2¹³, which comprises six legacy numbers and five replacement 1800 numbers.¹⁴ An

¹³ ComReg sought the total number of terminated calls per month for each of the legacy Utility NGNs since December 2018 and the total number of terminated calls for each of the replacement 1800 numbers for each month since activation of those numbers. The terminating operator(s) for each of the utilities provided data from September 2020 for some of the numbers, and January 2021 for the rest of the numbers. For simplicity and consistency ComReg will use the figures between January 2021 and January 2023 throughout.

¹⁴ Irish Water is consolidating its two legacy Utility NGNs into one 1800 number.

analysis of call volumes is provided in Chapter 3.¹⁵

- 2.5 Due to the nature of utility emergencies and incidents, there is seasonality evident within the dataset. The winter months are characterised by higher call volumes due to typically more adverse weather conditions, which are likely to result in more incidents that require reporting.¹⁶ Making year-on-year comparisons helps minimise the seasonality issue, however, some seasonality and anomalies may remain. Table 3 details the main weather events (as categorised by Met Éireann) that occurred during the period under assessment.

Date	Weather Event
26 November 2021	Violent Storm Arwen
7 December 2021	Violent Storm Barra
18 February 2022	Violent Storm Eunice

Table 3: Key Weather Events between January 2021 and January 2023¹⁷

2.2 Stakeholder Engagement

- 2.6 In addition to requesting the utility operators provide information on call volumes, ComReg engaged in a series of bilateral meetings with each of the utilities concerned (ESBN, GNI and Irish Water) and also with the sectoral regulator, the Commission for Regulation of the Utilities (“CRU”).
- 2.7 These meetings focussed on the utilities’ progress in migrating from the legacy Utility NGNs, general updates on replacement signage, rebadging of assets and utility meters, and progress on updating other materials (including relevant third-party materials).
- 2.8 During these meetings ComReg acknowledged that, although the emergency contact numbers need to be treated with caution, ultimately, the utilities have a responsibility to make progress on updating signage and rebadging assets/meters etc. with the replacement 1800 Freephone numbers as appropriate.
- 2.9 A summary of ComReg’s engagement with the CRU and each of the utility operators

¹⁵ In relation to GNI numbers, very low volumes of calls were recorded for two of the numbers, namely the ‘Supervisory Control and Data Acquisition’ (“SCADA”) number(s) and the ‘Dial Before You Dig (“DYBD”)’ number(s), in comparison to the general emergency/incident line.

¹⁶ This is reflected in the call volume data received, wherein on average, in November, December, January and February have higher volumes of calls than during the summer months, across the utilities.

¹⁷ <https://www.met.ie/climate/major-weather-events>. This time frame was selected as it corresponds with the time period for which the terminating operator(s) was able to provide call volume data for the relevant numbers.

is provided below.

2.2.2 Commission for Regulation of Utilities (CRU)

2.10 ComReg met with the CRU on 15 July 2022 and several matters were discussed, including:

- The importance of using 1800 Freephone numbers to avoid the risk of certain members of the public being unable to report an actual or suspected incident (for example, some pre-pay mobile users could run out of credit, or already be out of credit, when an emergency call needs to be made). ComReg welcomed the introduction of replacement 1800 Freephone contact numbers by the three utilities concerned.
- ComReg noted that the overarching purpose of the NGN Consolidation measure is to restore trust and confidence in NGNs and that the continued operation of legacy NGNs could cause unnecessary confusion to persist.
- ComReg asked the CRU to request all energy suppliers, retailers and relevant third parties to urgently advertise the new 1800 Freephone emergency contact numbers for ESB Networks, Gas Networks Ireland, and Irish Water. The CRU undertook to raise this matter through the most appropriate channels and to pursue with the relevant parties.

2.11 ComReg continues to liaise with the CRU in relation to the utility NGNs. In February 2023 ComReg further requested the CRU to request the utilities, third party utility suppliers and retailers to update their assets, websites and printed materials with the replacement 1800 Freephone numbers for ESB Networks, Gas Networks Ireland and Irish Water.

2.2.3 ESB Networks (ESBN)

2.12 ComReg met with ESBN on 12 September 2022. ESBN clarified several matters:

- ESBN categorises all calls to its emergency contact numbers, and that all calls relating to potential injury/loss of life are prioritised. ESBN noted that when callers select 'emergency' at the initial Interactive Voice Response ("IVR") menu option, calls are connected to an operator. Callers selecting other options, such as 'fault', are generally subject to further IVR automation.
- ESBN replaced the legacy 1850 emergency number on its website some time ago. ESBN indicated that it has resources allocated to dealing with ensuring that third parties also update to the 1800 Freephone replacement number.
- ESB has been promoting the 1800 replacement number through customer care

channels and resources have been made available to prioritise the placement of the 1800 Freephone number on ESB vehicles.

- Work on replacing the legacy 1850 number on physical assets is ongoing. In terms of physical asset replacement numbers, ESNB highlighted that the biggest and more onerous task in this regard was the ESB street cabinets - the maintenance cycle for which is typically four years. ESNB indicated that it does not intend to replace the legacy number on poles/pylons, and that such assets will not display any contact number in the future – this is to discourage members of the public from approaching them.

2.13 ComReg continues to maintain an open dialogue with ESNB.

2.2.4 Gas Networks Ireland (GNI)

2.14 ComReg met with GNI on 25 August 2022. In relation to progress on the replacement of legacy 1850 numbers, GNI outlined that:

- All GNI website information has been updated to show only 1800 numbers;
- Advertisements highlighting the 1800 205050 number have been active for approximately 18 months;
- All vehicle livery was updated by the end of 2021; and
- All new gas meter installations now display the 1800 205050 number.

2.15

[REDACTED]

[REDACTED]

2.16

[REDACTED]

[REDACTED]

2.17 GNI stated that it can provide information relating to call classification, by call centre agents (for example, which calls resulted in the despatch of an engineer, which calls were general enquiries etc.), although noted that such call classification does not generally apply to calls made to the Dial Before You Dig numbers (1850 42 77 47 and 1800 42 77 47).

2.18 GNI subsequently provided suggestions regarding ComReg's market research, that ComReg took on board in the design and the conduct of the market research for its Review. GNI raised concerns with the research methodology proposed by ComReg, in particular, the online nature of the market research. To address these concerns ComReg commissioned an additional qualitative aspect of market research, which encompassed interviews (in the form of focus groups), including those from older age groups¹⁸ and those recruited based on being less likely to have confidence in the use of the internet. For additional detail on the methodology of the market research see sections 2.3.2 and 2.3.3 below.

2.19 ComReg continues to maintain an open dialogue with GNI.

2.2.5 Irish Water

2.20 ComReg last met with Irish Water on 25 August 2022.

2.21 At this meeting Irish Water explained that calls made to the Irish Water legacy Utility NGN(s) generally do not relate to an emergency, insofar as no imminent risk to life and/or property is normally perceptible. Rather, Irish Water noted that the contact number is typically used for operational purposes and to report service failings. Irish Water therefore suggested that, in the context of the relevant Irish Water Utility NGNs, "emergency" be replaced with a different term such as "priority".

2.22 Irish Water provided clarification on several matters:

- Irish Water stated that inbound calls are not classified per se, but that calls relating to potentially high impact events (for example, an incident affecting multiple properties), or those concerning vulnerable customers, are prioritised.
- Irish Water has replaced its legacy 1850 / 1890 numbers on its website and is proactively engaging with all relevant stakeholders to ensure that only the replacement 1800 278278 number is promoted/advertised going forward.
- In relation to physical assets, Irish Water outlined that signage is mainly present at wastewater treatment sites and noted that approximately [X ██████████ ██████████ X] total signs have now been updated to show the 1800 278278 number. Irish Water estimated that the remaining signs would be updated in the coming 2-3 months.
- Irish Water further stated that it wished to continue to work with ComReg to ensure that when it is time to remove the legacy 1850 and 1890 numbers from service, this is done in a controlled manner and according to appropriate

¹⁸ Whom GNI noted would be less confident in using the internet and therefore more likely to rely on a hard copy source (which may give the 1850 number).

guidance.

2.23 ComReg continues to maintain an open dialogue with Irish Water.

2.3 Market Research

2.24 The purpose of the market research was to inform ComReg about how and when people are likely to contact the utility services, namely ESBN, GNI and Irish Water, in the event of a potential emergency, or where a utility related incident needs to be reported. The research was carried out to determine what the public know about NGNs, what their experience of using such numbers is, and to gauge reactions to a range of potential scenarios.

2.25 The research aimed to examine the behavioural response of the public in the event where they dialled a utility NGN to report an incident but were unable to get through. This enabled ComReg to assess what people would be likely to do if they dialled a legacy 1850 or 1890 number after the November 2023 NGN Extension Deadline when these calls would no longer be connected.¹⁹

2.26 The research was conducted by RED C Research & Marketing Ltd. (“RED C”)²⁰ and comprised of the following:

- a quantitative, survey-based component used to collect evidence regarding behaviour and engagement with the utility NGNs and to inform ComReg of the behavioural response of the population (using a nationally representative sample); and
- a complementary qualitative component, which was conducted via focus groups and examined people’s experience of using NGNs and the likely behavioural response of members of the public to a range of emergency-type scenarios concerning gas, water, and electricity.

2.27 The focus groups included older cohorts of the population, particularly those less likely to be technologically aware. This was to take account of those who may be less likely to go online to find a phone number and addressed concerns raised by GNI in terms of the market research methodology.

2.3.2 Quantitative Survey

2.28 All surveys were conducted online using RED C’s online panel RED C Live. RED C

¹⁹ Notably, neither quantitative or qualitative participants were informed of the abolition of 1850 and 1890 numbers and at no point in the research was this alluded to – as to not impact the responses to questions. Respondents were not informed of the NGN Consolidation, the Utility NGN extension or the upcoming NGN Extension Deadline so as to not bias the results.

²⁰ RED C is an Irish provider of research-based consultancy services. See <https://www.redcresearch.ie/>

Live consists of over 40,000 participants, recruited by online and offline means. The fieldwork was conducted in October 2022, over the course of two weeks and quota controls were applied across gender, age, social class, and region to ensure a representative sample of Republic of Ireland (ROI) adults.

- 2.29 An initial nationally representative sample of just over 1,000 ROI adults was carried out and a further 300 interviews were conducted among gas customers (see Table 4). The results were then weighted back to known proportions of gas versus non-gas customers in Ireland, to achieve a final, nationally representative sample of 1,307 ROI adults (in line with the latest CSO projections²¹).
- 2.30 The inclusion of additional gas customers ensured that enough gas customers were included in the sample to allow for re-weighting back to a nationally representative sample, whilst also having sufficient information on the likely behavioural responses of gas customers to a gas incident within the home.
- 2.31 The research will be referenced throughout as “RED C Utility Non-Geographic Number Survey Results” (“the survey”). The results of the survey have been published alongside this consultation, as ComReg Document 23/27a.

Group	Number of Respondents	Share
Gas customers	392	30%
Non gas customers	882	67%
Don't know	33	3%
Total Sample	1307	100%

Table 4: Quantitative Sample

2.3.3 Qualitative Focus Groups

- 2.32 The four qualitative focus groups were carried out after the main survey was completed, and took place during December 2022, both online and face to face.
- 2.33 The focus groups allowed for a more in-depth examination of likely behavioural responses and how perceptions of and reactions to the ‘emergency’ differs across the scenarios. In particular, the focus groups provided a platform to delve deeper into the issue of persistence (in reporting) and whether an incident is likely to go unreported if a number (e.g., legacy NGN) was no longer operational.²² The

²¹<https://www.cso.ie/en/releasesandpublications/ep/p-syi/statisticalyearbookofireland2021part1/people/demography/>

²² ComReg notes the small sample size (an issue inherent to sub-questions in survey-based research) for certain subsets – particularly on questions designed to investigate persistence. The qualitative research

discussions during the sessions and insight gained from the responses of attendees adds additional evidence and richness to the analysis and assists ComReg in building a fuller picture upon which to base its conclusion(s).

- 2.34 Unlike the main survey sample, which was nationally representative and weighted, the samples for the focus groups intentionally recruited amongst older age cohorts, as outlined in Table 5 below. The face-to-face group was recruited based on participants who identified as being less comfortable with using the internet and were therefore potentially less likely to go online and would be at more risk of relying on physical materials on which the legacy number may be displayed (e.g., paper bills, stickers, handwritten notes).

Group	Age	Gas Supply	Tenure	Area	Format	Participants
1	35-49	Gas customers	Homeowner	Dublin	Online	8
2	50-64	No requirement	Council/Social Housing	Athlone	Online	6
3	65+	No requirement	Renter/Homeowner	Cork	Online	8
4	75+	Gas customers	Homeowner	Dublin	Face to Face	7

Table 5: Qualitative Sample

subsequently aimed to investigate the questions subject to small sample sizes in greater detail, to inform ComReg on the likely behavioural response of the public and to bolster the survey findings.

3 Assessment of evidence

3.1 The purpose of this assessment is to determine whether the use of these Utility NGNs be withdrawn as planned on 30 November 2023 (and signalled three years ago, providing five years in total for migration) or if additional time should be provided. This chapter considers the call volume data, insights from engagement with the various stakeholders and the complementary evidence gathered via the survey and focus groups, which together inform ComReg's preliminary decision.

3.2 ComReg divides its assessment into four main parts.

- Section 3.1 sets out the counterfactual that would have applied in the absence of ComReg's NGN Decision in 2018. This is provided as a reference point to compare the outcome likely to arise after 30 November 2023 with what actually pertained prior to the NGN Decision.
- Section 3.2 assesses the call volume data described in Section 2.1. This allows ComReg to determine the extent to which calls have already migrated from the legacy Utility NGNs to the replacement 1800 Freephone numbers.
- Section 3.3 assesses the detailed market research, conducted on ComReg's behalf by RED C, to determine how the general public report potential emergency situations - including how people react when they are unable to get through to a number to report a potential incident.
- Section 3.4 sets out ComReg's preliminary view based on its assessment of the information at hand.

3.1 Counterfactual

3.3 It is important to note that ComReg's 2018 NGN Decision was not made in a vacuum and was necessitated by a variety of long-standing problems with the NGN platform including:

- Excessive retail charges for NGN calls, and
- Poor public understanding and awareness of the different NGN ranges, their characteristics, and associated charges.

3.4 The problems associated with NGNs (including those used by the utilities, are set out in detail in ComReg Document 18/106).²³ For ease of reference, ComReg

²³ [ComReg 18/106 and D15/18](#): Review of Non-Geographic Numbers, Response to Consultation 18/65 and Decision

summarises those aspects that are relevant to outlining the counterfactual for its assessment. These include (i) the charges associated with 1850 and 1890 numbers and (ii) perceptions and behaviour in relation to 1850 and 1890 numbers.

Charges for 1850 and 1890 numbers

3.5 Before 2018, the Utility NGNs were in the 1850 and 1890 ranges:

- For 1850 calls, the caller paid a fixed retail charge while the called party paid a charge for receiving the 1850 call. 1850 calls made from a mobile could have cost up to five times more than such calls made from a fixed line - e.g., typically €0.30 per call from a mobile and €0.06 per call from a fixed-line. In some cases, the retail charge was higher depending on the Originating Operator's (OO's) standard rate for a 5-minute call to a Geographic Number (GN).
- For 1890 calls, the caller was charged at a per-minute rate – as with 1850 calls, while the called party also paid a charge for receiving the 1890 call. 1890 calls typically cost up to five times more from a mobile than from a fixed-line – e.g., €0.35 per minute from a mobile and €0.069 per minute from a fixed-line. Again, and in some cases, the retail charge was higher depending on the OO's standard per minute rate for a call to a GN.

3.6 Furthermore, 1850 and 1890 calls were not included “in bundle”.²⁴ Therefore, regardless of a consumer's phone plan, calls to the Utility NGNs always had a direct charge.

3.7 People who made calls to the Utility NGNs would have additional charges on their bill (for bill-pay customers) or reduced credit (for pre-pay customers). If a pre-pay customer did not have credit/sufficient credit, they would be unable to connect to a Utility NGN, noting that at that time (prior to 2018) pre-pay customers accounted for around 60% of all mobile subscriptions.²⁵

Perceptions and behaviour towards NGNs

3.8 It was highlighted during the consultation process and associated research²⁶ that retail charges which were known to be relatively high, or for which there was uncertainty on, may likely impact on peoples' understanding and consequent actions. For example:

- 52% and 48% respectively thought calls to 1890 and 1850 numbers were

²⁴ “In-bundle” is where calls to certain classes of numbers are included as free call minutes up to a number of inclusive minutes as part of a consumer's telephone subscription for a headline fee.

²⁵ As of Q1 2016 pre-pay subscriptions accounted for 57% of all mobile subscriptions in the State (ComReg Quarterly Key Data Report figures).

²⁶ See for example ComReg Document 18/106

expensive.²⁷

- 31% and 28% respectively would avoid using 1890 and 1850 number ranges primarily due to confusion about the cost of the call.²⁸

3.9 ComReg found that the 1890 range had a particularly poor reputation. ComReg noted that the 1890 number had become “toxic” and that many avoided dialling 1890 NGNs. ComReg agreed with its economic consultant DotEcon’s overall assessment that “...there is sufficient evidence to suggest that the 1890 range may have become ‘toxic’ and there are good reasons for phasing this number out”.²⁹

Counterfactual conclusion

3.10 Therefore, prior to 2018, there was a risk of calls not being made to the Utility NGNs for the following reasons:

- i. Charging for calls to emergency numbers increased the risk that such calls would not be made, a risk that was likely higher for potential emergencies outside the home, where callers may choose to avoid the risk of incurring costs e.g., by assuming someone else would report the issue.
- ii. Even if a prepay customer decided to report a potential emergency using the 1850 or 1890 number, there was a risk that such a call may not have been connected due to lack of or insufficient credit.
- iii. Some customers likely decided not to make calls because the associated charges were perceived as too high and/or they had a high level of distrust in the 1850 and/or 1890 numbers.

3.11 This is not to say that emergencies would go entirely unreported because of these issues. Clearly there were other means of contacting the utilities and/or reporting emergencies. However, the issue of customers not being able or willing to make calls was clearly a problem in using the 1850 and 1890 ranges for emergency contact numbers.

3.2 Call volume data

3.12 ComReg previously described the call volume data in Section 2.1 above. While ComReg considered the absolute call volumes, month on month and year on year

²⁷ [ComReg Document 17/70b](#), slides 48 & 49

²⁸ [ComReg Document 17/70b](#), slides 85 & 87

²⁹ ComReg engaged DotEcon Ltd (“DotEcon”) to develop models to inform ComReg’s understanding of the NGN platform during the period leading up to the 2018 Decision. For more details on this see [ComReg Document 17/70a](#); Report from DotEcon on Non-Geographic Numbers in Ireland and [ComReg Document 18/65a](#); DotEcon Response to Document 17/70

comparisons, the key metric of interest here is the extent to which calls have migrated from legacy Utility NGNs to the replacement 1800 Freephone numbers. ComReg compares the most recent data available (January 2023) with the same period over the past two years (January 2021 and January 2022) to control for seasonality, noting that, regardless of the period chosen, the overwhelming majority of calls have now successfully migrated to the new 1800 Freephone numbers.

- 3.13 For all legacy Utility NGNs, there has been a significant migration to the new 1800 Freephone numbers, even if there remains a small cohort of people who continue to dial the legacy Utility NGNs. The volume of customers still dialling the legacy Utility NGNs varies across the three utilities, with the 1850 ESNB number receiving the most calls to its legacy Utility NGN. ComReg provides details below for each of the utilities main emergency number.
- 3.14 ComReg notes that the volume of calls made to the other legacy Utility NGNs (namely the GNI 'Supervisory Control and Data Acquisition' (SCADA)³⁰ number(s) and the 'Dial Before You Dig (DYBD) number(s) are very marginal [REDACTED] and continue to decline.
- 3.15 SCADA is used by GNI to manage the flow of gas from the entry points to the end consumer. It uses telemetry data from all the operational sites to monitor the system. The grid controllers' monitor alarms on the network on a 24/7 basis via SCADA. The test line (1850 211 615/1800 211 615) is automatically dialled by SCADA every 7 mins. Data analysed by ComReg indicates that SCADA calls are now exclusively carried out on the 1800 replacement number.³¹
- 3.16 The DYBD number is operated by GNI to allow the public, builders and contractors to check for the location of gas pipes, for instance, in circumstances where they are about to commence construction or excavation work. The phone service is complemented by both an email and online service³². [REDACTED] and the distribution of calls between the 1800 and 1850 DBYD numbers has changed from 10:90% in January 2021 to 74:26% as of January 2023.

³⁰ <https://www.gasnetworks.ie/docs/corporate/gas-regulation/GNI-Systems-Performance-Report-2019.pdf>

³¹ ComReg therefore notes the absence of risk or operational related issues accompanied by switching off the legacy SCADA number as planned in November 2023.

³² <https://www.gasnetworks.ie/home/safety/dial-before-you-dig/>

The provision of alternative means of contact (i.e., email and online) mitigates the risk of members of the public, builders or contractors not being able to get in contact with GNI to check the location of gas pipes because they find and dial the legacy number.

GNI (Gas)

3.17 The GNI main emergency numbers are 1800 205050 (1800 Freephone number) and 1850 205050 (legacy Utility NGN). These lines are 24/7 emergency lines, designed to be used if a member of the public smell or are concerned about gas (inside or outside the home). Between January 2021 and January 2023, the number of calls on the 1850 GNI emergency line fell by 83% [redacted], while the share of total emergency calls attributable to the 1850 number fell from 99% to just 10%.

3.18 As illustrated in Figure 2, most emergency calls to GNI are now being made to the replacement 1800 number (green bars). Over the period, the number of calls to the 1800 number increased to [redacted] with the proportion of total emergency calls attributable to the 1800 number increasing from 1% to around 90%. Overall, the volume of Freephone calls has risen continually since January 2021, whereas the 1850 calls are in decline.

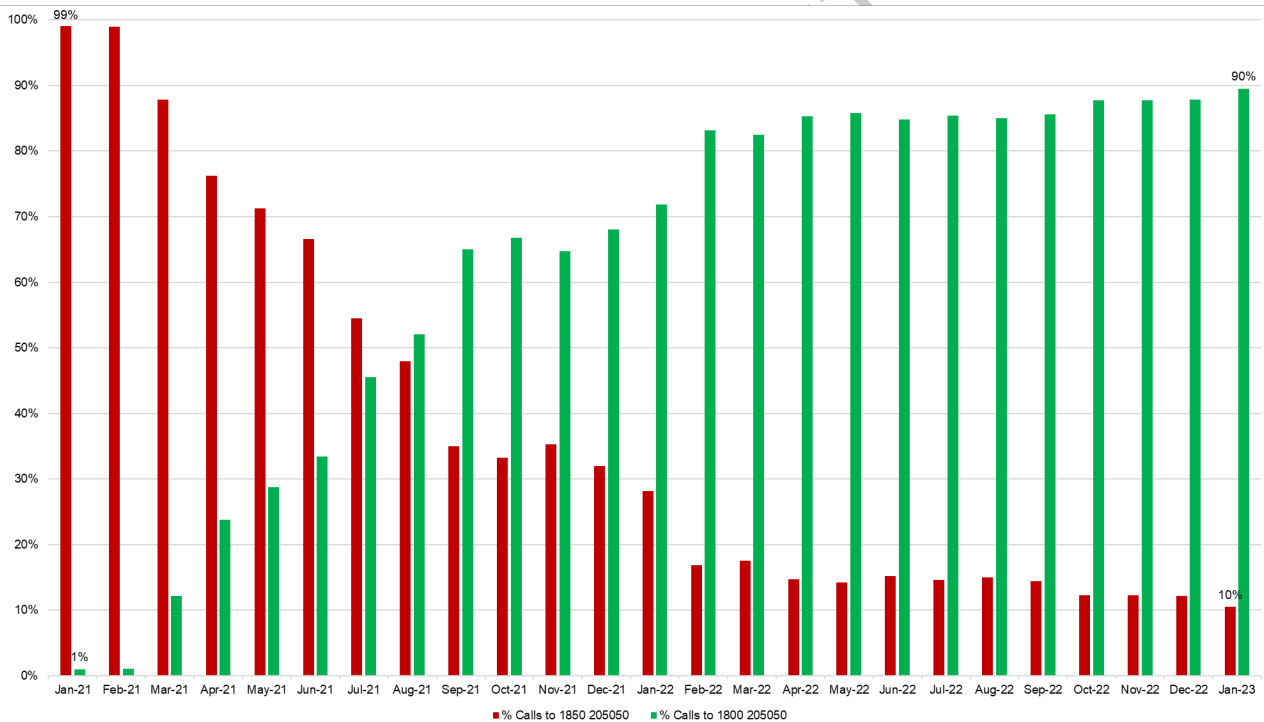


Figure 2: Percentage of total calls to GNI’s emergency NGNs (Jan 2021 to Jan 2023)

Source: Based on Call Volume Data from Terminating Operator

ESBN (Electricity)

3.19 ESB Networks main emergency lines are 1800 372999 (1800 Freephone number) and 1850 372999 (legacy Utility NGN). Like GNI, there has been a strong migration from ESB’s legacy 1850 number to the replacement 1800 Freephone number, even though the volume of calls remaining on the legacy 1850 number is higher than for gas, [redacted] per month. Nevertheless, this represents a fall of 56% [redacted] compared to the same period in 2022, with a similar decline of around [redacted] (or 38%) the year before (2021). As illustrated in Figure 3, the proportion of total emergency calls attributable to the 1800 number has increased from 32% to more than 85%. Over the last two years calls to the 1850 line have fallen by 70% and now constitute just 14% of total calls to ESB’s emergency lines.

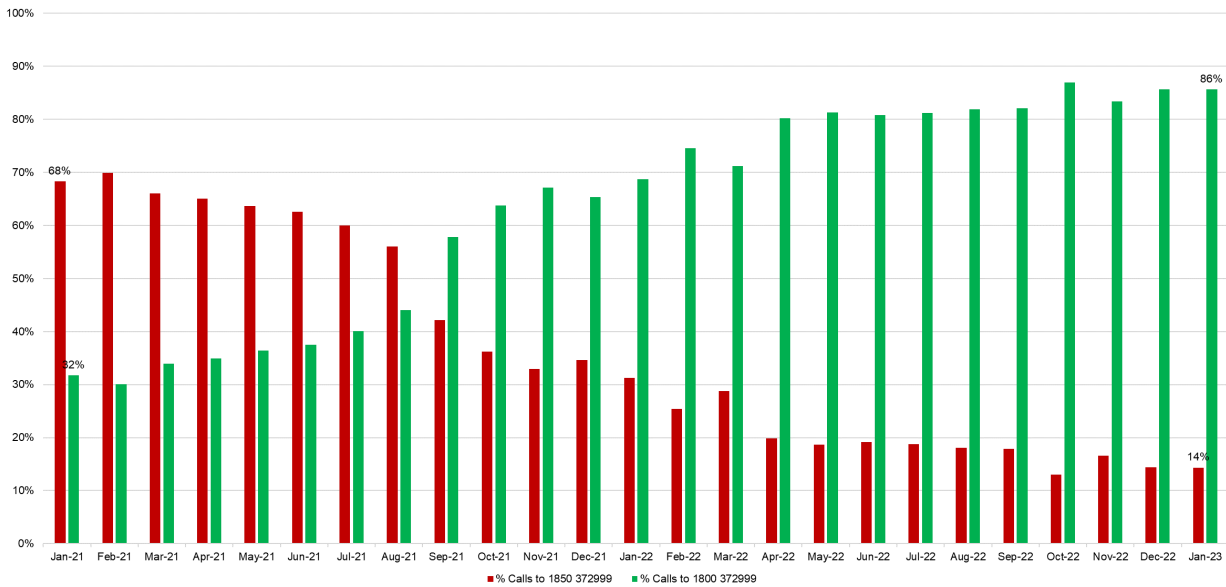


Figure 3: Percentage of total calls to ESB’s emergency NGNs (Jan 2021 to Jan 2023)

Source: Based on Call Volume Data from Terminating Operator

Irish Water

3.20 There has been a substantial migration from both of Irish Water’s legacy Utility NGNs. As illustrated in Figure 4, most calls to Irish Water are now being made on the replacement 1800 Freephone number (1800 278278). Over the last two years, calls to the 1850 NGN have fallen by a noteworthy 94% from [redacted] per month to [redacted] which constitutes just 3% of total calls to Irish Water’s priority numbers. Over the same period, calls to the 1890 NGN have fallen by 59% from [redacted] calls per month to [redacted] and now constitute only 2% of total calls to Irish Water’s priority numbers.

3.21 As illustrated in Figure 4, the proportion of total emergency calls attributable to the

1800 number has increased from a standing start to an impressive 95% over the last two years. During the same period, calls to the 1850 and 1890 lines have fallen to just 3% and 2% of all calls respectively.

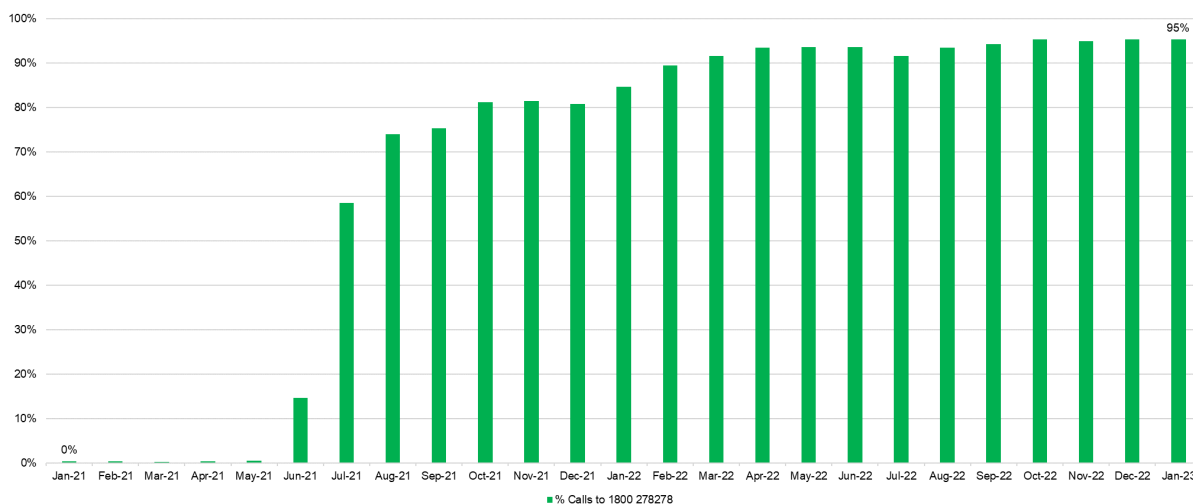


Figure 4: Percentage of calls to Irish Water's 1800 Freephone NGN³³ (Jan 2021 to Jan 2023)

Source: Based on Call Volume Data from Terminating Operator

Overall Conclusion on Call Volumes

3.22 There has been a pattern of significant migration away from the legacy Utility NGNs for each of the utilities since 2021 which is a credit to all concerned. There are now less than [X [REDACTED] Y] calls per month being made to GNI and Irish Water's legacy NGNs. There have been similar reductions for ESBN, although call volumes to ESBN's legacy Utility NGN are higher than the other utilities, at around [X [REDACTED] Y] calls per month (partly arising from the higher number of overall calls made to ESBN). However, each of the previous two years showed an average drop of around [X [REDACTED] Y] [REDACTED] Z] a year for ESBN – indicating that further declines are likely before 30 November 2023.

3.23 There remains a further eight months before the Utility NGNs are due to be switched off, time during which the number of calls being made to the legacy 1850/1890 numbers will continue to decline. This migration thus far has occurred, in large part, due to the efforts of each of the utility operators to promote the new numbers. Continued promotion (particularly in the case of the ESBN) is required to minimise further the number of calls to legacy Utility NGNs between now and 30 November

³³ With the rest of the calls being made to the legacy 1850 or 1890 NGNs

2023.

3.3 Market Research

- 3.24 The volume of calls to the legacy Utility NGNs will continue to decline in the period up to 30 November 2023. However, it is likely that a small number of calls will continue to be made to legacy Utility NGNs after the NGN Extension Deadline of 30 November 2023.
- 3.25 The **main policy issue** for consideration in this section is to determine how the general public contact the utilities in the event of a potential emergency and what actions (if any) would be taken in the event they could not get in contact with the relevant utility.
- 3.26 Likely reactions to potential emergencies (in home and out of home) were considered for gas, electricity, and water. The findings were reasonably consistent across age groups and demographics, with most people opting to report an incident.³⁴ However, reactions depended on several factors, including the location of incident, which utility was relevant and who else was present. Other key points include:
- Online search was the main means of finding a phone number. The preference to speak to a person to report a potential emergency was also high.
 - There was a high level of persistence to report emergencies. People would not dial the same number more than once or twice if they couldn't get through, after which the majority would google to find the number for the relevant emergency/utility or instead would call 999/112.
 - Limited use of printed materials such as stickers and leaflets to find a number - even among older cohorts.
 - Most respondents would be reluctant to approach a physical asset to look for a number to call and would, quite reasonably, be concerned about their personal safety.
- 3.27 ComReg sets out below the key points³⁵ from each of the six scenarios assessed to by RED C (i.e., in the home and outside the home for each of the three utilities). Each scenario follows the same analytical structure which addresses the relevant policy issue of how people contact the utilities in the event of a potential emergency/incident

³⁴ ComReg notes that focus group attendees reinforced the findings of the survey and consistently reported looking online for numbers – irrespective of age group, location or demographic.

³⁵ Readers are referred to Document 23/27a, published alongside this Consultation for more detailed findings.

and what actions (if any) would be taken in the case of not getting through to the relevant utility by phone.

- i. First, ComReg assesses who respondents would report a potential emergency to in the first instance (e.g., the utility provider, 999/112, etc.).
- ii. Second, ComReg assesses where respondents who report to the utility provider would locate the number to call (in the first and subsequent instances).
- iii. Third, ComReg assesses the likely action respondents would take if they could not get through to the relevant utility (e.g., because they had dialled a legacy number).

3.28 ComReg then describes the qualitative research which complements the quantitative research in addressing the relevant policy issues.

3.29 Finally, ComReg provides its conclusion on the market research against the main policy issues described above.

Gas

Gas incident in the home

3.30 In terms of potential gas incidents inside the home, ComReg highlights the following key points from the quantitative research:

- i. As a first response³⁶, 68% of respondents state that they would ring the GNI emergency number³⁷. The remaining responses all involve situations where the potential emergency would be reported or the Freephone number would be found via alternative means (e.g., 12% would ring their gas provider, 5% would ring the emergency services and 7% would check online for who best to contact).³⁸
- ii. 68% of respondents would check online first to locate the GNI emergency number³⁹, increasing to 89% as any one of their first three actions.⁴⁰ Between 3% and 12% of people find the number where the legacy number may persist,

³⁶ This is referred to as 'First Mention' in the RED C Survey Results.

³⁷ Throughout the survey the utility numbers were not explicitly referenced (i.e., in terms of the actual number e.g., 1800 20 50 50) but rather referred to under general terms such as the 'GNI emergency number' and 'ESBN emergency number'.

³⁸ RED C Utility Non-Geographic Number Survey Results Slide 16 (n = 730)

³⁹ RED C Utility Non-Geographic Number Survey Results Slide 17 (n = 595). Other options include checking a utility bill (16%), see Slide 17 for the relevant breakdown.

⁴⁰ This is referred to as 'Any mention' in the RED C Survey Results. 'Any mention' refers to options selected by respondents as any one of their possible actions – up to a maximum of three.

for example from a physical asset or written down at home.⁴¹

- iii. In terms of the action a person would take if they could not get through to the utility (e.g., if they dialled a legacy number), 34% would look for an alternative number for the relevant utility (of which 69% would look for this number online⁴²) and 29% would call a different emergency service (e.g., 999, 112) or agency.⁴³ Only 5% would persist in calling the same number multiple times – a response explored further in the qualitative research, where specific scenarios were presented.

3.31 In the qualitative research, RED C, among other matters, further explored how people would react if the number dialled failed to connect. RED C observed the overwhelming majority would not re-dial the same number more than once, if they could not get through to the utility, and they would either ring 999 or google to find an alternative number for the utility. Where time was of the essence (i.e., where the incident was considered serious in nature), they would quickly call 999.⁴⁴

3.32 There was a very high level of awareness of the GNI television/radio advertisements and the associated procedures/advice to follow when there is a smell of gas. Reporting a gas incident inside the home was seen as very important and something people would take seriously. Other observations from the qualitative research included:

- The single most common response across age groups was to google to find the number/utility to call.
- Strong sense of urgency to get the incident reported. Speaking to somebody was deemed very important in comparison to reporting an incident via other means e.g., webchat or email.
- Very few would search for a number on a leaflet/bill, sticker, or a gas meter. Very few have a pre-saved number for a utility supplier in their mobile phone or written down.
- Some limited recall of 'Be Winter Ready' brochure⁴⁵ which was kept in a 'safe

⁴¹ Just 3% of people get the number from a physical asset. Separately, around 7% have the number written down at home, and another 5% have the number saved on their phone. However, a proportion of these people would likely have already updated such references to the new Freephone number. In the focus groups, amongst those who answered that they would consult a number saved in their phone/written down, when asked to clarify, all had the 1800 number(s) on record.

⁴² RED C Utility Non-Geographic Number Survey Results Slide 19 (n = 246)

⁴³ RED C Utility Non-Geographic Number Survey Results Slide 18 (n = 730)

⁴⁴ RED C Utility Non-Geographic Number Survey Results Slide 20

⁴⁵ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/93383/f3ef6ac0-a4cf-4419-96d8-ae095a27b193.pdf#page=null>

place' and referred to for emergency numbers.



I would google straight away – no time to waste calling into a neighbour and if there was no answer on the phone, I would just call 999.

Conclusion: Gas incident in the home

- 3.33 ComReg notes that people have a high sense of urgency to report gas incidents inside the home. The overwhelming majority would search for the number to call in areas where the replacement 1800 Freephone number should now be available (e.g., online, on utility bill) or report to the emergency services (e.g., 999). For the small number of people that would use sources where only the legacy Utility NGN may persist, there are alternatives they are willing to use and are likely to refer to as one of the steps they would take (as per the results for Any Mention).
- 3.34 Further, in the event of a member of the public not being connected due to dialling a legacy Utility NGN, the vast majority of respondents are aware of alternative means where the 1800 Freephone emergency number would be found (e.g., an online search). Respondents also indicated that they would use the 999 emergency number as an alternative where they experienced issues in connection. The qualitative research (where people were asked to consider certain scenarios) found no evidence of people abandoning the reporting of a gas emergency in the event of difficulties in getting connected to the relevant utility.
- 3.35 Therefore, ComReg is of the preliminary view that people have many options to report potential gas emergencies in the home and would be highly likely to continue to do so even where a legacy number, such as a Utility NGN, was used in the first instance.

Gas incident outside the home

- 3.36 Gas incidents outside the home elicited a similar response to those inside the home, although there was less of a sense of urgency in reporting incidents. Reactions varied depending on where the gas was smelt (i.e., outside on street, in a busy area or not, near home or not). From the quantitative research:
- i. 72% of respondents would ring the GNI emergency line. The remaining responses all involve situations where the potential emergency would be reported, or the Freephone number would be found (15% would ring the emergency services and 6% would go online to search for who best to

contact.)⁴⁶

- ii. 78% of respondents would check online first, as a means of locating the GNI emergency number, increasing to 91% as any one of their first three steps⁴⁷. Between 3% and 4% of people would get the number where the legacy number may persist.⁴⁸
- iii. In terms of the action a person would take if they could not get through to the utility (e.g., if using a legacy number), 29% would look for an alternative number for the relevant utility and 38% would call a different emergency service (e.g., 999) or agency, if they could not get through to the utility on a particular contact number.⁴⁹ Only 5% would persist in calling the same number – this was explored further in the qualitative research where specific scenarios were presented.

3.37 In the qualitative research, there was a clear need for urgency in reporting – with only a small minority opting to report later that day or when they got home. Importantly, and of central relevance to this consultation, where a decision was made to report an incident, people’s behaviour is similar to that for incidents inside the home. For example:

- Online search was the main method used to find a number (similar to the in home scenario).
- Where there is a need to report, there is a strong sense of civic duty to do so (and be persistent in doing so).
- More likely to call 999 as the incident is in a public/common area, in comparison to an in home incident.
- Reluctance to approach a physical asset – over personal safety concerns.



I would be unlikely to spend a lot of time looking for the right number to call and probably more likely to default to emergency services if unsure about what number to call.

⁴⁶ RED C Utility Non-Geographic Number Survey Results Slide 23 (n = 1307)

⁴⁷ RED C Utility Non-Geographic Number Survey Results Slide 24 (n = 1119).

⁴⁸ RED C Utility Non-Geographic Number Survey Results Slide 24 (n = 1119). Just 4% of people get the number from a physical asset. Separately, around 3% have the number written down at home, and another 3% have the number saved on their phone. However, a large proportion of such people would likely update such reference points to the new Freephone number.

⁴⁹ RED C Utility Non-Geographic Number Survey Results Slide 25 (n = 730). 74% would look for an alternative number online, 11% on a bill and 7% on a meter or physical asset (Slide 26, n = 214).

Conclusion: Gas outside the home

- 3.38 ComReg notes that although the tendency to report potential emergencies outside the home is high, some nevertheless tend not to report these incidents. However, where people are willing to report, and wish to make a call, there are various options available, such that a potential emergency would be unlikely to go unreported – even if the legacy number (i.e., Utility NGN) was initially dialled.
- 3.39 Again, the overwhelming majority would search for a number in areas where the replacement 1800 Freephone number would be found (e.g., online). Respondents demonstrated an understandable reluctance to approach physical assets and there was a higher likelihood of dialling 999 in the event of an emergency. There was no evidence of people abandoning the reporting of an emergency where there were difficulties in getting connected to a utility - people would generally source an alternative number online or dial 999.
- 3.40 Therefore, ComReg is of the preliminary view that people have many options to report potential gas emergencies outside the home and would be highly likely to do so even where a legacy number, such as a Utility NGN, was used in the first instance.

Electricity

Electricity incident in the home

- 3.41 An incident involving electricity in the home is often assumed to be the responsibility of the homeowner and therefore many respondents indicated they would call an electrician. For more serious incidents, people think of informing ESB, although there was some confusion/lack of knowledge regarding the distinction between ESB and ESB Networks. From the quantitative research:
- i. As a first response, 47% of respondents stated that they would ring the ESB emergency line. The remaining responses all involve situations where the potential emergency would be reported, or the Freephone number would be available.⁵⁰
 - ii. 65% would check online as their first course of action to find the contact number for ESB, increasing to 88% as any one of their first three actions.⁵¹ Between 1% and 7% of respondents would seek the number from where the

⁵⁰ RED C Utility Non-Geographic Number Survey Results Slide 30 (n = 1307). 19% would ring an electrician and 16% would ring their electricity provider. 4% would ring the emergency services and 7% would check online for who is best to contact.

⁵¹ RED C Utility Non-Geographic Number Survey Results Slide 31 (n = 904). This illustrates that people are aware that there are multiple different options beyond their first response.

legacy number may persist.⁵²

- iii. In terms of the action a person would take if they could not get through to the utility (e.g., if using a legacy number), 36% would look for an alternative number for the relevant utility⁵³ and 14% would call a different emergency service (e.g., 999) if they could not get through to the utility on a particular contact number. Only 4% (within margin of error) would continue dialling the same number.⁵⁴

3.42 In the qualitative research, there was a strong preference to speak to a person to report an incident. Leaving the incident unreported was not seen as an option. Like gas incidents, respondents would not re-dial more than once, and if they could not get through to the utility, people would either ring 999 or google to find an alternative number for the utility. Where time was of the essence, they would quickly call 999. Other key points include:

- Some would turn off the electric supply into the house – and think about who to call.
- The majority were unlikely to have a sticker or emergency number located on a fuse box that they check when looking for an emergency number.
- If the incident was assumed to be caused by supply into the house, there was a preference amongst most attendees to call an electrician, rather than ESN.
- Strong reliance on an online search to find utility number – likely to use a search term such as 'ESB emergency'.

You kind of think what goes on inside the walls of my house is my responsibility and I would need to pay an electrician to sort out the problem.

⁵² 1% would find the number on a physical asset. 5% have the number saved on their phone and 7% have number written down at home. However, a proportion of such people would likely already have updated such references to the new Freephone number (Slide 31, n = 904).

⁵³ 73% would use the internet to look for an alternative number, 16% would consult a bill and 8% would look on a meter or other physical asset within their home. RED C Utility Non-Geographic Number Survey Results Slide 33 (n = 246)

⁵⁴ RED C Utility Non-Geographic Number Survey Results Slide 32 (n = 1307)

Conclusion: Electricity incidents inside the home

- 3.43 ComReg notes that the likely behaviours in relation to electricity incidents in the home are very similar to behaviours relating to a gas incident inside the home. People have a high sense of urgency associated with reporting incidents inside the home and the overwhelming majority would search for the number in areas where the new Freephone number should now be found (e.g., online/printed on a utility bill) or would contact the emergency service where the potential emergency could be reported (e.g., 999). For the small number of those that would use sources where the legacy number may be evident, there are alternatives that such people are willing and able to use.
- 3.44 Furthermore, in the event of a member of the public not being connected to a utility to report an issue, the sense of urgency is such that the vast majority would find the appropriate number through alternative means. The qualitative research (where people were asked to consider certain scenarios) found no evidence of people abandoning the reporting of an emergency in the event they experienced difficulties contacting the relevant utility. Understandably, respondents avoid approaching physical assets, although some felt more comfortable turning off the electricity supply than turning off gas.
- 3.45 Therefore, ComReg is of the preliminary view that people have many options to report potential electricity emergencies in the home and would be highly likely to do so even where a legacy number, such as a Utility NGN, was used in the first instance.

Electricity incidents outside the home

- 3.46 Reporting an electricity incident was viewed as very important, especially outside the home. There was a strong sense of civic responsibility to report an electricity related incident and to protect other members of the public. From the quantitative research:
- i. As a first response, 69% of respondents would ring the ESB emergency line. The remaining first responses all involve situations where the potential emergency would be reported or the Freephone number would be found (e.g., 15% would ring 999/112, 6% would go online to search for who best to contact and 7% would ring their local authority).⁵⁵
 - ii. 64% of respondents would check online first as a means of locating the ESBN emergency number, increasing to 88% as any one of their first three actions.⁵⁶ Between 3% and 11% of people get the number where the legacy number

⁵⁵ RED C Utility Non-Geographic Number Survey Results Slide 37 (n = 1307)

⁵⁶ RED C Utility Non-Geographic Number Survey Results Slide 38 (n = 1127)

may persist.⁵⁷

- iii. In terms of the action a respondent would take if unable to get through to the utility (e.g., if using a legacy number), 27% would look for an alternative number for the relevant utility and 36% would call a different emergency service (e.g., 999) or agency, if they could not get through to the utility on a particular contact number.⁵⁸ Only 4% would persist in calling the same number - this was explored further in the qualitative research where specific scenarios were presented.

3.47 In the qualitative research, there was a high degree of awareness of ESNB as the organisation to report an incident to, but the number to call was generally not known. Where a number needs to be found it is most likely found via an online search. Some participants indicated they would call 999, more common for out of home incidents, to escalate the emergency and ensure a resolution is found. Other key findings:

- An electricity incident outside the home is regarded as a very serious situation. Some would call ESNB first, while others would call 999.
- If the number for the utility is not answered, people would call 999 or the local Garda Síochána station to report the incident.
- Several cited remaining 'on the scene' until a resolution was found, or the relevant services arrived.
- Electricity incidents are treated with caution. A high degree of hesitation was justifiably reported in terms of approaching any electrical asset (especially outside of the home) to establish what number to call, due to personal safety concerns.

I would see it as my responsibility to alert the incident to the authorities and ensure other members of the public are safe until the situation is made safe.

⁵⁷ Just 3% of people get the number from a physical asset. Separately, around 5% have the number written down at home, and another 6% have the number saved on their phone (Slide 38, n= 1127). However, a large proportion of such people would likely have already updated such references to reflect the new Freephone number.

⁵⁸ RED C Utility Non-Geographic Number Survey Results Slide 39 (n = 1307)

Conclusion on electricity incidents outside the home

- 3.48 ComReg notes that respondents treat electricity incidents outside the home very seriously and are very wary about approaching physical assets. Respondents have a high sense of urgency associated with reporting such incidents and the overwhelming majority of people would search for the number in locations where the new Freephone number would be found (e.g., online/utility bill) or would call 999/112.
- 3.49 Searching online was by far the most likely source for finding the ESNB emergency number. People treat a very tangible emergency (e.g., fallen poles or loose wires) with understandable caution and avoid approaching assets. There is also little hesitation to use 999 in such instances. For the small number of those that would use sources where the legacy number may persist, there are alternatives that such people would use.
- 3.50 Therefore, ComReg is of the preliminary view that people have many options to report potential electricity emergencies outside the home to and would be highly likely to do so even where a legacy number (e.g., a legacy Utility NGN) was used in the first instance.

Water

Water incident in the home

- 3.51 Respondents were more likely to report an incident if it involved gas or electricity rather than a water incident, with many considering a water incident to be '*less of an emergency*' or '*less of a threat to life*'. This is reflected in the fact that respondents to the survey were significantly more likely to call their plumber rather than Irish Water for water incidents in the home. From the quantitative research:
- i. As a first response, 46% of respondents would ring their plumber. The remaining responses all involve situations where the potential incident would be reported or the Freephone number would be found (e.g., 19% would ring Irish Water and 10% would ring their local authority).⁵⁹
 - ii. 81% of respondents would check online first as a means of locating the Irish Water priority number, increasing to 93% as any one of their first three actions (figures which are both notably higher than for GNI or ESNB).⁶⁰ Between 1% and 5% of people would seek the number from where the legacy number may

⁵⁹ RED C Utility Non-Geographic Number Survey Results Slide 44 (n = 1307)

⁶⁰ RED C Utility Non-Geographic Number Survey Results Slide 45 (n = 544)

persist.⁶¹

- iii. In terms of the action a person would take if they could not get through to the utility (e.g., if using a legacy number), 32% would look for an alternative number for the relevant utility, 13% would call a different emergency service or agency, and 13% would ring a family member or friend for advice if they could not get through.⁶² Only 4% would call the same number again.

3.52 The qualitative research reinforced the finding that people did not view a water incident in the home as seriously as a gas or electricity incident (i.e., it was not generally perceived as life threatening). Other key findings include:

- Within the home many assume they would be responsible themselves for a water incident, not Irish Water. Some will shut off the water supply and/or call their plumber.
- Online was the main means of checking how to report/find the appropriate number to call. Very few reported reliance on any printed material for Irish Water.



You don't want to experience a water leak in home but if I had to pick between it and gas and electricity, I would pick water.

Conclusion on water incidents inside the home

3.53 People clearly treat water incidents in the home differently to gas and electricity incidents. There is a high occurrence of contacting their plumber rather than reporting it to Irish Water. People would search for the Irish Water number in locations where the new Freephone number would be found (e.g., online).⁶³ Finding the number online was by far the most likely source. People are less likely to report a water incident to the emergency services. Overall, anyone who initially finds and dials the legacy number would appear to have little difficulty in subsequently locating the correct Freephone number and reporting the incident using that number.

3.54 Therefore, ComReg is of the preliminary view that people have many options by which to report potential water incidents in the home and would be likely to do so

⁶¹ 1% would find the number on a physical asset. 3% have the number saved on their phone and 5% have number written down at home (Slide 45, n = 544). However, a proportion of these would likely update such references to the new Freephone number.

⁶² RED C Utility Non-Geographic Number Survey Results Slide 46 (n = 1307)

⁶³ RED C Utility Non-Geographic Number Survey Results Slide 47 (n = 437)

even where a legacy number (e.g., a legacy Utility NGN) was used in the first instance.

Water incident outside the home

3.55 Respondents were more likely to report the incident to Irish Water if the incident occurred outside the home or on the street (in comparison to in home). There was also a high prevalence of seeking to report such incidents to the local authority (e.g., County Council). From the quantitative research:

- i. As a first response, 45% of respondents would report to Irish Water. The remaining responses all involve situations where the potential incident would be reported or the Freephone number would be found (e.g., 31% would ring the local authority and 10% would check using an online search).⁶⁴
- ii. 81% of respondents would check online first, as a means of locating the Irish Water priority number, increasing to 92% as any one of their first three actions.⁶⁵ Between 2% and 4% of people get the number where the legacy number may persist.⁶⁶
- iii. In terms of the action a person would take if they could not get through to the utility (e.g., if using a legacy number), 29% would look for an alternative number for the relevant utility⁶⁷ and 26% would ring a different emergency service (e.g., 112/999) or agency as an alternative.⁶⁸ Only 4% would continue to call the same number.

3.56 The qualitative research reinforced the finding that people did not view a water incident in the home as seriously as a gas or electricity incident. Other key findings include:

- Online search was the main source used to find relevant contact numbers.
- There were lower levels of call persistence compared to gas and electricity - if it was difficult to get in contact with Irish Water or the local council, some may give up and leave the incident unreported or rely on someone else reporting the incident. A water incident outside the home was the least likely scenario to be reported. Where a water incident outside the home is reported,

⁶⁴ RED C Utility Non-Geographic Number Survey Results Slide 51 (n = 1307)

⁶⁵ RED C Utility Non-Geographic Number Survey Results Slide 52 (n = 930)

⁶⁶ 2% would find the number on a physical asset. 4% have the number saved on their phone and 3% have number written down at home (Slide 52, n = 930). However, a proportion of these would likely have already updated such references to the new Freephone number.

⁶⁷ 88% of which would use the internet, 4% would consult a bill and 4% would look on a meter or other physical asset (RED C Utility Non-Geographic Number Survey Results Slide 53, n = 397).

⁶⁸ RED C Utility Non-Geographic Number Survey Results Slide 53 (n = 1307)

members of the public are most likely to call Irish Water or the local council. This is not seen as a life-threatening event and would not to be handled with the same sense of urgency as a gas or electricity emergency. The awareness of relevant contact numbers was lower for water than gas and electricity.

- Some people indicated that they would be satisfied with reporting a water incident outside the home by alternative means (e.g., webchat).

I would be happy to log an incident on a live chat function if it's not really important to report in the first instance and there were issues getting through on the phone.

Conclusion on water incidents outside the home

- 3.57 Water incidents outside the home may go unreported as people may assume somebody else would report them. People would mainly search for the number to call in locations where the new Freephone number would be found (e.g., online) or would dial 999. Finding the number online was by far the most likely source. There was a higher prevalence of reporting to the local authority for water incidents than for gas and electricity.
- 3.58 Therefore, ComReg is of the preliminary view that people have many options to report potential water incidents outside the home and would be likely to do so even where a legacy number (e.g., a legacy Utility NGN) was used in the first instance.

3.4 ComReg's overall assessment

- 3.59 Prior to ComReg's NGN decision in 2018, and strange as it might now seem, the utility providers were using phone numbers that resulted in a charge to people to report potential emergencies/incidents. This created an obvious risk that people would either not make such calls (due to unwillingness to incur cost) or be unable to, due to insufficient or no credit (with pre-pay customers accounting for around 60% of mobile subscriptions at that time). Furthermore, the NGN platform was subject to widespread confusion about the call charges applying to each number range, which affected peoples' understanding of the retail prices for calls to NGNs. Such problems undoubtedly reduced the volume of calls made to organisations using NGNs (including to utility operators). It is against this background that emergency calls to the utilities were made in Ireland.
- 3.60 In ComReg Document 21/75, ComReg considered it prudent to provide utility operators with additional time to manage the switch to new numbers and allow for

evidence to be gathered to assess the level of residual risk. On the basis of the evidence and analysis set out in Chapters 2 and 3 above, it is clear that the circumstances following November 2023 (switch off having gone ahead, as planned) are significantly improved upon in comparison with the situation that persisted prior to 2018, and the general public therefore would likely be less inhibited in making calls to report potential emergencies.

3.61 This view is based on the fact that each of the utilities now provide an 1800 Freephone NGN⁶⁹, so the risk of callers being unable to report potential emergencies due to being charged or having no or insufficient credit has been removed arising from ComReg's NGN Decision. In particular:

- ComReg's NGN Consolidation measure withdrew the 1850 and 1890 NGNs and incentivised organisations (including utility operators) to migrate to an alternative number of their choosing (in the case of the utility operators this was Freephone 1800).
- In 2020, ComReg implemented a wholesale price control mechanism on NGN call origination charges that substantially reduced the charges faced by organisations (including utility operators) providing a Freephone 1800 number.⁷⁰
- ComReg's NGN Pricing and Consolidation Decisions reduced confusion as to what each NGN range offers in terms of its features and pricing - decreasing the likelihood of people not making calls to organisations that use these numbers.
- ComReg's assessment of the call volume figures shows that across the board (for all three utilities), the total volume of calls to the emergency/priority lines have increased, indicating greater ease of use of the 1800 versus 1850 and 1890 numbers

3.62 Regardless of the preceding counterfactual, the review conducted by ComReg demonstrates that the overall risk⁷¹ of a potential emergency going unreported due to the dialling of a legacy Utility NGN to be very low. Significant migration has already occurred from the legacy Utility NGNs to the 1800 Freephone numbers and less than

⁶⁹ ComReg notes that of all the numbers, in the survey conducted in 2017, Freephone 1800 had the highest levels of trust, a situation that has likely been strengthened arising from the 2018 NGN Decision, encompassing the Geolinking condition and NGN Consolidation.

⁷⁰ [ComReg 20/04R](#) and D02/20: Access to Non-Geographic Numbers: Imposition of price control and transparency obligations

⁷¹ It should be noted that the risk is not that a member of the public fails to report a potential incident because that person dials a legacy Utility NGN to report it. Rather, the risk is that a 'safety of life' incident occurs in practice that would have been reported by someone, but that person failed to report the incident because they dialled a legacy Utility NGN and subsequently did not follow up when they were unable to get through to the relevant utility.

[REDACTED] calls a month are made to the GNI and Irish Water legacy Utility NGNs. Indeed, calls to the main legacy GNI NGN and Irish Water NGN have declined by 83% and 94% respectively. Calls to the legacy Utility NGN for ESBN have declined by 73%, although remain somewhat elevated at [REDACTED] per month. However, each of the previous two years have shown a drop of [REDACTED] calls per annum - indicating that further declines are likely before the end of the year (i.e., by the NGN Extension Deadline).

- 3.63 Call volumes to the legacy Utility NGNs will continue to decline but there will likely remain a residual number of calls made to the numbers after November 2023. However, the detailed research commissioned by ComReg shows that an overwhelming number of people find the relevant utility number from sources where the new number would be found (e.g., online, printed on utility bills etc). Utility operators should have updated their emergency/priority numbers online, and on utility bills, and members of the public should therefore be able to find the 1800 Freephone numbers when they look online or consult a bill. Indeed, ComReg observes that each of the utilities have informed ComReg that they now (and for some time) only publish the new 1800 Freephone numbers online, on utility bills and on other physical materials provided to consumers.
- 3.64 Given the prevalence of 'online search' as the means of finding a contact number for the utilities (in the quantitative and qualitative results), ComReg carried out a desk-based exercise to confirm that the phone numbers found via an online search were in fact the new 1800 Freephone numbers. Based on likely search terms, and the feedback of focus group attendees on what they would type into Google when searching for a number, a wide range of searches were conducted.⁷² The desk-research found that the replacement 1800 Freephone numbers were consistently the top results and there is therefore a very high likelihood that these will be found when different search phrases are entered by members of the public.
- 3.65 Other alternatives (e.g., ringing an electrician, gas supplier or local authority) would all likely result in a person receiving the correct replacement 1800 Freephone number or being connected to same. Furthermore, a consistent feature across all utilities and scenarios was the use of 999/112 in the event of an emergency. It is therefore highly unlikely that someone who wished to report a potential emergency (i.e., one where there was a clear risk to safety of life) would not dial 999/112 having failed to get through to a legacy Utility NGN.
- 3.66 There is a marginal cohort that would (in the first instance) locate the number from a source where the old legacy Utility NGN may remain (e.g., a boiler/meter located

⁷² Search terms included but were not limited to; 'gas emergency number', 'fallen electricity wires', 'water emergency', 'smell of gas on street', 'GNI emergency number' and 'ESB emergency number'.

within their home). However, these respondents demonstrated a willingness to use other methods (either in parallel or as a follow up) to obtain the number in the event they needed to.⁷³ Again, these respondents used other alternatives (e.g., online/utility bill) as one of their first three steps in locating a number (i.e., after using a number located on a physical asset, they would use a number found online or on a bill etc.) – this approach would result in the person finding the correct 1800 Freephone number to use. There is a high-level of persistence in reporting potential emergencies/incidents across all demographics.

3.67 The three locations where such marginal members of the public are at risk of locating a legacy Utility NGN in the first instance are:

- On a physical asset (e.g., a meter/boiler located in the home, or cabinets, boxes and poles outside the home), notwithstanding the understandable reluctance to approach such assets in an emergency situation;
- On their phone if the number is pre-saved (mobile or landline); and
- Written down at home (e.g., on a note fixed to a pinboard or fridge).

3.68 However, there are also measures the utility operators can take (and should have already taken in the four years that have already passed) to reduce the risks of legacy Utility NGNs remaining in such locations. The research shows that people update contact information if they receive new communication/material from a utility (i.e., if there was a renewed education campaign around the replacement numbers) and there is some evidence of this having occurred already.⁷⁴ This finding was bolstered during the focus groups, as amongst those who reported having the utility emergency number written down/saved in their phone, when prompted to check what number they had on record, they confirmed that it was the 1800 version in all cases.

3.69 In relation to meters and boilers (i.e., physical assets inside the home), utility operators can also communicate with consumers about the replacement numbers. Indeed, utility operators have already undertaken such measures. [REDACTED]

[REDACTED] ⁷⁵ ESNB has been promoting the 1800 Freephone replacement

⁷³ For example, the survey results shows that the majority (64 – 81%, depending on the incident) of people will go online first to look for a utility number. This share increases further amongst those who would check online as any one of their first three steps, to 82 – 93%.

⁷⁴ This was discussed in the face-to-face focus group (over 75s), where participants indicated that if and when they receive communications (e.g., leaflets, flyers, letters) from utility providers and operators through the post (e.g., as part of an educational/information campaign), they keep these documents for future reference and update any records they keep (e.g., written notes, saved numbers on their phone etc.)

⁷⁵ [REDACTED]

number through its customer care channels. Utility operators should continue to engage with customers and inform them to update the emergency/priority contact numbers where they are either stored or written down.

- 3.70 [REDACTED] [REDACTED] ESBN ⁷⁶ indicated that it does not intend to replace the legacy number on poles/pylons, and that such assets will not display any contact number in the future – to discourage members of the public from approaching them. Whilst the existence of the legacy utility NGNs on some physical assets is a matter for the relevant utility operator(s), this cannot warrant the further maintenance of legacy Utility NGNs. In any event, ComReg notes that there was a distinct reluctance amongst focus group participants to approach a physical asset in search of a number (particularly outside the home). This justifiable reluctance to approach assets markedly reduces the likelihood of a person dialling the legacy Utility NGN when attempting to report an incident. In another focus group finding, several respondents noted that even if they were to approach an asset and observe a number to call, they would still use an online search to identify the correct number as they would assume the number on the asset was outdated.
- 3.71 Given the existence of outdated signage on assets, there is likely to remain a small proportion of the public who might dial the legacy Utility NGNs, and this is unlikely to reach zero by November 2023 (or indeed a later date). However, based on the evidence presented, ComReg considers the risk of potential incidents going unreported due to the initial dialling of a legacy Utility NGN to be very low. Respondents noted that they would not waste time re-dialling a number that doesn't get through. Many reported their next course of action being to call 999/112 or to google the number to check they had the correct one or find an alternative number.
- 3.72 ComReg notes that the current situation where utility operators have both legacy Utility NGNs and the replacement 1800 Freephone numbers operating concurrently is neither efficient or sustainable, as it imposes costs on telecom operators⁷⁷ and undermines the NGN Consolidation Decision, which will have been published nearly five years previously by the end of 2023. A situation where people are using legacy Utility NGNs creates confusion about the NGN ranges that are currently operational. Further, the six legacy Utility NGNs are not 1800 Freephone numbers and therefore

⁷⁶ ESBN noted that the biggest and more onerous task in this regard was the ESB street cabinets- the maintenance cycle for which is typically four years. ComReg notes that this is less than the almost five years that will have been provided by November 2023.

⁷⁷ For example, in response to ComReg Document 21/28, Vodafone observed that the preservation of a small quantity of NGN numbers will **add complexity and considerable cost**, and that **maintaining these numbers going forward will also have a cost as they will need to be tested separately during future network changes**. Vodafone accepts the rationale for their temporary extension but suggests that ComReg works with all parties to have them removed in as short a time as possible. [Emphasis added]

remain exposed to the risk of certain cohorts being frustrated in their ability to report potential incidents (e.g., if they have no or insufficient phone credit) or being unwilling to report (due to perception of cost).

- 3.73 Overall, the analysis of the likely behavioural responses shows that incidents or emergencies – particularly those which are more serious or deemed a greater threat to life or safety would be reported. There is never any guarantee that ‘safety of life’ incidents would not go unreported and utility operators will have to consider relevant safety requirements in their own case and determine whether additional investment needs to be made. However, the situation after November 2023 remains a significant improvement on what persisted before 2018, and members of the public are highly likely to locate the correct 1800 number to call even if they use the legacy Utility NGN in the first instance.
- 3.74 ComReg’s NGN work and consolidation commenced in 2017 and each of the utilities has been aware of the need to migrate to 1800 Freephone NGNs, with time to advertise and update their numbers on assets etc. for almost five years. In this time (as reflected by the migration in call volumes towards the 1800 Freephone numbers), significant progress has been made but further work needs to be done in the months ahead. Each of the utilities (and ESN in particular) should continue to engage with consumers and relevant businesses and promote their new 1800 Freephone NGNs – as signalled by ComReg in ongoing engagements with those utilities.
- 3.75 **Therefore, ComReg is of the preliminary view that for each of the six Utility NGNs, it is appropriate to proceed as planned and switch off the Legacy Utility NGNs at the end of November 2023, with no further extension granted to the operation of these numbers.**

3.5 Summary of Conclusions

- 3.76 ComReg has reached this preliminary view based on the evidence and assessment outlined above, namely:
- (a) Relatively low remaining volumes of calls being made to the legacy Utility NGNs in comparison to the replacement 1800 Freephone NGNs – across all three utilities.
 - (b) Evidence on the likely behavioural response of the public in the event of a situation which requires reporting, i.e., that the vast majority would use an online search to identify the number to report the incident (where they would find the replacement 1800 number) or dial 999/112 – both of which would result in the incident being reported.
 - (c) Evidence on the likely behavioural response after dialling a legacy Utility NGN, which shows that people would not continue to redial, but rather would

then use an online search engine to identify the number (which would result in them sourcing the correct 1800 number) or call 999/112.

- (d) The need to eliminate confusion on NGNs once and for all.
- (e) It is both inefficient and sub-optimal to keep whole number ranges open for a small number of NGNs.
- (f) Utilities will have had five years to migrate from 1850 and 1890 numbers since the original NGN Decision was made (December 2018 to end November 2023).

Q.1. Do you agree with ComReg's assessment of the Utility NGNs and the proposal to proceed as planned with the cessation of the Utility NGNs from 30 November 2023? Please explain the basis for your response in full and provide supporting information.

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4 Recommendations and next steps

4.1 Recommendations and next steps for phasing out the Utility NGNs

4.1 ComReg recommends the following actions for the utilities for the coming months in terms of phasing out the Utility NGNs:

- Arrange with their terminating operator(s) to put in-call announcements on the legacy Utility NGNs now, to indicate the new 1800 Freephone numbers to call for the services. In this way callers can learn and start using the new numbers before the numbers are switched off at the end of November 2023.
- Advertise and communicate the replacement 1800 Freephone numbers as widely as possible immediately. ComReg's research reveals that 83% of people check online when looking for business phone numbers.⁷⁸ Updating websites and online business contact details is therefore a priority. Other assets and materials (e.g., vehicles, leaflets, and brochures), especially those that are widely visible (e.g., vans), should also be updated. Third party communications materials (e.g., Directory Enquiries and Golden Pages) should also be checked and updated. Direct marketing campaigns could be run to target certain cohorts if required (e.g., newspaper or radio ads). For reference, ComReg has published a useful checklist for organisations on updating communications materials.⁷⁹
- Consider switching off the legacy Utility NGNs in advance of 30 November 2023 (e.g., by end August 2023) so that any issues may be fully addressed before the numbers are switched off fully by all telecoms operators at the end of November 2023.

Q.2. Do you agree with ComReg's recommendations and next steps for phasing out the Utility NGNs? Please explain the basis for your response in full and provide supporting information.

⁷⁸ [ComReg 18/90a](#): Market Research - Consumer behaviour regarding finding phone numbers

⁷⁹ See <https://www.comreg.ie/media/2021/09/Comms-Checklist-COMREG-Service-Provider-210921.pdf>

5 Consultation Questions

Q.1. Do you agree with ComReg's assessment of the Utility NGNs and the proposal to proceed as planned with the cessation of the Utility NGNs from 30 November 2023? Please explain the basis for your response in full and provide supporting information.

Q.2. Do you agree with ComReg's recommendations and next steps for phasing out the Utility NGNs? Please explain the basis for your response in full and provide supporting information.

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Responding to the Consultation

ComReg invites and welcomes the views of all interested parties and will consider all information submitted to it on foot of this consultation. Upon completion of this consultation, which will include a review of all responses received, ComReg will publish its Response to Consultation.

Submitting comments

The consultation period will run for four weeks, as per ComReg's Consultation Procedures (ComReg 11/34). The period for submitting responses to this consultation will run until 5pm on Wednesday 19 April 2023.

ComReg requests that all responses reference the relevant question numbers and/or paragraph numbers from this document. ComReg also requests that respondents set out the rationale for their submitted views and include any supporting information.

ComReg will publish all responses to this consultation in due course in accordance with its policy. Respondents are therefore asked to provide confidential and non-confidential versions of any document in respect of which any confidentiality is claimed (e.g., commercially sensitive information). In this respect, please see ComReg's Consultation Procedures (ComReg 11/34) and Guidelines on the Treatment of Confidential Information (ComReg 05/24).

ComReg requests that responses to this consultation be submitted electronically and in an unprotected format in order that they can be appended into ComReg's submissions document for electronic publication.

All responses to this consultation should be clearly marked: "Reference: Consultation 23/27 "Review of Utility Non-Geographic Numbers Extension", and sent by e-mail to arrive on or before 5pm, on 19 April 2023, to:

Karen Dunne
Commission for Communications Regulation
Email: marketframeworkconsult@comreg.ie

Annex 1: For Information Only - Other Extended NGNs

A 1.1 Close to the NGN Consolidation deadline (31 December 2021), ComReg became aware of other 1850 and 1890 NGNs that would not be migrated to new numbers in time. These NGNs were in use by the Health Service Executive (HSE), Irish Rail and Tunstall Emergency Response (see Table 6).

Organisation	Legacy NGN
Health Service Executive (HSE)	1850 777911
	1850 224477
	1850 302702
	1850 400911
	1890 100016
	1850 211869
	1890 499299
	1890 252919
	1890 252920
	1890 252929
	1850 444925
	1850 241850
	1850 636313
	1850 420420
1890 424555	
1850 200776	
Irish Rail	1850 226226
	1850 757575
	1890 544611
	1890 737372
	1890 737371
	1890 737373
	1890 737374
	1890 737375
1890 737376	
1890 737377	
Tunstall Emergency Response	1850 804141

Table 6: Legacy NGNs in use by HSE, Irish Rail and Tunstall Emergency Response

A 1.2 To provide additional time to migrate to and communicate replacement numbers,

ComReg permitted the NGNs in Table 6 to remain in operation until 30 November 2023. ComReg indicated, in September 2021, that the legacy HSE NGNs would not be extended for more than two years.⁸⁰

A 1.3 ComReg recently met with each of these NGN users and urged them to prioritise switching to and communicating the replacement numbers that are now in operation for the relevant services.

A 1.4 For the avoidance of doubt, no further extension will be considered for the legacy NGNs in Table 6 and in use by HSE, Irish Rail or Tunstall Emergency Response. These numbers will cease to operate from midnight on 30 November 2023. There will be no call announcements on the numbers after 30 November 2023, and callers will then hear a Number Unobtainable tone.

A 1.5 The HSE, Irish Rail and Tunstall Emergency Response are advised to:

- Arrange with their terminating operator(s) to put in-call announcements on the legacy NGNs now, to indicate the new numbers to call for the services. In this way callers can learn and start using the new numbers before the legacy numbers are switched off at the end of November 2023.
- Advertise and communicate the replacement numbers as widely as possible immediately. ComReg's research reveals that 83% of people check online when looking for business phone numbers.⁸¹ Updating websites and online business contact details is therefore a priority. Other assets and materials (e.g., vehicles, leaflets and brochures) especially those that are widely visible (e.g., vans), should also be updated. Third party communications materials should also be checked and updated. For reference, ComReg has published a useful checklist for organisations on updating communications materials.⁸²
- Consider switching off the legacy NGNs in advance of 30 November 2023 (e.g., by end August 2023) so that any issues that arise may be fully addressed before the numbers are switched off fully by telecoms operators at the end of November 2023.

⁸⁰ [ComReg 21/89](#): Review of Extended Operation of Health Service Executive 1850/1890 Non-Geographic Numbers Response to Consultation 21/75 and Decision

⁸¹ [ComReg 18/90a](#): Market Research - Consumer behaviour regarding finding phone numbers

⁸² See <https://www.comreg.ie/media/2021/09/Comms-Checklist-COMREG-Service-Provider-210921.pdf>

Annex 2: Call Volumes

A 2.1 In this Annex ComReg provides further details of the call volume data supplied by the terminating operator(s) for the Utility NGNs.

GNI

A 2.2 Between January 2021 and January 2023, the number of calls on the 1800 NGN [REDACTED], and the proportion of total emergency calls attributable to the 1800 number increased from 1% to 90%. On average, since August 2022, [REDACTED] of calls are being made to the 1850 Utility NGN. Overall, the volume of 1800 Freephone calls have climbed continually since January 2021, whereas the 1850 calls are in precipitous and consistent decline, as shown in Figure 5 below.

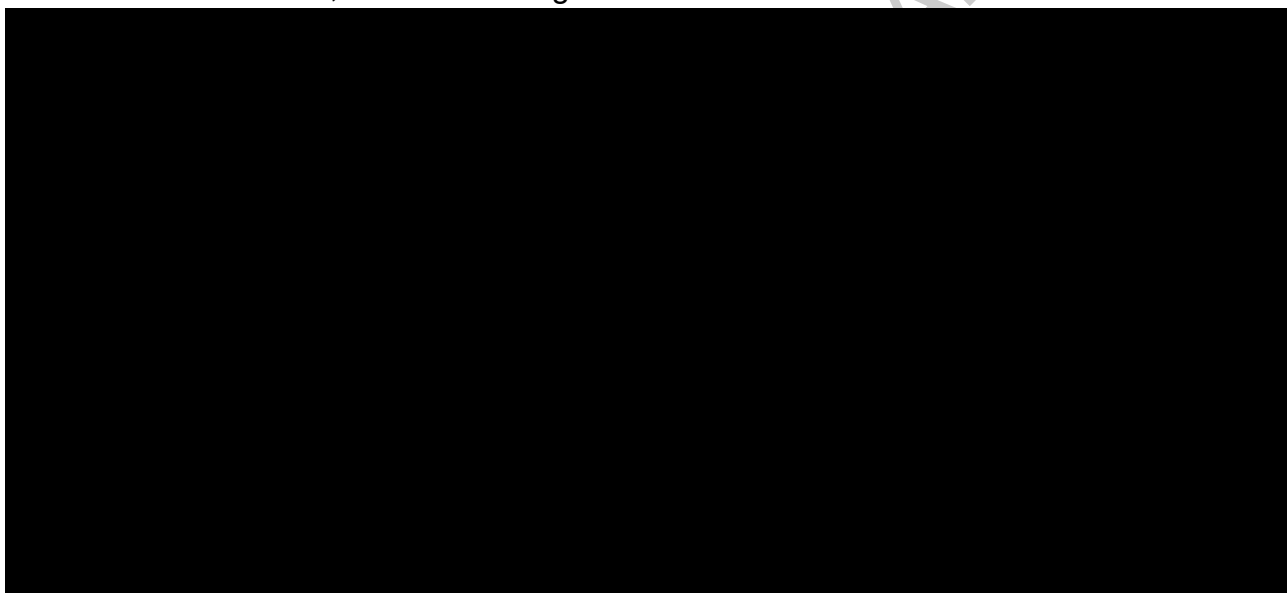


Figure 5: Call Volumes to Gas Networks Ireland's main emergency NGNs (January 2021 – January 2023) [REDACTED]

Source: Call Volume Data from Terminating Operator

Month	Number of Calls			Share	
	1800205050	1850205050	Total	1800205050	1850205050
Jan 2021	[REDACTED]	[REDACTED]	[REDACTED]	1%	99%
Jan 2022	[REDACTED]	[REDACTED]	[REDACTED]	72%	28%
Jan 2023	[REDACTED]	[REDACTED]	[REDACTED]	90%	10%
Net Change ⁸³	[REDACTED]	[REDACTED]	[REDACTED]		

Table 7: Share of calls to GNI Emergency NGNs (January 2021, 2022, and 2023)
 [REDACTED]

Source: Call Volume Data from Terminating Operator

Month	Number of Calls						Share			
	DBYD			SCADA			DBYD		SCADA	
	1800427427	1850427427	Total	1800211615	1850211615	Total	1800427427	1850427427	1800211615	1850211615
Jan-21	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	10%	90%	100%	0%
Jan-22	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	49%	51%	100%	0%
Jan-23	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	74%	26%	100%	0%
Net Change	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]				

Table 8: Share of calls to other GNI Utility NGNs (January 2021, 2022, and 2023)
 [REDACTED]

Source: Call Volume Data from Terminating Operator

ESBN

A 2.3 Between January 2021 and January 2023, the number of calls on the 1850 NGN [REDACTED], and the proportion of total emergency calls attributable to the 1850 NGN fell from 86% to 14% (See Table 9 below) . Over the same time period, the number of calls on the 1800 NGN [REDACTED], and the proportion of total emergency calls attributable to the 1800 NGN increased from 32% to 86%.

⁸³ Between January 2021 and January 2023

Figure 6: Call Volumes to ESBN's emergency NGNs (January 2021 – January 2023) [REDACTED]

Source: Call Volume Data from Terminating Operator

Month	Number of Calls			Share	
	1800372999	1850372999	Total	1800372999	1850372999
Jan 2021	[REDACTED]	[REDACTED]	[REDACTED]	32%	68%
Jan 2022	[REDACTED]	[REDACTED]	[REDACTED]	69%	31%
Jan 2023	[REDACTED]	[REDACTED]	[REDACTED]	86%	14%
Net Change	[REDACTED]	[REDACTED]	[REDACTED]		

Table 9: Share of Calls to ESBN emergency NGNs (January 2021, 2022, and 2023) [PARTIALLY REDACTED]

Source: Call Volume Data from Terminating Operator

Irish Water

A 2.4 Between January 2021 and January 2023, the number of calls on the 1850 Irish Water NGN [REDACTED], and the proportion of total calls attributable to the 1850 NGN fell from 92% to 3%. The number of calls on the 1890 NGN [REDACTED], and the proportion of total calls made to the 1890 number fell from 7% to 2% (see Table 10). Over the same period the number of calls to the 1800 NGN [REDACTED], and the proportion of total emergency calls attributable to the 1800 NGN increased from 0% to 95%.

A 2.5 Overall, calls to the 1800 NGN now make up 95%, whereas those to the 1850 and 1890 NGNs make up just 3% and 2% respectively. Since August 2022 an average

of [REDACTED] monthly calls are made to the 1850 NGN and an average of [REDACTED] monthly calls are made to the 1890 NGN (see Table 10).

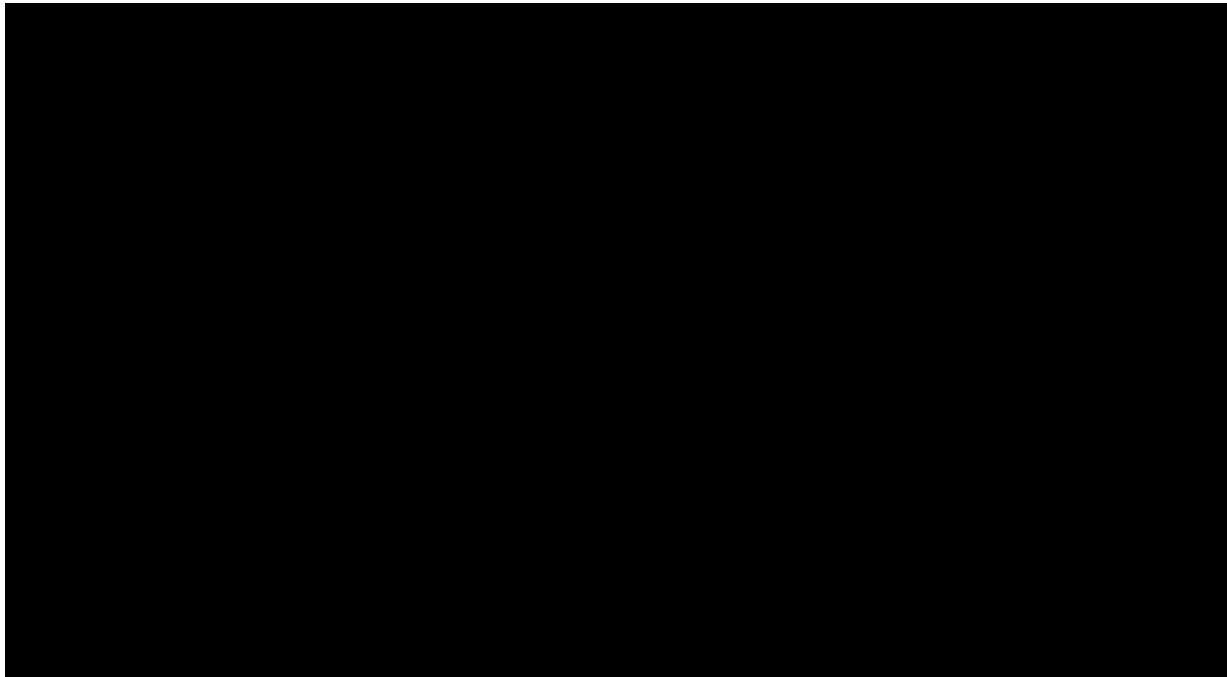


Figure 7: Call Volumes to Irish Water’s priority contact numbers (January 2021 – January 2023) [REDACTED]

Source: Call Volume Data from Terminating Operator

Month	Number of Calls				Share		
	1800278278	1850278278	1890278278	Total	1800278278	1850278278	1890278278
Jan 2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	0%	92%	7%
Jan 2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	85%	11%	5%
Jan 2023	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	95%	3%	2%
Net Change	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]			

Table 10: Share of Calls to Irish Water’s priority NGNs (January 2021, 2022, and 2023) [PARTIALLY REDACTED]

Source: Call Volume Data from Terminating Operator