



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

# Review of Non-Geographic Numbers

## Non-Confidential Submissions to Consultation 23/27

Non-Confidential

### Submissions to Consultation

**Reference:** ComReg 23/68s

**Version:** Final

**Date:** 21/07/2023

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

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## Submissions Received from Respondents

Document No:	23/68s
Date:	21 July 2023

Consultation:	23/27
Response to Consultation:	23/68

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# 1 Commission for Regulation of Utilities

## **Review of Utility Non-Geographic Numbers Extension, ComReg 23/27 Consultation response**

### **Q.1**

The CRU has a safety regulatory remit and within this we have a role in the promotion and public awareness of energy safety. In our responses to ComReg's previous consultations on this topic, the CRU has drawn attention to potential safety concerns with ceasing the 1850 range for utility providers' emergency phone numbers. The CRU welcomes the decision by ComReg in July 2021 (ComReg Document 21/75), to exceptionally extend the operation of six 1850/1890 emergency contact numbers to 30 November 2023.

With particular reference to Gas Network Ireland's NGNs, a Quantitative Risk Assessment (QRA) is being undertaken by Gas Networks Ireland which will determine the residual risks associated with terminating its NGNs and whether they meet acceptable thresholds. This assessment is not yet complete. The CRU considers the completion of this QRA will facilitate an appropriate review and decision on when these NGNS should cease, based on safety-risk analysis following the ALARP (As Low As Reasonably Practicable) principle.

### **Q.2.**

In relation to considering switching off the legal Utility NGNs in advance of 30 November (e.g., by end August 2023) the CRU considers that the QRA as referenced in our response to Q1 will first facilitate an appropriate review and decision on timing.

## 2 Eir Group

**eir's Response to ComReg Consultation on a Review of Utility Non-Geographic Numbers Extension**

**ComReg Document: ComReg 23/27**



**19 April 2023**

## DOCUMENT CONTROL

<b>Document name</b>	eir response to ComReg Consultation 23/27
<b>Document Owner</b>	eir
<b>Status</b>	Non-Confidential

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

Please note that, for the purposes of the Freedom of Information Act 2014 and the Communications Regulation Act 2002 (as amended) and in the context of the eir Group's general rights and obligations, information supplied by the eir Group to you may contain confidential, commercially sensitive or price sensitive information consisting of financial, commercial, technical or other information, whose disclosure to a third party could result in financial loss to the eir Group, could prejudice the competitive position of the eir Group in the conduct of its business, or could otherwise prejudice the conduct or outcome of contractual or other negotiations to which the eir Group is a party.

Accordingly, you are requested to contact a member of eir Group's Regulatory Strategy Team where there is a request by any party to have access to records which may contain any of the information herein and not to furnish any information before the eir Group has had an opportunity to consider the matter.



Outlined below is eir's response to the questions in Reference: Consultation 23/27 "Review of Utility Non-Geographic Numbers Extension."

## Response to consultation

**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.**

1. eir has no objection to the proposal to proceed as planned with the cessation of the utility NGNs from 30 November 2023.
2. In response to ComReg consultation 21/28, eir stated any further extension of the operation of the utility NGNs should be scrutinised and ComReg must present objective justification if it is proposed to allow an extension. It is clear following ComReg's 2023 review, there is no justification for an extension of the use of the utility NGNs.
3. eir notes that ComReg's review found there is a high-level of persistence in reporting potential emergencies/incidents across all demographics. Also, the overall risk of a potential emergency going unreported due to the dialling of a legacy utility NGN is very low.
4. eir notes that recent call data shows the overwhelming majority of calls have now successfully migrated to the new 1800 Freephone numbers as stated in paragraph 3.12. However, eir does not agree with ComReg's approach to make assumptions about the likelihood of future calls that may be made to legacy utility NGNs after the deadline of 30 November 2023. All decisions should be based on data rather than assumption, even though in this case the assumption has not changed the overall decision.
5. eir agrees with ComReg's statement that continuing to operate legacy numbers has the "potential to generate confusion," and to impose undue network costs on operators to keep legacy numbers unnecessarily operational.

**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.**

6. eir does not agree with ComReg's proposal that utility providers should arrange with their terminating operators to put in-call announcements on the legacy utility NGNs to indicate the new 1800 Freephone numbers. As eir has highlighted previously, eir does not have the facility to enable such announcements, nor is it realistic to run multiple network announcements. eir notes that other legacy NGNs were terminated successfully without the proposed announcements.
7. As stated in paragraph 2.8, eir considers that updating communications on the legacy NGNs is the responsibility of the utility companies. In particular, updating websites and online business contact details as a priority. eir notes that ComReg has published a checklist for organisations on updating communications materials.
8. eir does not object to switching off the legacy utility NGNs in advance of 30 November 2023 to assist with addressing any issues that may arise. However, this process will be led by the utility providers.
9. eir has proactively engaged with utility companies over the last number of years. In February 2023, eir contacted our relevant customers (utility NGNs and the other extended NGNs) highlighting the need for them to ensure all necessary arrangements have been made to meet the 30 November 2023 deadline. However, it is ultimately the responsibility of the utility providers to manage their migration.

## 3 ESB Networks

**From:** Wallace. John (ESB Networks) <[REDACTED]>  
**Sent:** Wednesday 19 April 2023 16:33  
**To:** Market Framework Consult <[REDACTED]>  
**Cc:** Karen Dunne <[REDACTED]>; Rushe. Noel (ESB Networks) <[REDACTED]>;  
Clancy. Dale (ESB Networks) <[REDACTED]>  
**Subject:** FW: [Restricted] ComReg Consultation on Review of Utility NGNs Extension

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

To: [REDACTED]

ESB Networks acknowledges the following documents:

- [ComReg 23/27: Review of Utility Non-Geographic Numbers \(NGNs\) Extension Consultation](#)
- [ComReg 23/27a: Research on Utility Non-Geographic Numbers](#)

ESB Networks intend to comply with the recommendation outlined in section 4.1 of 23/27 Review document.

*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.*

This will shortly be actioned by ESB Networks, and anticipate that this will encourage the adoption of the 1800 variant of or Fault and Emergency Contact number. The latest volume statistics indicate that approximately 15% of callers to the Fault and Emergency number are dialling the 1850 variant.

The field assets with the highest public safety risk are typically mini-pillar assets that are installed in housing estates. These assets have the highest likelihood of contact by members of the public due to their nature. ESB Networks commenced a signage upgrade project in 2020 as part of ongoing routine maintenance. The maintenance programme is a 5 year cycle, unless an expensive accelerated asset update programme is undertaken. ESB Networks are now approximately 50% through this 5 year cycle.

The planned cessation of the 1850 derogation for ESB Networks will present an unacceptable public safety risk since the asset upgrade programme for Mini-pillars will not be concluded until 2025. ESB Networks acknowledges the Red-C research into customer behaviour, but this does not negate the public safety risk associated with the planned cessation of the 1850 derogation in November 2023.

Consequently, ESB Networks request that the derogation is extended by a further 2 years to 31<sup>st</sup> December 2025 to align with the conclusion of this high risk asset upgrade programme.

Kind regards,  
John Wallace  
ESB Networks

**John Wallace | Project Manager, P-LTE | Networks Telecoms, ESB Networks | T:** [REDACTED]  
[REDACTED]

## 4 Gas Networks Ireland

**From:** Owen Wilson <[REDACTED]>  
**Sent:** Wednesday 19 April 2023 16:49  
**To:** Market Framework Consult <[REDACTED]>; Karen Dunne <[REDACTED]>  
**Cc:** Rory Mee <[REDACTED]>; Wayne Mullins <[REDACTED]>  
**Subject:** Reference: Consultation 23/27 "Review of Utility Non-Geographic Numbers Extension"

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

Reference: Consultation 23/27 "Review of Utility Non-Geographic Numbers Extension"

To whom it may concern,

Gas Networks Ireland has considered the above ComReg consultation.

In relation to the 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.***

Gas Networks Ireland supports the eventual cessation of legacy utility NGNs, however Gas Networks Ireland does not agree with ComReg's assessment of the utility NGNs and cannot, at this time, agree with the proposal to proceed as planned with the cessation of the utility NGNs from 30 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***

Gas Networks Ireland supports the eventual cessation of legacy utility NGNs and will do what is reasonably practicable to ensure that users of these services remain able to contact it, however a number of the recommendations will be of little practicable benefit in achieving this.

Gas Networks Ireland has a fuller response to both questions explaining the basis of our response and providing supporting information. This is currently undergoing internal review. We expect to be able to submit this to ComReg next week.

Regards,

Owen

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

[REDACTED]  
Gas Networks Ireland,  
NSC, St. Margaret's Road,  
Finglas, Dublin, D11 Y895



If you receive this email outside of your normal working hours, apologies and please do not feel obliged to respond.

Text in blue and italics is from ComReg consultation document 23/27.

### **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.***

Gas Networks Ireland supports the eventual cessation of legacy utility NGNs, however Gas Networks Ireland does not agree with ComReg’s assessment of the utility NGNs and cannot, at this time, agree with the proposal to proceed as planned with the cessation of the utility NGNs from 30 November 2023.

Taking the points (a) to (f) made in 3.76 of ComReg 23/27 (above), GNI cites the following:

(a) ComReg has used incorrect and non-conservative data in its assessment of call volumes which provides a misleadingly optimistic representation of the balance of calls being received on the new 1800 numbers versus the legacy 1850 numbers. GNI understands that the call termination data utilised by ComReg includes all calls made on 1800 numbers but excludes a proportion of calls made on 1850 numbers where the duration of these calls does not reach a minimum threshold. The data used by ComReg is therefore presenting an false picture of the switch to 1800 numbers.



For example, in January 2023 Gas Networks Ireland received<sup>1</sup> [REDACTED] calls on the new 1800 emergency number and [REDACTED] calls on the legacy 1850 number – 81.1% and 18.9% respectively based on network call data provided by our telecoms provider, eir (see Table 1 below). Table 7 of the ComReg consultation document presents this as 90% and 10% respectively ([REDACTED] and [REDACTED] calls respectively per data received from eir – see Table 2 below). A similar difference between the two data sources is apparent in other months as well.

[REDACTED]

**Table 1 – January 2023 Gas Emergency Service Network Call Data (extracted from eir portal)**

[REDACTED]

**Table 2 – September 2022 to January 2023 GNI NGN Call Termination Data (supplied by eir)**

81.1% is certainly a majority, but it is hardly the “overwhelming majority” cited in the consultation document. There are still a significant number of callers – over [REDACTED],000 per month in January 2023 - using the legacy 1850 emergency number despite Gas Networks Ireland’s continued efforts to promote the new number.

Whilst it might be argued that short calls to the legacy 1850 numbers below a certain minimum duration cannot be of sufficient duration to be a genuine emergency call, the same argument can also be made in relation to short duration calls made to new 1800 numbers. If a proportion of calls to one number are to be excluded from the analysis then they should be excluded from both numbers.

This difference was pointed out to ComReg in GNI’s data submission in October 2022 and despite this, the call-termination data has still been used in place of more accurate, more conservative network call data. There is no discussion or explanation of this difference in the consultation document save that ComReg have consider it the “most complete” data (despite the omission of several hundred calls per month made on the legacy NGN). Whilst there are some gaps in the historic data provided by Gas Networks Ireland for the Gas Emergency number calls there is still sufficient data to determine both the balance of calls being made to both numbers and the overall trend.

The legacy utility NGNs provide an important safety service and are still clearly used by a significant number of callers. Without an assessment or discussion of how the use of the data set used in the consultation document results in a safer outcome than the use of more accurate (and indeed more conservative) data it cannot be concluded that the outcome arrived at is a safe one.

Furthermore, even if the volume of calls to legacy 1850 numbers was not disputed, there is no demonstration that the “relatively low” volume of calls being made to the legacy NGNs (whether it is several hundred or over [REDACTED] thousand as experienced in January 2023) results in a residual risk to public safety that is, in fact, low *enough*. In short, there is no objective quantitative assessment of the risk to public safety arising from the termination of these numbers against any recognised acceptability threshold.

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<sup>1</sup> Answered by the IVR system. A slightly higher number of calls are actually made, but do not reach the IVR system.

- (b) The behavioural response of the public in the event of a situation which requires reporting is best understood by exploring the actual behaviours of existing callers rather than consumer research of a hypothetical situation.

In January 2023, 1.25% calls to GNI’s emergency service were categorised as transfers from the 999/ 112 emergency service. A total of [REDACTED] calls were received directly on the new 1800 emergency number and [REDACTED] calls were received on the legacy 1850 number – 81.1% and 18.9% respectively. Around 19% of callers are therefore still clearly obtaining the legacy emergency number from somewhere.

These figures correlate well with GNI’s own post-call research (which has been undertaken for many years) (and extract of which is presented in Table 3 below) where emergency callers are asked where they obtained our number from. Of the [REDACTED] callers surveyed over the course of 2022, 58.8% obtained the emergency number from a website, 12% obtained it from a gas bill, 4.6% obtained it from a TV advert and 1.4% obtained it from a radio advert – all of which should be reliable, up-to-date sources of the new number (76.8% total). The remainder obtained the number from sources such as the phone book, friends/ family, a sticker on a boiler or other sources (including stickers on gas meters), all of which may or may not have displayed the new number.

	2022												Sum	Percentage	
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec			
Phone book															0.60%
TV advertising															4.64%
Website															58.83%
Gas bill															11.98%
Radio advertising															1.35%
Friend/family															2.99%
Newspaper advertising															0.00%
Sticker on a boiler															10.78%
Other, please specify															8.83%
															100.00%

**Table 3 – 2022 Gas Emergency Service – Number Origin Data**

Whilst Gas Networks Ireland does not dispute that ComReg’s own research returned the results it did, the results do not reflect the proven behaviour of actual callers and is therefore of little relevance or use in this assessment.

- (c) Of more importance, and where the use of consumer research is more relevant, is in the prediction of how customers might behave in the future, should they be unable to get through on an emergency line (consumer research is more relevant here since it is not possible to determine actual behaviours for a future hypothetical scenario).

Whilst Gas Networks Ireland’s own, independent face-to-face consumer research (undertaken by Behaviour and Attitudes in January 2023, copy supplied), also determined that the majority of people would, in the event of an situation which requires reporting to the gas emergency number (and on being unable to get through), find the correct number either online or an alternative reliable source such as a recent gas bill (24% for an incident inside the home, 21% for an incident on the street), or would dial an alternative number which would ultimately result in the incident being reported (54% for an incident inside the home, 59% for an incident on the street), there remain a proportion of the population who would not search in a suitable location for such information and would ultimately give up (or would continue redialling for an extended

period of time) (21% for an incident inside the home, 20% for an incident on the street). The consultation document does not consider these people or the risk they are exposed to if the legacy numbers are terminated. Just as the only determination of the acceptability of call volumes to the legacy NGNs is ComReg’s belief that they are “relatively low”, so the same belief is applied to the assessment that the “vast majority” is sufficient to mitigate the risk to public safety.

Gas Networks Ireland considers that these legacy NGNs can be terminated only once it is demonstrated that the residual risks are quantified as being below objectively acceptable levels based on recognised public safety risk thresholds.

- (d) Gas Networks Ireland supports the eventual cessation of legacy utility NGNs. However, whilst the original decision to consolidate NGNs may have been made to remove consumer confusion around NGNs, no information is presented in the consultation document to support any assertion of continuing confusion around NGNs. In fact, since there are only a very small number of NGNs remaining in operation and since this consultation only applies to 6 such numbers, none of which are actively publicised, all of which have alternative 1800 replacements and all of which are now covered by geolinking, it would seem that the argument is no longer valid, or is, at least, significantly reduced from the original case prior to the consolidation of NGNs. The fact remains that despite all of the efforts made by Gas Networks Ireland to publicise its new emergency number, nearly 19% of callers to the service still use the legacy number – demonstration that they are clearly not deterred from doing so. Since these legacy NGNs continue to be utilised by the public for the purposes of safety any decision to terminate them must be made on grounds of public safety risk.
- (e) As mentioned Gas Networks Ireland supports the eventual cessation of legacy utility NGNs, however no information is presented within the consultation document regarding the cost and efficiency of keeping these number ranges open (except for a comment made by a telecom operator to a previous consultation). Gas Networks Ireland understands that the legacy 1850 numbers operate on the same platform at the 1800 system. If an argument is to be made regarding the costs of keeping these numbers open then an assessment must also be made, not only of the costs of keeping them open, but of the income that they continue to generate for telecom operators and the costs that would be incurred in order to assure public safety in the event that they are terminated. No such assessment has been presented. Gas Networks Ireland’s position is that gas consumers should not be burdened with further costs associated with safely terminating these lines in order that telephone callers may avail of cheaper and/ or more transparent call costs. If telephone consumers and operators are the beneficiaries of termination, then they should shoulder the costs.
- (f) Gas Networks Ireland has spent considerable effort and monies since the original NGN decision was made to transfer all of its public facing telephone lines to new NGNs. Numbers were migrated and have been actively publicised long before the bulk of NGNs were switched off in January 2022. The NGNs that were retained were only those associated with public safety and are widely displayed on a significant number of long-life assets where replacement would be time consuming and costly, even if undertaken during routine visits. Furthermore, numbers are also retained by consumers (for example, stored on phones and written on noticeboards) where Gas Networks Ireland has no control whatsoever. These legacy numbers have been used and displayed for decades and are often located on assets with life spans of 20 years or more – a 5

year timeframe is only a fraction of this. Gas Networks Ireland believes that it has done (and is continuing to do) all that is reasonably practicable to enable and encourage users of its safety-related services to avail of the new NGN numbers. Despite this, nearly 19% of callers are still calling the legacy 1850 emergency number. Further costs, and/ or increased public safety risks arising from a decision to impose a deadline that has no objective justification is both unreasonable and potentially unsafe.

GNI is currently undertaking a Quantitative Risk Assessment to determine the residual risks associated with terminating its legacy NGNs and whether they meet recognised acceptable thresholds<sup>2</sup>. This assessment is based on accurate call data and face-to-face research undertaken by Gas Networks Ireland. This work is not yet complete.

If this assessment determines that the legacy NGNs can be terminated without resulting in an unacceptable risk to public safety and/ or without resulting in an unreasonable financial burden on gas consumers then Gas Networks Ireland would likely agree with the termination of these numbers. Until then, they should remain open to continue to provide the public service to those users who continue to use them.

#### **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. 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.*
- 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**

As mentioned above, Gas Networks Ireland supports the eventual cessation of legacy utility NGNs and will continue to take all reasonably practicable measures to ensure that users of these services can contact it.

Regarding the recommendations above:

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<sup>2</sup> Risk thresholds are contained in "ALARP Guidance Part of the Petroleum Safety Frameworks and the Gas Safety Regulatory Framework", Commission for Energy Regulation Policy Document CER/16/106, 2016.

Gas Networks Ireland is exploring the possibility of putting an in-call announcement on its legacy NGNs indicating that there are new numbers to call and may introduce such an announcement if it is practical to do so without interfering with call handling, particularly for callers to the new 1800 numbers. Gas Networks Ireland does not, however, believe that this will make a material difference to the volumes of calls received on these lines. The reason for this is that the vast majority of callers are infrequent users of these services. For example, in 2022 Gas Networks Ireland recorded [REDACTED] calls (i.e. answered by a human) to its Gas Emergency Service (with the split between 1800 and 1850 numbers in January 2023 of approximately 81%/ 19%). There are approximately 720,000 gas connections in the Republic of Ireland and around 35% of the population use natural gas for heating and/ or cooking. The average gas user therefore calls the gas emergency service less than once every 50 years. Even accounting for the fact that some users will clearly call more frequently than others, the number of frequent callers is low. A message applied to the line now will only inform a relatively small number of potential services users before 30 November 2023 and will not have any material impact on the risk arising to callers after that date.

Gas Networks Ireland already promotes and advertises its Gas Emergency and Dial Before You Dig services widely via widespread national multimedia campaigns. In the case of the Gas Emergency Service, this includes TV, radio, online, digital, cinema and social media. In the case of Dial Before You Dig this is a campaign aimed at a niche audience and so it is advertised online, digital and social media as well as national press and specialist trade press. Telephone numbers on the campaign material were updated in 2021 and in fact, Gas Networks Ireland made an entirely new TV advert in 2021 solely because of the change in the emergency telephone number. Numbers are updated on our website, on fleet vehicles on brochures and leaflets and have been since 2021. Numbers are also updated and correct on Directory Enquiries and Golden Pages websites. Whilst it would, of course, be possible to undertake additional advertising this would be expensive and Gas Networks Ireland's position is that gas consumers should not be burdened with further costs associated with safely terminating these lines in order that telephone callers may avail of cheaper and/ or more transparent call costs, particularly when other options exist if required (such as retaining the lines). If telephone consumers and operators are the beneficiaries of termination, then they should shoulder the costs.

Whilst terminating the numbers ahead of the proposed 30 November deadline may have some merit in terms of identifying and managing any internal processes that are impacted, Gas Networks Ireland does not believe that this will not have any material impact on the public safety risk arising after that date.

## 5 I.P. Telecom

**From:** Porting <[REDACTED]>  
**Sent:** Tuesday 18 April 2023 16:50  
**To:** Market Framework Consult <[REDACTED]>  
**Subject:** [I.P. Telecom Support] Re: [Restricted] ComReg Consultation on Review of Utility NGNs Extension

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

## Please do not write below this line ##

Hello marketframeworkconsult,

Your support ticket ([#104700](#)) has been solved. #

We hope you agree!

If you have any further comments please reply to this email.

IP Telecom

---

**Deb Tierney (I.P. Telecom Support)**

Apr 18, 2023, 16:49 GMT+1

To whom it may concern,

Please find below IP Telecom's response in relation to its Review of Utility Non-Geographic Numbers,

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.

Yes, IP Telecom agree, the Utilities have had an extended period of time to address the use of legacy NGNs. From the research and call data it seems as though the public have moved on from the legacy numbers and so they should be discontinued along with the other legacy NGNs.

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.

Yes, IP Telecom agree, this seems like a reasonable approach, and mirrors the steps taken by other NGN users prior to the initial switch off of 1850/1890 numbers which was very successful by and large. [REDACTED], we will continue to forward the allowed NGN exceptions until the end of November 2023 as previously agreed, but take no further action at this time.

---

Kind Regards,  
Debs



## **6 Tesco Mobile Ireland Limited**



Ms Karen Dunne  
Commission for Communications Regulation  
1 Dockland Central  
Guild Street  
Dublin 2  
**BY EMAIL:** [REDACTED]

20 April 2023

Dear Karen

I refer to ComReg Doc. No. 23/27, “Review of Utility Non-Geographic Numbers Extension” (the “Consultation”). For the reasons set out in the Consultation, Tesco Mobile Ireland Limited (“Tesco Mobile”) hereby supports ComReg’s proposal to not extend the permitted use of utility non-geographic numbers beyond 30 November 2023.

With kind regards.

*(bears no signature, sent by email)*

**MARK HUGHES**

Legal and Regulatory Affairs Consultant

*For and on behalf of Tesco Mobile*

## 7 Three

# Three

## **Three's response to the Consultation by ComReg on Review of Utility Non- Geographic Numbers Extension**

**19<sup>th</sup> April 2023**



**Three.ie**

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## 1 Introduction

ComReg had consulted extensively on the rationalisation of the use of Non-Geographic Numbers in Ireland prior to adopting its decision D15/18 in December 2018, which set the date for the discontinuation of the 1850 and 1890 ranges in Ireland.

In reaching its decision ComReg carried out a detailed assessment of the responses received including those from the Commission for Utilities Regulation (CRU), Gas Networks Ireland (GNI), Irish Water and ESB Networks (ESBN).

ComReg set out a transition period of three years from the date of its Decision prior to the withdrawal of the affected number ranges. Subsequent to the Decision an extension of a further two years was given to GNI, Irish Water and ESB for a total of six numbers. The utilities in question have therefore had a total of 5 years from the date of the Decision to prepare for their withdrawal.

Based on the information in the current consultation document, there does not appear to be compelling reasons to grant a further extension and Three supports ComReg's proposal not to grant such an extension.

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## 2 Responses to Consultation Questions

### Consultation Question 1

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.

#### Three Response:

Three agrees with ComReg's assessment of the Utility NGNs and endorses the proposal to proceed as planned with the cessation of the Utility NGNs from 30 November 2023.

#### Engagement with CRU and Utilities

Three notes that the Consultation outlines that ComReg engaged with CRU and the 3 utilities concerned during 2022. These engagements occurred after the cut-off date for the wider withdrawal of the affected number ranges from the Irish market.

Three wishes to make some observations regarding the engagement topics as outlined in the Consultation document.

#### CRU

Three notes that the Consultation document sets out that the CRU undertook to liaise with EBSN, GNI and Irish Water regarding the advertising of the replacement contact numbers and that in early 2023 ComReg made a further request to CRU to liaise with the utilities in respect of the updating of contact material.

#### ESB Networks

Three notes that EBSN outlined that the most onerous aspect of the updating physical assets with replacement numbers was street cabinets. EBSN outlined that the maintenance cycle for these is typically four years. As ComReg sets out in footnote 76 of the Consultation document (page 45), this is less than the 5 years between the original ComReg Decision and the extended cut-off date. Based on EBSN's own maintenance cycle most cabinets should have already been updated had it commenced the updating process reasonably promptly.

Three also observes that in ComReg document 18/106, at paragraph 145, ComReg noted the announced commencement of a smart meter roll-out program by the ESB. This potentially presented an opportunity for EBSN to provide updated contact number material to end-users at marginal cost. The Consultation document does not set out whether EBSN provided any feedback on its assessment of this.

## Gas Networks Ireland

Three welcome's GNI's input to the survey methodology used by ComReg for this consultation. Three notes GNI's update that all new gas meter installations now display the replacement 1800 contact number.

Three also observes that in ComReg document 18/106, at paragraph 144 ComReg noted that gas boiler maintenance must be carried out by registered gas service engineers at a recommended annual interval. Three notes that due to the defined nature of the register for gas service engineers, customer contact and communications associated with servicing potentially presented an opportunity for GNI to provide updated contact number material (e.g. by affixing a new "contacts" label to boilers) at marginal cost. The Consultation document does not set out whether GNI provided any feedback on its assessment of this.

## Irish Water

Three notes that the Irish Water had indicated that its use of NGNs should not be classified as "emergency" but rather as "priority". In this regard Three is of the view that Irish Water might more properly be grouped with other users of NGNs such as Banks where the numbers are used to report service issues rather than safety issues. These other users did not receive the benefit of an extension in their use of NGN. Three also notes that Irish Water was expecting to have completed replacement of all of its signage by the end of 2022.

## General observations on engagement with CRU and utilities

Three notes that in the energy market many service providers offer both gas and electricity. The use of common material which includes the contact numbers for all three utilities would potentially allow the more rapid dissemination of contact numbers. Three notes that the consultation document does not outline whether, during ComReg's engagement, there was any discussion of co-ordinated activity across the electricity, gas and water sectors.

The Consultation document was published two thirds of the way through the extension period and four and a half years since the original decision. It outlines that "*ComReg continues to maintain an open dialogue*" with each of the utilities. The Consultation document does not set out that, as of the date of its publication, the CRU or any of the utilities raised any substantive concerns regarding the withdrawal of the affected numbers in November 2023.

## Market Research

Three notes the extensive market research carried out by ComReg. Three believes that the conclusions that ComReg has drawn relating to the risk of unreported incidents are supported by the market research data and therefore provide a strong



basis for ComReg's preliminary position that there should be no further extension for the use of the utility NGNs.

### **Call Volumes**

Three notes the very substantial reduction in call volumes to legacy NGNs. From the consultation document it is not clear the extent to which there are further measures that the utilities could take to accelerate the trend in advance of November.<sup>1</sup> However even without such acceleration Three believes that the call volume data supports the conclusions that ComReg has drawn relating to the risk of unreported incidents are supported by the market research data and therefore provide a strong basis for ComReg's preliminary position that there should be no further extension for the use of the utility NGNs.

### **Impacts of further extension**

If ComReg was minded to grant an extension for the use of utility NGNs it is not clear from the information in the Consultation document that a short extension would be of much practical benefit. On the other hand, a further lengthy extension would, for all practical purposes, create a new class of numbers which could be described as "Utility Emergency Access Numbers". The Consultation does not address the number management policy issues associated with the ad hoc creation of a new class of numbers (these include retail charging, wholesale charging, porting, etc.). Three is of the view that these aspects would need to be addressed before a properly grounded Decision could be made to grant a further lengthy extension.

ComReg correctly identifies the operational burdens on telecommunications operators and the issues for end-users of maintaining parallel sets of "emergency" contact numbers. When taken in conjunction with the ComReg analysis of the market research and the call volumes this further supports ComReg's preliminary position that there should be no further extension for the use of the utility NGNs.

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<sup>1</sup> For example before connecting calls to the old numbers placing recorded announcements advising of their withdrawal and providing the new number, this is potentially most relevant to Dial Before You Dig.

**Consultation Question 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.

**Three Response:**

Three notes that it is for the relevant utilities to decide how to effect the retirement of legacy 1850 and 1890 numbers, in a manner which minimises end-user impacts and ensures the effectiveness of the replacement numbers from a public safety perspective.

Notwithstanding this position, Three believes that ComReg's recommendations represent viable and effective mitigations for potential adverse impacts arising from the discontinuation of these numbers.

Three notes that other mitigations might also be possible and, in line with our previous comment, that it is for the relevant utilities to identify and choose the mitigations that might be most appropriate to their individual circumstances.

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