



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

# Updating the Numbering Conditions of Use and Application Process Document

Non-Confidential Submissions to  
Consultation 19/88

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## Submissions to Consultation

**Reference:** ComReg 19/104s

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

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## Submissions Received from Respondents

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## 1: EIR Group

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**eir**

**Response to Call for Inputs:**

**Updating the Numbering Conditions and Application Process**

**ComReg Document 19/88**



**25 October 2019**



eir response to 19/88

**DOCUMENT CONTROL**

<b>Document name</b>	eir response to ComReg 19/88
<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'.





eir response to 19/88

## **Response to consultation**

eir welcomes the opportunity to respond to ComReg's Consultation in relation to updating the Numbering Conditions of Use and Application Process document. We note however that the majority of the proposed amendments are implementing text already established in ComReg Decisions from June 2018 (D06/18) and December 2018 (D15/18). It is not clear why ComReg is only now undertaking the administrative task to update the Number Conditions or why ComReg feels the need to consult on some of the proposed administrative amendments.

### **Q.1 Do you have any comments on ComReg's proposed administrative amendments to the conditions relating to M2M Numbers?**

ComReg is proposing administrative amendments to align with its Decision (D06/18) which set the rules for the allocation of numbers from the 088 range for machine to machine (M2M) services. As noted already it is not clear to eir why ComReg is making the administrative changes so late after the Decision was issued in June 2018. Nor is it clear why ComReg feels it necessary to consult on this matter with number of pages of apparent 'analysis' in the consultation paper. In D06/18 the ComReg Decision Instrument states for each textual change that ComReg "*adds the following text to the [relevant reference] of the Numbering Conditions*". ComReg has not deviated from the text established in D06/18 and yet is seeking comments on the 'proposed' amendments. eir is aware that ComReg has already allocated numbers from the 088 range on foot of D06/08 and it is not clear why ComReg appears to be introducing uncertainty as to the rules that should apply for the use of 088 numbers. Is ComReg re-consulting on the matters covered in D06/18? eir requests that ComReg clarifies the scope of consultation in respect of 088 numbers.

To the extent that ComReg may deviate from the text established in D06/18 eir would note that a more forward looking identifier for the 088 range would be Internet of Things rather than M2M.

eir reserves the right to make further comments on the numbering rules for 088 when ComReg confirms the scope of consultation.

### **Q.2 Do you have any comments on ComReg's proposed amendments to the conditions relating to Non-Geographic Number Review?**

ComReg's approach to incorporating the textual changes to the Numbering Conditions established in D15/18 raises similar questions to those in our response to question 1. i.e. the timeliness of the administrative changes and the scope of this consultation exercise. We note that ComReg has



eir response to 19/88

deviated from the text established in D15/18 with the deletion of “~~With the exception of 076 numbers used to provide emergency services, and~~”. Is it this change from the D15/18 text that ComReg is consulting on? If yes, eir has no objections. However we would be grateful if ComReg could clarify the scope of consultation in respect of the text set out in D15/18. eir reserves the right to make further comments on the numbering rules for Non-Geographic Numbers (NGNs) when ComReg confirms the scope of this consultation.

**Q.3 Do you agree with ComReg’s proposed other administrative updates to the Numbering Conditions of Use and Application Process?**

ComReg is proposing to delete reference to 'Bursty Traffic Numbers' on the basis that “*recent discussion with operators has indicated that the identification of these numbers may not be important for current networks*”. eir has been unable to identify who in eir was canvassed by ComReg. We would be grateful if ComReg could confirm where this discussion took place and provide the minutes of same.

eir objects to the proposed deletion of section 4.4 of the Numbering Conditions. There is still a clear requirement for Bursty Traffic Numbers to be identifiable so that traffic may be managed on our legacy exchanges reducing the risk of call set-up failures occurring.

**Q.4 Do you agree with ComReg’s proposal to introduce a new condition of use requiring that all applications for 1800 and 0818 NGNs must be supported by a valid end user order/request?**

ComReg proposes to add to the grounds for refusal of an Application for numbers in section 6.6 “*In the case of 0818 and 1800 numbers, the customer details have not been provided by the applicant.*” eir has no objection in principle to this proposed amendment however there may be merit in further refining the text to be clear on what is meant by ‘customer details’. This is covered in paragraph 59 of the consultation which highlights what was agreed at NGN WG-8. As such the text should be amended to read –

“*In the case of 0818 and 1800 numbers, ~~the a unique customer identifier details have~~ not been provided by the applicant*”.

**Q.5 Do you agree with ComReg’s proposal to make mobile numbering resources available for TETRA services in Ireland and its specific proposal to make an initial assignment of 100K 089 numbers to OGCIO/Tetra Ireland at this time?**



eir response to 19/88

ComReg is proposing that OGCIO/Tetra Ireland be treated like a mobile operator and be eligible for mobile numbering resources. eir notes and agrees with ComReg's expectation that such numbers should be treated no differently from a wholesale and retail charging perspective.

**Q.6 Do you have any views or insights to share on the potential user switching mechanisms between TETRA and commercial mobile networks?**

It is our understanding that TETRA is not a public network because only pre-defined users groups (primarily the emergency services) may be registered users of the TETRA network. The concession to operate and manage the Tetra network is awarded by way of Government tender. A new tender is expected shortly and this will determine the TETRA network operator for a number of years. It would therefore appear logical that Mobile Number Portability (MNP) of individual TETRA numbers will not be required.

As ComReg will be aware from previous engagements the addition of a new operator into the industry MNP solution is both expensive and time consuming. eir therefore requests clarification in advance as to whether MNP will be a requirement for the proposed 089 X range. If there is a requirement for MNP then the OGCIO should be aware that it will be required to contribute to the costs of operating the industry MNP solution.

**Q.7 Do you agree with ComReg's proposal to permit the presentation of 1890 and 0818 CLIs, following the implementation of the Geo-linking tariff condition on 1 December 2019?**

eir agrees with the ComReg proposal to permit presentation of 0818 CLIs.

eir does not agree with ComReg's proposal to permit presentation of 1890 CLIs. From a technical perspective 1890 is not E.164 compliant and therefore 1890 CLIs should not be presented for call return. If an attempt is made to establish a call to a 1890 CLI our switches will see 1890 and convert to E.164 and try and present a Dublin 01890 xx number. This Dublin number range is currently in use.

Given that 1890 will be withdrawn in two year's time and taking account of ComReg's rationale for withdrawal, we believe it would be wrong to allow the presentation of 1890 CLIs when their use is being discouraged. The presentation of 1890 CLIs could also add to the consumer confusion argued by ComReg in its NGN review.



eir response to 19/88

**Q.8 Do you have any views on any issues not discussed in this document and/or on issues which you feel are appropriate to the draft Numbering Conditions?**

eir would like to raise the following issues:

**Re-designation of 076 as ‘Standard Rate Numbers’:** ComReg proposes to re-designate the chargeable NGNs as ‘Standard Rate Numbers’. eir notes that ComReg has not asked a question on this proposal in the consultation document. eir has no objection to the use of the term ‘Standard Rate Numbers’. However the related changes to the Numbering Conditions proposed by ComReg may have unintended consequences on other regulatory measures.

ComReg proposes to delete all reference to Nomadic Numbers (the description for 076) from the Numbering Conditions. ComReg’s Fixed Voice Call Termination Decision D10/19, Annex 16, imposes regulatory obligations in respect of Fixed Numbers. A Fixed Numbers is defined in D10/19 as “*a number from the Irish national numbering scheme as set out in the Numbering Conditions of Use, which, within the meaning of this Decision Instrument, is terminated at a fixed location and means a Geographic Number, a Nomadic Number, or an emergency access number (112 or 999)*”. [emphasis added]

It would seem that if Nomadic Number is deleted from the Numbering Conditions then the current fixed termination rate price control obligations would fall away from 076 numbers. The definition of Nomadic Number should be retained in the Numbering Conditions, albeit that such definition can point to 076 being a Standard Rate Number.

**Facilitating International Access to Irish Freephone numbers:** eir notes ComReg’s observation in paragraph 52 that other issues that may require changes to the Numbering Conditions are actively being considered by the NGN WG. In particular ComReg references the possible retention of a small number of 1850 numbers for utility safety numbers and facilitating international calls to 1800. Any changes arising in respect of these matters will be subject to public consultation prior to any changes being implemented.

With regard to facilitating international calls to 1800 we ask that ComReg acknowledge the real and serious technical issues with this proposal as these concerns are not being properly considered in the NGN WG. 1800 is not E.164 compliant. The correct way to make 1800 international's is to convert 1800 to 0800. An inbound international call to an Irish Freephone number e.g. 003531800xxxxxx will be recognised on our switches as a Dublin 018xxxxxx number as per International standards. We note that international calls can be made to Irish 0818 numbers as



eir response to 19/88

these numbers are E.164 compliant. It would only be possible to facilitate international calls to Irish Freephone numbers if the number range is migrated to 0800.

**Demand for geographic numbers:** eir acknowledges that the decision to withdraw 076 has already been taken. The withdrawal of 076 will see an upsurge in demand for geographic numbers which may place strain on some geographic number ranges depending on the area they are required in. 076 is often used as a DDI service on VOIP so for example there will be some business customers with many thousands of numbers which will be migrated to geographic numbers. eir requests that ComReg confirms what measures it has in place to ensure the demand for geographic numbers driven by the migration from 076 will be met.

**Regulatory Impact Assessment (RIA):** eir disagrees with ComReg's proposed conclusion that no RIA is required. ComReg states in paragraph 86 that assigning a block of 089 X numbers to OGCI "should therefore be straightforward and one of low cost for industry". In our response to question 6 we highlighted that opening the range could be expensive and time consuming if there is a requirement for the numbers to be individually portable and the consultation does not provide any clear guidance on this matter. Therefore there is a potential for significant costs to arise and these have not been properly considered. The purpose of RIAs is to rigorously assess the potential costs and benefits of regulatory proposals and there is a clear need for one to be undertaken in regard to the proposals in this consultation.

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## 2: OFFICE OF THE GOVERNMENT CHIEF INFORMATION OFFICER

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Commission Regulation - Updating the Numbering Conditions of Use and Application Process Document  
Consultation  
OGCIO Response

### Consultation Questions and OGCIO Responses

#### Q.1

No Comment

**Q.2 Do you have any comments on ComReg's proposed amendments to the conditions relating to Non-Geographic Number Review? Please explain the basis for your response in full and provide supporting information.**

We agree with the approach as outlined in the consultation document and OGCIO will work with ComReg to replace the current 076 number range currently in use across the Public Sector.

#### Q.3

No Comment

#### Q.4

No Comment

**Q. 5 Do you agree with ComReg's proposal to make mobile numbering resources available for TETRA services in Ireland and its specific proposal to make an initial assignment of 100K 089 numbers to OGCIO/Tetra Ireland at this time? Please explain the basis for your response in full and provide supporting information.**

OGCIO agrees with this proposal. A significant portion of the current allocation of 076 numbers is used on devices that attach to the network currently provided by Tetra Ireland, the contracted partner for the provision of Public Safety Network in Ireland.

Post the retirement of 076 numbers OGCIO will continue to have a requirement for a number range specifically allocated to Public Services using existing infrastructure provided by Tetra Ireland, and in the future on any provider infrastructure or technology that meets the requirements of a Public Safety Network at that time.

Today a number of Agencies use their devices for both inbound and outbound calling with the delivery of more real time services across the Public Service the expectation is that this practice will increase significantly. Therefore the ability for devices to have the same functionality as any other mobile device will be a requirement. While the retirement of 076 numbering will be challenging it also presents an opportunity to review where Ireland is in terms of its Public Safety Network and future proof this network aligning with the approach adopted by other equivalent bodies in EU Member States and ensuring it can avail of E.212 Mobile Network Code. 089 numbers are used predominately by MVNOs where the Public Safety Network can be a combination of MVNO and dedicated in-fill as outlined in ComReg 19/59e. The proposed use of the 089 number range will therefore not deviate from its current use.

**Q. 6 Do you have any views or insights to share on the potential user switching mechanisms between TETRA and commercial mobile networks? Please explain the basis for your response in full and provide supporting information.**

OGCIO have dedicated routes to all the major infrastructure providers both fixed and mobile. At present 076 numbers are assigned to devices that are on the network provided by Tetra Ireland. The switching of the traffic from Tetra Ireland's infrastructure is managed via the voice switching core on OGCIO's Government Network.

Tetra Ireland provide specific infrastructure and coverage and while the numbers in use on this network, OGCIO could port these numbers, however there would be little point in this as the specific functionality that any tetra network offers would be lost. Any future Public Service network that is based on a technology available from commercial carriers where the services offered are suitable for use on a Public Safety Network, then number portability becomes achievable.

**Q.7**

No Comment

**Q.8**

No Comment

## 3: EQUANT NETWORK SYSTEMS (EQUANT)

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**From:** [frederique.imbrechts@orange.com](mailto:frederique.imbrechts@orange.com)  
**To:** [Market Framework Consult](#)  
**Cc:** [777 FCS NRA Enquiries to Orange Business Services](#)  
**Subject:** Reference: Consultation 19/88 "Updating of the Numbering Conditions of Use and Application Proces"  
**Date:** 24 October 2019 14:48:25  
**Attachments:** [image002.png](#)

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Dear Mr Mahon

Please find below Equant Network Systems Ltd' s (hereafter "Equant") answers to the questions listed in Consultation 19/88.

- Q. 1 Do you have any comments on ComReg's proposed administrative amendments to the conditions relating to M2M Numbers? Please explain the basis for your response in full and provide supporting information.  
Response to Q. 1: No comment from Equant.
- Q.2 Do you have any comments on ComReg's proposed amendments to the conditions relating to Non-Geographic Number Review? Please explain the basis for your response in full and provide supporting information.  
Response to Q. 2: No comment from Equant.
- Q.3 Do you agree with ComReg's proposed other administrative updates to the Numbering Conditions of Use and Application Process? Please explain the basis for your response in full and provide any supporting information.  
Response to Q. 3: No comment from Equant.
- Q.4 Do you agree with ComReg's proposal to introduce a new condition of use requiring that all applications for 1800 and 0818 NGNs must be supported by a valid end user order/request? Please explain the basis for your response in full and provide supporting information.  
Response to Q. 4: Equant perfectly understands and agrees with the need to correctly register the real customers intending to use 1800 and 0818 NGNs. However, if Equant has to communicate each and every customer prior to being granted 1800 or 0818 NGNs, it would put Equant in a difficult position as customers asking for such numbers very often require number activation within very tight lead times. Therefore, Equant proposes to be granted 10 to 50 spare numbers already activated in its name so as to be able to quickly respond to its customers' needs. Upon allocation of a number/numbers to the actual customer, Equant would update the record to reflect the actual customer without undue delay.
- Q. 5 Do you agree with ComReg's proposal to make mobile numbering resources available for TETRA services in Ireland and its specific proposal to make an initial assignment of 100K 089 numbers to OGCIO/Tetra Ireland at this time? Please explain the basis for your response in full and provide supporting information.  
Response to Q. 5: No comment from Equant.
- Q. 6 Do you have any views or insights to share on the potential user switching mechanisms between TETRA and commercial mobile networks? Please explain the basis for your response in full and provide supporting information.  
Response to Q.6 : No comment from Equant.
- Q. 7 Do you agree with ComReg's proposal to permit the presentation of 1890 and 0818 CLIs, following the implementation of the Geo-linking tariff condition on 1 December 2019? If you do not agree, please explain the basis for your response in full and provide supporting information.  
Response to Q. 7: No comment from Equant.
- Q.8 Do you have any views on any issues not discussed in this document and/or on issues which you feel are appropriate to the draft Numbering Conditions? Please explain the basis of your response in full and provide supporting information.  
Response to Q. 8: No other issues or views from Equant.

Best regards



**Frédérique Imbrechts**

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## 4: TESCO MOBILE IRELAND

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**From:** [Hughes, Mark](#)  
**To:** [Conor Mahon](#); [Market Framework Consult](#)  
**Subject:** ComReg Doc. No. 19/88 - Submission  
**Date:** 25 October 2019 12:56:10

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Dear Conor,

Tesco Mobile responds to questions 5 and 6 of the above consultation (re: Tetra) as follows:

There is insufficient information contained in the consultation document in order for Tesco Mobile to consider ComReg's proposal and make an informed decision re: how to respond. For example, how does the Tetra system work? What is its exact purpose? How will it work/what will its purpose be in the future? As a result, will allocation of 089 numbers to Tetra cause confusion (as between Tetra Ireland and MVNO's)? How will calls to Tetra be routed/charged? Finally, what aspects of the regulatory framework apply/do not apply to Tetra? Given the nature of ComReg's proposal, namely allocation of mobile numbers to Tetra, Tesco Mobile proposes that ComReg establishes a forum involving ComReg, the OGCIO/Tetra Ireland and the mobile operators to clarify the above matters and obtain mobile operators' views.

If you have any questions or would like to discuss, please do not hesitate to contact me.

With kind regards.

Mark.

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## 5: THREE IRELAND (HUTCHISON) LIMITED

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# **Numbering Conditions and Application Process**

**Response to Document 19/88 from  
Three**

**25<sup>th</sup> October 2019**



**Three.ie**

## 1. Introduction

Three is pleased to respond to ComReg's consultation on updated Numbering Conditions. While most of the proposed amendments are essentially administrative matters for decisions that have already been well examined and consulted on, there are some proposals that are new and require further consultation. The new EECC will take effect in Irish law before the end of 2020, and overall the new Numbering Conditions should be consistent with the EECC but should not "cut across" it by addressing similar requirements in a slightly different way.

## 2. Response to Questions

*Q. 1 Do you have any comments on ComReg's proposed administrative amendments to the conditions relating to M2M Numbers? Please explain the basis for your response in full and provide supporting information.*

i) The main difference between mobile numbers and M2M numbers is that mobile numbers are primarily used for person-to-person communications while M2M are primarily communications between devices at this time. Person-to-person mobile services are well understood by both the industry and consumers. The main form of communication for M2M is expected to be data, however there will be many cases where a voice/audio connection is required also, e.g. where a parking barrier or a vending machine has a "help" button to connect using a voice channel, smart watches, and various new innovative forms of communication.

Three agrees with the main thrust of the proposed insertion of condition 2:

*"2. An M2M Number shall only be used for the provision of an M2M Service or a bundle of services in which an M2M service is a predominant component",*

with the following definition of M2M:

*"M2M service" means a service consisting of the exchange of data between devices, over a public electronic communications network, with limited or no human intervention".*

This definition, however, must not be read to exclude or limit person-to-person or voice use where this is incidental to the M2M use or where the service is not a traditional interpersonal communication service. The whole area of IOT is innovative and constantly evolving to include new forms of machine to person, and even person-to-person communication. There is a requirement to distinguish M2M from existing traditional communications, however we have a concern that the proposed definition might prove to be limiting. We note in Article 93 of the EECC (which deals with numbering) that when reference is made to M2M/IoT it is described as "*electronic communications services other than interpersonal communications services, throughout the territory of the Union*". This manages to distinguish M2M from traditional services without imposing a limiting definition. ComReg should consider a similar approach.

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Doc 19/88, Numbering Conditions

ii) ComReg has proposed the inclusion of condition 3 as follows:

3. *“The number holder shall ensure that M2M Numbers used extraterritorially are used in compliance with consumer protection and other national rules in the country in which they are used”.*

It is noted that there is a general requirement which is similar to the above Article 93(4) of the EECC, however care should be taken to avoid imposing conditions that are different to those in the EECC, and it might be premature to impose this condition at this time, for example:

- Article 93(4) is limited in geography – it only refers to use within the EEA. Within the EEA, the regulatory framework is largely consistent, so compliance should be achievable. This is not necessarily the case outside of the EEA, and the above could be an onerous obligation on undertakings to be aware of all the national and consumer protection rules globally and in a global market it is also unclear how ComReg would interpret and enforce conditions that apply in markets outside of the EEA – perhaps that should be left to the local regulatory authority.
- In addition to the above, it is noted that the definition of extraterritorial use is derived from use on a “*permanent basis*” or by “*permanent international roaming*”, however it is unclear when roaming would be considered to be permanent. Three suggests that the same definition should be used as for the Roaming Regulation (4 months).

iii) rights of use for M2M numbers are to be granted to “*MNOs, MVNOs and only to M2M Service Providers that can both justify the requirement and can manage the resources*”. There is no measure of what is necessary to justify the requirement though, or to demonstrate ability to manage the resources. It would be more transparent if the main criteria for these two measures could be defined.

iv) Three supports the addition of text to paragraph 6.2(2) requiring that an OTT has a contract with an Irish MNO, but suggests that this should be a continuing requirement for use of the numbers. This would prevent an OTT from seeking a contract with an MNO simply to qualify for the number assignment, only to terminate it shortly afterwards.

*Q.2 Do you have any comments on ComReg’s proposed amendments to the conditions relating to Non-Geographic Number Review? Please explain the basis for your response in full and provide supporting information.*

No comments.

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Doc 19/88, Numbering Conditions

*Q.3 Do you agree with ComReg's proposed other administrative updates to the Numbering Conditions of Use and Application Process? Please explain the basis for your response in full and provide any supporting information.*

No comments.

*Q.4 Do you agree with ComReg's proposal to introduce a new condition of use requiring that all applications for 1800 and 0818 NGNs must be supported by a valid end user order/request? Please explain the basis for your response in full and provide supporting information.*

Three agrees with the proposal, however this must cater for all situations where an operator needs to obtain a number for an end user. A balance needs to be found between preventing number hoarding and creating barriers to legitimate users who need to obtain a number.

*Q. 5 Do you agree with ComReg's proposal to make mobile numbering resources available for TETRA services in Ireland and its specific proposal to make an initial assignment of 100K 089 numbers to OGCI0/Tetra Ireland at this time? Please explain the basis for your response in full and provide supporting information.*

Three has significant concerns in relation to the proposal to make mobile numbers available to Tetra. We are of the view that this matter should be the subject of a separate consultation or workshop where any relevant issues can be identified.

It should be noted that Tetra is not a publicly available mobile service, and any numbers used by Tetra would not have end-user portability rights, so there are some fundamental differences between the services provided on existing mobile numbers and Tetra. It is not clear how calls would be routed for termination on a Tetra network, or what commercial arrangements would apply. If a network decided not to open access to the numbers, then the protections in the existing regulatory framework might not apply as Tetra is not providing a publicly available service.

At this time, originating operators can perform a "look-up" for any mobile number and receive a routing code. If part of the 089 number range was to be taken outside of the porting system, then these ranges would need to be built separately by all routing operators, which would introduce cost. Operators might seek to recover these costs.

The 089 number range is likely to be understood by consumers at this time to be a mobile number range. The inclusion of a different service in that range might not be transparent, or might dilute the identity of the 089 range as being for mobile. For this reason, consideration should be given to using an alternative range.

Overall, Three is of the view that ComReg should hold a more in-depth consultation on this matter before any decision is made. This consultation should include alternative numbering options.



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*Q. 6 Do you have any views or insights to share on the potential user switching mechanisms between TETRA and commercial mobile networks? Please explain the basis for your response in full and provide supporting information.*

Number portability is a right obtained by end users on publicly available networks. This would not be the case with numbers on a private Tetra network. If the service was to be provided on an existing mobile network, then it might be preferable to assign the numbers to that existing network. They would then be portable in the same way as all other mobile numbers are.

*Q. 7 Do you agree with ComReg's proposal to permit the presentation of 1890 and 0818 CLIs, following the implementation of the Geo-linking tariff condition on 1 December 2019? If you do not agree, please explain the basis for your response in full and provide supporting information.*

Yes, three agrees with this proposal. In addition, given that most mobile tariff plans now include mobile numbers "in-bundle", it also makes sense to allow mobile numbers or M2M numbers to be displayed as a CLI.

*Q.8 Do you have any views on any issues not discussed in this document and/or on issues which you feel are appropriate to the draft Numbering Conditions? Please explain the basis of your response in full and provide supporting information.*

No Comments.

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## 6: VIRGIN MEDIA IRELAND LIMITED

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## **Virgin Media response to:**

Consultation: Updating the Numbering Conditions of Use and Application Process document

ComReg 19/88

25<sup>th</sup> October 2019

## Summary

Virgin Media Ireland Limited ('Virgin Media') welcomes the opportunity to respond to ComReg's Consultation ('the Consultation') on Updating the Numbering Conditions of Use and Application Process Document ('ComReg 19/88).

Virgin Media welcomes the consultation to update the Numbering Conditions of Use and Application Process and believes that the Conditions should be updated regularly to ensure that they reflect changes in Regulation and also take account of the dynamic nature of development within the electronic communications industry.

Virgin Media has responded to ComReg's Consultation questions in the following section.

## Response to Consultation Questions

Q.1 Do you have any comments on ComReg's proposed administrative amendments to the conditions relating to M2M Numbers? Please explain the basis for your response in full and provide supporting information

Virgin Media has no comments to make on this proposal but the changes appear to align with ComReg's related consultation in 2018.

Q.2 Do you have any comments in relation to ComReg's proposed administrative amendments to the conditions relating to Non-Geographic Number Review? Please explain the basis for your response in full and provide supporting information.

Virgin Media agrees with the proposed changes and they align with the decisions made in the non-geographic number review.

Q.3 Do you agree with ComReg's proposed other administrative updates to the Numbering Conditions of Use and Application Process? Please explain the basis for your response in full and provide any supporting information

Virgin Media agrees with the changes proposed. Section 6.2 of the draft revised conditions states that '*Rights of use for Mobile Numbers and MNCs shall only be granted to MNOs and MVNOs, and to OTT Service Providers, provided the OTT Service Provider qualifies as an ECS, and the OTT Service Provider has a contract with an Irish MNO to access its network*'. Virgin Media agrees with the inclusion of OTT Service Providers.

Q. 4 Do you agree with ComReg's proposal to introduce a new condition of use requiring that all applications for 1800 and 0818 NGNs must be supported by a valid end user order/request? Please explain the basis for your response in full and provide supporting information

Virgin Media has been an active member of the Non-Geographic Number working group (NGN WG) since early 2019. The proposal to introduce a new condition of use requiring that all applications for 1800 and 0818 NGNs must be supported by a valid end user order/request was discussed and agreed at previous NGN WG meetings.

Q. 5 Do you agree with ComReg's proposal to make mobile numbering resources available for TETRA services in Ireland and its specific proposal to make an initial assignment of 100K 089 numbers to OGCIO/Tetra Ireland at this time? Please explain the basis for your response in full and provide supporting information.

Virgin Media has no comments to make on this proposal.

Q. 6 Do you have any views or insights to share on the potential user switching mechanisms between TETRA and commercial mobile networks? Please explain the basis for your response in full and provide supporting information

Virgin Media has no comments to make on this proposal.

Q. 7 Do you agree with ComReg's proposal to permit the presentation of 1890 and 0818 CLIs, following the implementation of the Geo-linking tariff condition on 1 December 2019? If you do not agree, please explain the basis for your response in full and provide supporting information

Virgin Media agrees with this proposal.

Q.8 Do you have any views on any issues not discussed in this document and/or on issues which you feel are appropriate to the draft Numbering Conditions? Please explain the basis of your response in full and provide supporting information.

Virgin Media is of the view that the continued use of MNAs is outdated. MNAs limit the potential for business development and prevent businesses from having a virtual number in a different location. This should not be possible now given the rules around geographic numbers and MNAs. We are concerned that the current structure of the numbering conditions could lead to abuse because of the negative impact on business in Ireland, where the use of geographic numbers for non-geographic destinations would be of benefit. These businesses might have multiple sites and would like to present a similar geographic number to their customers no matter what site the call is made. Furthermore there is no use for stringent rules around MNAs because tariffs are aligned nationally. Virgin Media suggests that ComReg opens up a discussion with industry around the future relevance of MNAs.

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## 7: VODAFONE IRELAND LIMITED

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## **Vodafone response to ComReg 19/88**

# **Updating the Numbering Conditions of Use and Application Process Document**

Consultation ComReg 19/88



Vodafone welcomes the publication of this consultation on Number Conditions of Use and Application Process and the opportunity to respond.

## Consultation Questions

**Q. 1** Do you have any comments on ComReg's proposed administrative amendments to the conditions relating to M2M Numbers? Please explain the basis for your response in full and provide supporting information.

We have a number of comments to the following specific paragraphs from 19/88:

### Paragraph 26 and 27

We understand the need to allow the use of the new M2M number set to support eCall but we do not want these numbers to be used for non-specialised bundles. Hence we suggest that the phrase "predominant component" in paragraph 27 is too loose a phrase, and could be taken to include ordinary consumer bundles with large data allowances and ordinary voice access.

Voice services should be further restricted so that a service using these numbers can include emergency calling and call-back as part of the service but otherwise have limited voice capabilities. We refer to our submission to ComReg. We recommend that the M2M definition be amended to recognize this, in the following way:

- "M2M service" means a service consisting of the exchange of information between machines, through a mobile or fixed network, with limited or no human intervention. This includes emergency calling with limited voice capabilities".
- We want to avoid consumers using these numbers as voice terminating locations requiring a porting service.

### Paragraph 34

- ComReg's position that new Irish E.164 numbers for non-interpersonal services and Irish E.212 MNCs should be made available to be used on an extraterritorial basis for international M2M services.
- We have no objection to this process. With any additional allocation of numbers to new groups, any requirements for number porting should be clear to all parties.



## Paragraph 37

- We agree with proposals in paragraph 37 and believe strongly that it must be clear to any users of these numbers that they are subject to General Authorisation and the other specified regulatory obligations.

Q.2 Do you have any comments on ComReg's proposed amendments to the conditions relating to Non-Geographic Number Review? Please explain the basis for your response in full and provide supporting information.

We do not have any comment on the proposal.

Q.3 Do you agree with ComReg's proposed other administrative updates to the Numbering Conditions of Use and Application Process? Please explain the basis for your response in full and provide any supporting information.

We agree with the proposed update

Q.4 Do you agree with ComReg's proposal to introduce a new condition of use requiring that all applications for 1800 and 0818 NGNs must be supported by a valid end user order/request? Please explain the basis for your response in full and provide supporting information.

We agree in principal with this proposal.

We are happy to associate an application with a customer request. We would note however, that as part of normal commercial operations customers could discuss a possible service, ask for a number to be reserved, and subsequently decide not to proceed.

In other cases large corporate wish to reserve a short series of numbers for future services. The quantity of numbers involved here is small and should not have any impact on availability of NGN numbers,



**Q. 5** Do you agree with ComReg’s proposal to make mobile numbering resources available for TETRA services in Ireland and its specific proposal to make an initial assignment of 100K 089 numbers to OGCIO/Tetra Ireland at this time? Please explain the basis for your response in full and provide supporting information.

We note in Paragraph 51 that ComReg state the use of mobile numbers by TETRA was discussed at the NGN WG and “should be uncontentious”. We disagree with this statement. Discussion of TETRA at the WG was superficial and only in the context of OGCIO notes on general use by government of 076 numbers. Much more detailed consideration would need to be given to the extending rights of use to TETRA services in general and to the specific proposal to allocate a 100K block to this service.

In addition consideration would need to be given to rules on interconnect and termination rates.

Tetra was set-up to support a number of additional services such as group calling. We need to understand how these services will operate in the context of connection to mobile networks.

Porting will be particularly troublesome. If TETRA were to propose porting-in a significant number of numbers then further consideration would need to be given to spectrum, competition and state-aid issues.

**Q. 6** Do you have any views or insights to share on the potential user switching mechanisms between TETRA and commercial mobile networks? Please explain the basis for your response in full and provide supporting information.

As above, switching between TETRA and commercial mobile networks raised significant commercial as well as technical issues and needs further research and a separate consultation.



Q. 7 Do you agree with ComReg's proposal to permit the presentation of 1890 and 0818 CLIs, following the implementation of the Geo-linking tariff condition on 1 December 2019? If you do not agree, please explain the basis for your response in full and provide supporting information.

We do not have an objection to this in principle. Among consumers, there may be some delay in understanding that calls to 1890 numbers are charged as Geo rate, and because of this, consumers may then be reluctant to call back or perhaps even answer calls presenting this CLI.

Q.8 Do you have any views on any issues not discussed in this document and/or on issues which you feel are appropriate to the draft Numbering Conditions? Please explain the basis of your response in full and provide supporting information.

We have no additional comments.