



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Response to ComReg Consultation “*Proposal to extend Direction made pursuant to ComReg Document 18/108 and D16/18 (Management and Maintenance of the National Directory Database)*”

Response to Consultation 22/35

Submission to Consultation

Reference: ComReg 22/54S

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Commission for Communications Regulation

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**Commission for Communications Regulation**

Retail Policy
One Dockland Central
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North Dock
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Ireland

To: RetailConsult@comreg.ie

Subject: Submission to ComReg 22/35

Rotterdam, 2 June 2022

Dear Madam/Sir,

As directed by the Commission for Communications Regulation ("ComReg") under ComReg Decision D16/183 ("D16/18"), PortingXS ("PXS") manages and maintains the NDD for a minimum period of 3 years and up to 5 years, since 1 July 2019.

As the minimum period of 3 years is due to expire on 30 June 2022, ComReg issued Consultation ComReg 22/35 ("Consultation") on 5 May 2022, seeking stakeholders' views on ComReg's proposal to extend the direction and have PXS to continue to manage and maintain the NDD for a further 2 years. This means, PXS will continue to manage and maintain the NDD for the period 1 July 2022 to 30 June 2024.

With this letter, PXS would like to confirm and express our continued and unabated commitment to manage and maintain the NDD for this period. The product on the basis of which the NDD service is provided, is a core service within PXS's product portfolio for the telecommunications industry, and is part of our product roadmap and active product development.

We have successfully implemented and operated the NDD service together with ComReg and all other stakeholders. In the coming period, PXS would like to further engage with ComReg and the industry to discuss and evaluate opportunities for further improvements and developments of the NDD service for all involved stakeholders. Based on our product portfolio, our international experience and best practices implemented, we would like to explore additional opportunities that could be beneficial to the telecommunication industry in Ireland.

Therefore, PXS hereby formally states that we are in full agreement with ComReg's preliminary view that it is most appropriate to extend the direction pursuant to Document 18/108 and D16/18 on PXS to manage and maintain the NDD for the period 1 July 2022 to 30 June 2024.

Yours sincerely,

Marc Kruijs
SVP Sales & Marketing