



Wholesale charges for non-geographic numbers

Call for Input

Reference: 14/23

Date: 20/03/2014

Background to current deemed to be regime

Calls to non-geographic numbers are numbers whose retail charges to end users are capped within Ireland regardless of the location of either the caller or recipient.

Non-geographic numbers (which have a prefix in the format 18xx, for example 1850 or 1890) are used by organisations to allow incoming calls at a fixed or reduced rate. For example, a business may wish to have a unique number for its customers to call a help-desk or answering service.

Usually businesses requiring such unique non-geographic numbers (known as the “service provider”) will engage a telecommunications operator (the “hosting operator”) to handle the telecommunications aspects of the service and terminate the call. These telecommunication operators may be fixed-line or mobile operators.

In some cases a call may transit more than one fixed-line network before arriving at the service provider and the question arises as to how these additional operators are to be compensated for the use of their networks. The practice for many years has been that fixed-line operators have deducted a retention from retail revenues (“retention charges”). These have been based on Eircom wholesale interconnect rates which are currently regulated¹. This is to say that fixed-line operators have all levied the same retention charges as Eircom on a symmetric basis.

ComReg published an information notice on 29 January 2014 (ComReg document number 14/08²) inviting interested parties to attend an industry workshop to discuss proposals from one operator that the current system should be changed. This workshop was held on 27 February 2014. This document proposes next steps for the industry following on from the resulting workshops.

¹ See ComReg Decision Number D04/07.

<http://www.comreg.ie/fileupload/publications/ComReg0780.pdf>

² <http://www.comreg.ie/fileupload/publications/ComReg1408.pdf>

Summary of Industry Workshop Held on 27 February 2014 and 13 March 2014

At the first industry workshop, held at ComReg's offices on 27 February 2014, Eircom made a presentation on the how calls to non-geographic numbers are currently handled by a symmetric system (i.e., the current "deemed to be regime") for all Fixed-line operators and the possible implications of moving away from this regime.

BT also presented at this workshop. BT outlined why in their view the current symmetric system is not working and made particular reference to the fact that Mobile operators were not part of the symmetric system currently observed by Fixed-Line operators for certain number types e.g., 1800. BT indicated their wish to make changes to the arrangements that up to now have governed how the cost of routing such calls is dealt with at the wholesale level by fixed-line operators.

Copies of the presentations from BT and Eircom are available from ComReg to interested parties on request.

New charges have been published by BT on Eircom's Switched Transit Routing and Price List which are due to come into affect on 1 June 2014. A number of attendees expressed their concern regarding BT's proposal and requested that it be considered further. In particular, a number of participants requested that BT consider potential alternative proposals to address BT's specific concern that the current regime was not working.

A follow-up industry workshop was held on 13 March 2014. At this workshop BT made two proposals. The first proposal involves setting up a new number range to which, as ComReg understands, its retention charges would operate in a manner similar to the current 0818 range. BT highlighted a number of considerations in respect of this approach. The second proposal involved amending the current deemed to be regime for existing numbers such as 1800.

ComReg is, without prejudice to its regulatory powers, prepared to facilitate further discussions with a view to achieving an industry consensus that is also acceptable to ComReg. Both of BT's proposals require that Mobile operators are willing to enter into workshop discussions and will ultimately require an agreement by all parties (both fixed-line and mobile) to enter into a new regime.

ComReg notes that the creation of a new number range would require an amendment to the numbering conventions and would require Comreg to follow its statutory consultation process before making a final decision.

Before organising a further workshop ComReg believes that it would be useful to seek interested parties' views in advance. Accordingly, we are seeking the views of interested parties on the questions set out below. We hope to publish as much of the material received as possible and we plan to allow a period of cross consultation

whereby parties would have the opportunity to comment on such published responses. If ComReg is satisfied that a further workshop would be beneficial on foot of these responses we will facilitate such an event.

Questions

- 1) What are your views on the current regime for calls to non-geographic numbers? Please provide reasoning to support your views.
- 2) What are your views and experiences regarding the use by service providers/businesses of using non-geographic numbers such as 1800?
- 3) What do you consider the merits and difficulties are in respect of BT's proposal to a) move to a new number range; or b) reforming the current deemed to be regime? Please provide a detailed response which considers both proposals.
- 4) What are your views regarding the appropriateness of entering into a new deemed to be regime for either of BT's proposal i.e., either a single rate or more aligned deemed to be rate charged by Fixed-line and Mobile Operators for such calls? Please provide cogent reasoning to support your views.
- 5) Are you as a fixed-line and/or mobile operator willing to discuss the possibility of a new deemed to be regime which includes mobile-operators as part of that regime? If not, please state your reasons.
- 6) ComReg would welcome any additional views from interested parties regarding any additional issues or submissions you would like to make in respect of non-geographic numbering and the current wholesale charges thereof.

Submitting Comments

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

ComReg appreciates that the issues raised in this document may require respondents to provide confidential information if their comments are to be meaningful. However, we encourage respondents to structure responses in such a way as allow publication of as much material as possible in order to encourage an open and transparent debate.

As it is ComReg's policy to make all responses available on its website and for inspection generally, respondents are requested to clearly identify confidential material and place confidential material in a separate annex to their response. Alternatively, interested parties can submit an additional submission — labelled "public version" — to ComReg which has redacted the information you consider to be confidential. Such Information will be treated subject to the provisions of ComReg's guidelines on the treatment of confidential information as set out in ComReg Document No. 05/24.

All submissions should be clearly marked:- "Reference: Response to Call for Input, ComReg 14/23" and sent by post or e-mail to arrive on or before 5pm, 3 April 2014, to:

Mr. Kjeld Hartog

Commission for Communications Regulation

Block DEF

Abbey Court

Lower Abbey Street Freepost

Dublin 1

Email: kjeld.hartog@comreg.ie

Following receipt of submissions and publication on ComReg's website, ComReg proposes to allow an additional week post publication to allow interested parties to make cross-submissions, should they so wish, to the non-confidential responses received from interested parties.