August 2005

ETNO Expert Contribution on CEPT/ECC report 70 on Services based on HESC

Executive Summary:

ETNO provides operators' views to be taken into consideration concerning the CEPT/ECC report number 70 about services based on HESC. As this report is an essential complement to the draft Commission Decision on 116 for harmonised numbers for harmonised European services, it is ETNO's opinion that services definitions, service criteria and implementation scenarios should be considered with care.

ETNO recommends the ECC to make a number of improvements to the report, according to the comments as stated.

Introduction

ETNO represents the voice of 41 of Europe's largest, well established telecom operators in 34 countries and welcomes the opportunity to comment on the draft ECC report number 70 about services based on HESC. A number of remarks as stated in the "ETNO Common Position on the draft Commission Decision on reserving the number range beginning with 116 for harmonised numbers for harmonised European services"[1] also apply for CEPT/ECC report number 70.

For the successful implementation of HESC 116 a number of issues still need to be elaborated.

General comments

In ETNO's opinion clear service criteria and clear processes for assignment and administration for services with significant public interest should be in place. The decision making procedure on the assignment of numbers to

[1] See ETNO Position Papers, Common Position CP077 at www.etno.be – as of 1 September 2005

services should be transparent and subject to consultation with industry parties.

Services should have a European nature, which translates in a majority of countries who commit to implement these services.

In order to enhance user-friendliness for the customer, multistage dialling should be avoided.

Tariffing and accessibility should be subject to arrangements between operators and service providers; no further regulation is desirable concerning tariffing and accessibility. It should be treated as Business-as-usual.

The report concludes with seven questions that are intended to be answered. ETNO believes that some of the questions remain unanswered and as a consequence further work is required.

The document gives no clear answer to the question on the understanding of services with significant public interest. For example, the agreed criteria and understanding of common rationale, possible differences in national implementation, potential number exhaustion etc. are issues that need to be addressed in some manner. Any such final consideration of the proposals in the report should have the recognition in the report that they need to be agreed through clear and transparent consultation across industry, with all industry stakeholders, prior to any implementation.

Comments on the individual paragraphs

This section contains detailed comments on the paragraphs in CEPT/ECC report 70.

Ch 2:

Although it is mentioned in the first paragraph that 116 is in principle not diallable in international format, chapter 5.2 outlines that international dialling could be an option. International dialling will cause problems in a number of countries (e.g. +44 116 will end up in Leicester) and would lead to customer confusion. In that respect, it should be borne in mind that 116 is not a E.164 compliant number (cf Annex A.2.5, E.164)[2], but a short code: short codes should not be dialled in international format and should not be accessed by external networks

The report refers to the European common number range (+3883), the status of which has changed since the report was issued. ECC suspended the administration function and ERO has stopped the registrar activities. This is a result of a lack of interest in ETNS numbers and services.

[2] "*Numbers that only exist in the local, intraNetwork and/or national level are not considered international E.164-numbers*"

Ch 3.1:

As it is stated in the first paragraph, it could be possible to have a nation-specific service making use of a HESC 116 number. A clear definition of a European-wide service is needed; for instance a minimum number of countries must be defined, meaning a majority of countries considering a service as one of public interest and thus candidate for implementation of a 116-service

Card Stop is mentioned as candidate. In Germany the decision is already taken to use 116116 as general number for the blocking of Credit cards, Electronic signatures and SIM cards.. In other countries similar services are offered competitively. The development of the service criteria needs to ensure that such differences are accounted for and that no competitive advantage can be gained.

Ch 3.2:

The argument that 116 is part of E.164 is not correct, according to the E.164 definitions.

In the third bullet it is mentioned that access to ETNS handling is mandatory, but according to the Universal Service Directive (USD) the mandatory requirement is to handle calls made to the ETNS. The (USD) (Article 27.2) states that "Member States shall ensure that all undertakings that operate public telephone networks handle all calls to the European telephony numbering space, without prejudice to the need for an undertaking that operates a public telephone network to recover the cost of the conveyance of calls on its network".

The USD also states that "Member States shall ensure that end-users from other Member States are able to access non-geographic numbers within their territory where technically and economically feasible". This makes it important to clarify the resource being discussed.

Ch 4.2.1:

In the characteristics of non-commercial services one essential is missing: Recognised and proven public demand.

Ch 4.2.2:

A number of criteria depend on the type of the service, e.g. Basic fee, then fixed price; Available around the clock; Free to the caller. These service type dependent criteria relate to service offering and should not be used as general criteria for selection of 116 services, which is still to be developed.

Implementation should be carried out by countries on the basis of recognisable and agreed common service characteristics.

Ch 4.2.3:

Some services as mentioned in the list of examples of non-commercial services are in some countries subject to competition and commercial considerations. It should be borne in mind that countries use different definitions of commercial and non-commercial services – which can also evolve over time. Such evolution needs to be accounted for in both criteria and management processes. This notion also applies for the list of commercial services in chapter 4.3.3. Examples of this effect are Social security office and Employment office.

Ch 5.2.3:

The feasibility of international dialling should be investigated further, assuming that the numbering resource 116 should be considered for services of significant public interest. Candidates for possible problems are potentially all area codes equal to 116, all area codes starting with 11 and subscriber numbers starting with 6 and finally all area codes starting with 1 and subscriber numbers starting with 16. This gives for Europe the following potential problems:

116 Area code:
United Kingdom – Leicester,

11 area codes:
Belgium – Hasselt
Sweden – Norrkoping

1 area codes:
France – Paris

These are only examples and should be investigated further to cover all European countries. In such a study also the future national development of the numbering plan should be considered.

Apart from this issue, the short number length of the 116 number can give problems in international switches.

Nevertheless, when 116 is used as a short code it is barred from international dialling by definition.

Ch 5.3:

Regarding multistage dialling it should be borne in mind that dialogues can be experienced by the customer as tedious and could discourage the use of the services.

One advantage for multistage dialling that is not mentioned in the list, is the smaller list for number exhaustion.

In the list of disadvantages the question of how to determine interconnection charges is asked. This is certainly not to be considered as a

disadvantage and is determined on the basis of normal bilateral arrangements between operators and service providers (business as usual).

Ch 5.4:

The implementation of HESC 116 services differs a lot from the 112 implementations. 112 is normally implemented with complex additional functionality, like location information and location based routing.

Conclusion

As a number of issues still exist to be solved and clarification is needed on a number of aspects. ETNO finds the CEPT/ECC report nr 70 needs further elaboration on these points and the Association is prepared to further discuss with PT HESC on this matter.