

## Expert Contribution to the CEPT / NNA / HESC Workshop on 116 implementation

### Executive Summary

This Expert Contribution (EC) presents a number of points of view to be used by ETNO representatives at the CEPT HESC workshop on 116xxx implementation. The EC addresses both the HESC presentation material that has been circulated and the still outstanding issues that the ETNO NANI WG identified on earlier occasions.

### Introduction

This paper presents ETNO views on a number of issues that are to be discussed during the CEPT / NNA / HESC organised workshop on 19 September 2007 in Copenhagen.

### Issues

#### Highlight /Issue 1:

The main focus of the presentation material relates to charging and funding options. The intent is that calls to HESCs are free for all callers but this may not be possible from mobile phones, and as a consequence alternative methods have been identified. These alternate methods include

1. All calls to HESC should be free until a level of traffic determines otherwise
2. Each operator would bear its own costs, bundling it within other similar services that it provides
3. Adding a specific supplement to the bill
4. Sponsors could pay the call charges under normal freephone arrangements

#### Way forward:

ETNO has stated that the treatment of calls to HESCs should be business as usual. In that respect call charges will be levied to the recipient of the call, *independently of whether the HESC approach is for set-up costs or for call traffic charges*. Costs should equally be applied for the implementation of HESCs. Therefore ETNO would support:

- An amendment to option 4 above that includes a spoken announcement on mobile originated calls that they are not free, or if they are then the charges are passed as per normal.
- Restating the principle that operators must be free to be able to recover their costs, and that the manner in which they establish service related to HESCs should be Business As Usual (BAU).

**Highlight /Issue 2:**

As part of the debate on charging and funding options, assumptions are made regarding networks and costs. The assumptions are that:

- costs of core networks are reducing rapidly
- the costs of calls have reduced substantially
- the marginal cost of handling calls to HESCs is likely to be zero.

These assumptions are almost irrelevant, and seek to confuse the issue with regard to implementing HESCs. Not all HESC services will be of as much social importance as missing children – they can be for business travellers. The costs identified by the assumptions do not take account of the implementation of the codes, including data builds. The costs are certainly not trivial enough to justify giving the call for free (to all parties). Irrespective of the cost level, the Commission decision fully allows the operators to recover their costs.

The aspect of cost recovery in the EC decision is directly linked with a freephone model. In this way there is no room to discuss other funding mechanisms. See whereas point 3: “In order to reflect the social function of the services in question, the harmonised numbers should be freephone numbers, without this meaning that operators would be obliged to carry calls to 116 numbers at their own expense. The freephone nature of the numbers is therefore an essential component of the harmonisation being carried out.

**Way forward:**

To reinforce the BAU approach. Irrespective of the social nature of the service, the cost of the calls has to be recovered. In some national environments this is a regulatory requirement.

**Highlight /Issue 3:**

The presentation recognises that the use of HESCs is intended for visitors and that such visitors will tend to use mobiles, and then goes on to use this as the assumption to suggest that calls be allowed to be routed beyond the national border as standard procedure. It is suggested that this has not been considered as an issue.

**Way forward:**

This is incorrect, as the issue has been discussed, and all calls should originate and terminate nationally, irrespective of whether or not the consumer has roamed. The EC decision states that “*It is desirable for citizens of the Member States, including travellers and disabled users, to be able to reach certain services that have a social value by using the same recognisable numbers in all Member States*”. The implication that some services such as “Card Stop” services would be best served with a subsequent “shared backbone” is both a commercial and implementation issue. It is beyond the remit of the

regulators group. Indeed it has been suggested that offering such services as Card Stop as a HESC does not account for those consumers who wish to make such a call outside of the region, and will require an additional number, such as +800 (international Freephone). It would be easier, and simpler to make all services that will operate outside Europe have the one number to remember.

**Highlight /Issue 4:** Of the outstanding issues, that of deciding which operator has an obligation to offer a terminating service for 116 is a cause for concern. There is no obligation on operators to terminate these services, undermining as it does the BAU approach. This proposal demonstrates the confusion that surrounds the concept of HESCs and their implementation.

**Way forward:** There is no pre-existing market involved, and implementation will in any event see the need for bi-lateral negotiations to occur between operators to determine the interconnect charges. The principle of BAU should be the basis of the response, and should be involved in the assignment of the number nationally, to the CP of the HESC provider, in order to reinforce the principle.

If there is no guarantee for operators to recover costs, what will be the impact for the HESC service providers in getting an operator willing to implement the service (service similar to 0800; service offered by terminating operator to 0800 customer)? Is there any obligation for operators to make an offer to HESC service providers? A BAU environment gives more guarantees for HESC service providers to be served on the market by the operators.

**Highlight /Issue 5:** There are two other issues (carrier pre-selection (CPS) and permitting SMS Calls) identified, as well as a number of others that have not been identified, including language, portability, and on-going management such as when the HESC provider fails.

**Way forward:** The general approach to these issues would be to state that:

- for CPS the calls would be treated as calls are currently treated in the national environment for freephone under CPS
- SMS is a HESC provider issue
- To raise language, portability and on-going management as additional issues which have not been identified so far.

**Highlight /Issue 6:** A proposal has been made that all calls to 116 are carried free, to both the calling and called parties. This has significant implications in terms of the demand for these codes, and the existing use of other numbering resources. ETNO has stated that it believes in the principle of recovering costs, and allows the operator to determine which charity/helpline it wants to support through its CSR department. Additional issues to be considered are that:

- such charities have well established codes, and clarification should be sought as to how 116 codes might exist alongside, including an assessment of the negative impact that might occur from introducing an alternative number and the confusion that might accrue.

- the on-going activity in the ITU with Child Helpline International (CHI) seeking the same national code in every country, and the possible negative impact that this might have on 116 and existing numbers.

**Way forward:**

The principle that the costs incurred by the operator should be recovered should remain central in order to allow CSR departments to judge on, what ever criteria they see fit, which charities to support. The consequence of this is to raise the issue of the impact of diluting the message associated with existing numbers with regard to 116, and to suggest that there is a Europe wide approach in the ITU that if there is to be a national number available globally that, for Europe, it is 116 111.

**NB:** CHI has applied for, and had reserved 116 111 at the European level.

**Highlight/Issue 7:**

In addition to the above issues, the following are ones that have yet to be addressed:

- Language
- Costs associated with implementing a potential 1000 numbers, including databuild, OSS,
- Payphones
- Commercial arrangements between operators
- To whom are the 116XXX numbers allocated (SPs? Operators? from within the country, outside of the country?)
- Will there be a mandate of opening access to individual services?
- How will subsequent applications for the same number be handled after a first application has already been approved to open a service on that number?
- Does Number Portability apply to these calls?
- Does Carrier Pre-Selection apply to these calls?

**Proposal**

These views will form the basis of ETNO's contribution to the forthcoming CEPT / NNA / HESC workshop, and equally are an aide memoire to ensure that the remaining points of attention previously identified by the ETNO NANI WG will be addressed.