

Expert Contribution on issues relating to numbering resources used for Services of Social Importance



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Executive Summary

- ETNO welcomes the opportunity to contribute to the further EC debate with regard to Services of Social Importance.
- The current reservation mechanism is appropriate to support the development of consumer awareness of 116 for Services of Social Importance.
- As other related services emerge, ETNO believes that existing global numbering resources, that minimise the impact upon current national numbering schemes, and that meet the requirements of the applicant, are more appropriate.

Introduction

ETNO has previously made contributions on the appropriate use of global numbers for services such as “card stop”. In making such contributions and prior to the development of Harmonised European Short Codes for Services of Social Importance, ETNO had advised the appropriateness of global numbering resources to be used by customers. The use of such services offered a more ubiquitous access than that offered by national only dialling 116 codes.

ETNO reviewed the proposal expressed in CoCom 09-09 on European Traffic and Traveller Information Number (ETTIN) and, based upon previous contributions, has identified a number of areas that require clarification.

Issues

Cost Recovery Model

In making the reference to Cost Recovery Model, it is not clear to which actor/entity in the provision of the service this would apply. Any service that Communication Providers implement should be based on commercial terms. Such an approach ensures a fair and equitable implementation of services. If it is to be applied to the Service Provider, then the implication of using a Cost Recovery Model requires further explanation.

Alternative Numbering Proposals

Considering that the EC has identified services of social importance that can not be met with the current freephone model, the issue of alternative numbering resources will eventually need to be decided. ETNO is conscious of the challenge that was experienced in identifying 116 as a free resource, and recall that in fact whilst it was not readily available in all Member States; it was the one choice that had the least negative impact. There was (and still remains) the requirement to ensure that consumers understand the nature of 116 short codes. To utilise 116 in a manner other than that laid down in the European Decision may lead to confusion as to the nature of the service being offered, and the conditions associated with the numbering range. The result would be a greater barrier to the uptake of services provided utilising such numbers. Use of other resources such as +800 or similar global resources might mitigate such a perceived barrier and should be investigated.

Implementation

The benefit of the current rules, as outlined in the European Decision, addressed certain service requirements. Service provider's that have an interest in providing offerings that require different pricing models than the freephone model can do so using existing commercial and numbering options. This approach should be the basis for ETTIN.

Stakeholder Engagement

In seeking to discuss the implementation of ETTIN, noting that the current operating and commercial model of HESC would appear unsatisfactory, ETNO welcomes the approach put forward by ECC NN&A WG, of engaging with all stakeholders. The success of such an approach for 116 is one that should be carried forward into the debates, and ETNO is ready to participate in, and contribute to, such debates.

Conclusion

Identification of a numbering resource to support the as yet unspecified Cost Recovery Model is a critical element to ensure the success of the implementation for services such as ETTIN. The implementation should remain apart from the 116

numbering resource as defined in the Commission Decision of February 15th 2007 (L49/30) to ensure that the customers fully understand the conditions associated with the numbering range. An alternative, global numbering resource could be considered as more appropriate to the customers of service that require “payment or payment commitment”. It is to the ITU-TSB that requests could be made for such numbering resources and which, in addition to meeting the above requirements, could avoid unnecessary national numbering plan changes to existing national implementations. This will avoid additional costs, and barriers to the timely implementation, based on customer’s previous knowledge of a service or the current understanding that is being developed with HESC.