



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Review of Extended Operation of Health Service Executive 1850/1890 Non-Geographic Numbers

Response to Consultation 21/75 and Decision

Response to Consultation and
Decision

Reference: ComReg 21/89 and D07/21

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Additional Information

Consultation	21/75
Response to Consultation 21/75 and Decision	21/89
Submissions to Consultation 21/75	21/89s

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1 Introduction

- 1 The Commission for Communications Regulation (“ComReg”) is responsible for regulating the electronic communications sector in the State, in accordance with European Union (“EU”) and Irish law. This includes managing the national numbering resource which is essential to all telecommunications and thus underpins many key economic and social activities. In exercising its number management function ComReg must ensure, amongst other things, that numbers are used efficiently and effectively in a manner that protects consumers and promotes competition.
- 2 In March 2021, ComReg, pursuant to its number management function commenced a public consultation (“Consultation 21/28”)¹ on a review of the Numbering Conditions of Use and Application Process document (“Numbering Conditions”). The purpose of this review was to address any issues that had arisen since the last update in 2019, by proposing new or amended conditions of use, and also to make any necessary administrative amendments, as appropriate. The issues addressed in Consultation 21/28 were related to three main areas, namely the transposition of the European Electronic Communications Code (“EECC”)², the Implementation of the Non-Geographic Number (“NGN”) platform and Market and Technology Developments.
- 3 ComReg’s Response to Consultation 21/75³ describes the submissions to Consultation 21/28 and sets out ComReg’s assessment of same, its final positions, and its final decisions.
- 4 With regard to the implementation of the NGN platform, ComReg highlighted in Section 3.1 of the consultation, its NGN decision of December 2018⁴ to withdraw 1850, 1890 and 076 NGNs. The key relevant part of this decision, amended in response to Consultation 21/28, is as follows:

“Save for any exceptional circumstances as ComReg shall determine, all rights of use for Non-Geographic Numbers in the ranges 1850, 1890, and 076 shall be withdrawn from all undertakings to whom such rights of use were granted at midnight on 31 December 2021 and from the date of this decision no new rights of use for Non-Geographic Numbers in the ranges 1850, 1890, and 076 shall be granted to any undertaking. All rights of use for Non-Geographic Numbers in the ranges 1800 and 0818 shall remain in effect

¹ [Consultation 21/28](#) – Review of the Numbering Conditions of Use and Application Process

² [Directive \(EU\) 2018/1972](#) OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 December 2018 establishing the European Electronic Communications Code

³ [ComReg 21/75](#)– Review of the Numbering Conditions of Use and Application Process – Response to Consultation 21/28, Decision (D06/21) and Further Consultation

⁴ [D15/18 and ComReg 18/106](#) - Review of Non-Geographic Numbers Response to Consultation 18/65 and Decision

and new rights of use for numbers in those ranges may be granted to any authorised undertaking which applies for same”.

- 5 In the case of a request from utility operators for extended operation of six identified 1850/1890 emergency contact NGNs, ComReg set out its preliminary position in Consultation 21/28 and, based on an assessment of consultation responses received and of the request against the set of criteria agreed with Industry, decided to permit extended operation as requested.
- 6 In its submission to Consultation 21/28, the Health Service Executive (“HSE”) requested that some of the NGNs it uses to deliver certain services be provided with a two-year extension (“the HSE Request”), similar to that proposed for utility providers⁵. In response, and following its assessment of the request, while also noting the importance of providing operators with sufficient notice of its final Decision on the HSE Request, ComReg decided to commence a further consultation (“Consultation 21/75”) on this single numbering issue.
- 7 ComReg set the deadline for receipt of submissions to Consultation 21/75 of 5pm on 16 August 2021 and indicated that it planned to publish a response to consultation together with its final Decision in relation to this specific matter by the end of September 2021.
- 8 There were three respondents to Consultation 21/75 as follows:
 - Health Service Executive (“HSE”)
 - Three Ireland (Hutchison) Limited (“Three”)
 - Vodafone Ireland Limited (“Vodafone”)
- 9 The non-confidential submissions are published⁶ alongside this Document and considered herein.
- 10 ComReg, having carefully considered the submissions to Consultation 21/75, has decided to make amendments to Decision 15/18⁷.

⁵ ComReg has adopted the proposal to extend the operation of the utility emergency contact numbers until 30 November 2023 (“the Extended Period”).

⁶ ComReg Document 21/89s – Submissions to Consultation 21/75.

⁷ For relevant legal framework and statutory objectives, please see Appendix 10 “Number Management – legal framework and statutory objectives” in Numbering Conditions of Use and Application Process, ComReg Document 15/136R3.

2 Extended operation of certain HSE NGNs

Summary of ComReg's view in Document 21/75

- 11 The HSE requested that some of the NGNs it uses to deliver certain services be provided a two-year extension similar to that provided to utility operators' emergency contact numbers ("HSE Request"). ComReg noted that this request merited consideration given the onset of Covid-19 in the period since Decision 15/18 and the role the HSE has played in the delivery of health services during same.
- 12 In particular, ComReg also noted that an exceptional circumstance was likely created by among other things, the fact that "*the vaccination programme against Covid-19 is being implemented by the HSE on behalf of the State*"⁸ and this designation by the State is unlikely to be relevant to other service providers.
- 13 With that in mind, ComReg noted that three broad options were available to it as follows.
 - **Option 1** - Include only Covid-19 related NGNs in the Extended Period;
 - **Option 2** - Include all HSE Numbers in the Extended Period; or
 - **Option 3** - Include the most relevant HSE Numbers in the Extended Period.
- 14 ComReg considered that Option 1 would not be sufficient to appropriately deal with the issues that could arise in the management of the pandemic because it is difficult to separate the services provided in relation to the management of Covid-19 and the associated vaccination programme from other essential and interrelated services provided by the HSE at the same time. ComReg was therefore of the preliminary view that it was appropriate to include HSE numbers other than the Covid Helplines in the Extended Period.
- 15 In relation to Option 2 and Option 3, the HSE has approximately 90 NGNs and ComReg was conscious that the inclusion of additional numbers would be an imposition on operators and increased the risk of call/traffic routing errors and/or calls not being connected.
- 16 With that in mind, ComReg indicated that it had engaged with the HSE with a view to identifying numbers that involve the delivery of important emergency and patient services. In that regard, ComReg noted that the HSE had identified up to 30 NGNs

⁸ For example, see S.I. No. 193 of 2021 Health Act 1947 (Section 31A - Temporary Restrictions) (Covid-19) (Amendment) (No. 2) Regulations 2021, and S.I. No. 168/2021 - Health Act 1947 (Section 31A - Temporary Restrictions) (Covid-19) Regulations 2021, and succeeding legal instruments.

that it considered were needed to ensure effective delivery of services and a final list of numbers was unlikely to be in excess of 30 NGNs in total.

17 Therefore, ComReg's preliminary view was Option 3 was preferred over Option 2 and it was appropriate to include up to 30 NGNs in the Extended Period, noting that the final number of NGNs could be less than 30 but is unlikely to be more. Finally, ComReg noted that there was no expectation that a period of extension beyond 2 years would be required and reliance on legacy HSE numbers should decline over the duration of the Extended Period.

18 In Consultation 21/75, ComReg asked the following question:

Q.10 Do you agree with the proposal to extend the operation of up to 30 NGNs in use by the HSE to 30 November 2023? Please explain the basis for your response in full and provide supporting information.

Views of respondents to Consultation 21/75

19 ComReg received responses from the HSE, Vodafone and Three who were all broadly supportive of ComReg's proposals.

HSE

20 The HSE notes that it has over 130 NGNs in use and it has been considering the migration of these numbers to the 1800/0818 ranges. With that in mind, it has identified 16 NGNs (1850/1890) which it would have difficulty migrating before the deadline of 31 December 2021.

21 In this regard, the HSE submits a request that these 16 NGNs (1850/1890) should be permitted to continue operation for the Extended Period. In support of its request, the HSE provides details of the use of each of these NGNs and the reasons for such a request. Further details of the HSE's use of these phone lines, which includes a variety of emergency and patient services, are provided in ComReg Document 21/89s⁹ and a summary is provided in Annex 2.

22 The HSE also notes that should these numbers be included, it will not seek any further extension beyond the Extended Period (30 November 2023).

Three

23 Three broadly agrees with ComReg's preliminary views but notes the following.

⁹ ComReg 21/89s - Non-Confidential submissions to Consultation 21/75

- ComReg needs to be careful in its approach to creating “exceptions” (i.e. NGNs that will be allowed operate for an Extended Period). Three proposes that the extended operation of the utility emergency contact numbers has been considered and agreed with industry noting that each number in the exceptions list was assessed against an agreed set of criteria which are documented and should also apply to the HSE Request.
- ComReg should be cognisant that other organisations may also seek to extend the operation of their own numbers, perhaps on account of difficulties encountered because of Covid-19. Three maintains that a consistent and objective approach will need to be taken to any such requests. In this regard, Three recommends that “*ComReg quickly modifies its criteria and individually considers each number that is to be extended against the new criteria*”.
- Network operators are now building their “exceptions” list, so it is critical that industry has certainty on the numbers that are to be included as soon as possible. Three notes that ComReg is working to deliver the final list of NGNs for extended operation by the end of September 2021, but requests that this should be delivered earlier if possible.

Vodafone

- 24 Vodafone agrees with ComReg’s preliminary view and recognises the need in particular for industry to support the HSE vaccination work at this time. Nevertheless, Vodafone requests that the final list of NGNs for extended operation be determined as soon as possible.
- 25 Vodafone agrees with ComReg’s preliminary view while highlighting the difficulty in implementing “bespoke” solutions for small quantities of numbers. Vodafone also refers to the added difficulty of implementing changes in the period just before Christmas.

ComReg’s Assessment

- 26 ComReg notes respondents’ widespread support for Option 3 and the inclusion of HSE NGNs in the Extended Period.
- 27 In relation to the HSE’s Request and the additional information provided by it in response to Document 21/75, ComReg notes the following.
- **First**, the HSE has identified 16 NGNs (1850/1890) which it would have difficulty migrating before the deadline of 31 December 2021. ComReg notes that all numbers relate to emergency and patient services, including emergency departments, community health services, screening services and other health services referred to in Document 21/75.

- ComReg accepts the concerns put forward by the HSE¹⁰ supporting the extension of use of this limited set of numbers. ComReg is satisfied that the migration of these numbers by the end of the year would create a disproportionate burden on the HSE.
- **Second**, the number of NGNs requested by the HSE is substantially less than the envisaged 30 NGNs and this should reduce the imposition on operators while also reducing the risk of misrouting and/or calls not being connected. Indeed, ComReg notes that the identification of 16 NGNs relative to the 130+ NGNs currently used by the HSE (and due for expiry 31 December 2021) demonstrates the exceptional nature of the HSE Request.
- **Third**, the finalisation of these numbers at the time of this Decision (i.e. before end of September as referred to by Three) will also provide operators sufficient time with which to prepare for the retention of these numbers beyond 31 December 2021.
- **Fourth**, ComReg notes the HSE's acceptance that the duration of the extension would be binding, and no further extensions would be sought for these NGNs in the future given the temporal nature of the case made by HSE. ComReg is therefore satisfied that a period of two years would provide the HSE with sufficient time to migrate the remaining 16 NGNs without compromising the provision of important health services.

28 In relation to Three's concern that other organisations could seek extensions due to issues arising from Covid-19, ComReg notes paragraph 229 of Document 21/75 where ComReg stated that:

“such exceptional circumstances and the designation of the HSE by the State is unlikely to be relevant to other service providers, and any addition of the HSE to the Extended Period (which already includes utility providers) would apply to the HSE only”.

¹⁰ These concerns (See HSE Response in Document 21/89s) include:

- time to distribute a new number to relevant parties,
- time constraints caused by Covid and cyber-attacks,
- reprinting and issuing of new guidance, and
- increased service requirement over winter and new year.

ComReg is of the view that in the normal course of events the 3-year period provided by ComReg would have been sufficient for the HSE to migrate these services. However, as previously noted, the Covid - 19 pandemic and the designation placed on the HSE by the State clearly establishes an exceptional circumstance.

- 29 The exceptional circumstance arising from the HSE Request primarily relates to the designation by the State of the HSE as the body implementing the vaccination programme on its behalf¹¹. This has created an additional burden on HSE. Furthermore, there are clear and practical difficulties in attempting to separate the services provided in relation to the management of Covid-19 and its associated vaccination programme from other essential and interrelated services provided by the HSE. ComReg is not aware of any similar designation provided by the State in response to the Covid-19 pandemic.
- 30 ComReg maintains that the existing criteria used in respect of utility operators remains appropriate and no further consideration of additional criteria for other potential service providers (as requested by Three) is necessary.
- 31 Therefore, ComReg's final position is to extend the HSE NGNs provided in Annex 2 for a period of not more than two years.

¹¹ See Paragraph 12

Annex: 1 Decision Instrument

Decision

Part I – Definitions

Terms used in this Decision have the same meaning as set out in any of the following, as applicable: the European Communities (Electronic Communications, Networks and Services) (Framework) Regulations 2011 (S.I. No. 333 of 2011) (“Framework Regulations”); the European Communities (Electronic Communications, Networks and Services) (Authorisation) Regulations 2011 (S.I. No. 335 of 2011) (“Authorisation Regulations”); the Communications Regulation Acts 2002 to 2019 (“the 2002 Act”); the third version of the “Numbering Conditions of Use and Application Process” (ComReg 15/136R2); and Commission Document 21/75 of which this Decision forms part.

Part 2 – Statutory Remit

The statutory functions, objectives, duties and powers of the Commission for Communications Regulation (“the Commission”) in relation to its management of the national numbering resource are set out in the 2002 Act and in the Common Regulatory Framework (including Directive 2002/21/EC as amended, and Directive 2002/20/EC as amended, and as respectively transposed into Irish law by the Framework Regulations and by the Authorisation Regulations)¹². These functions, objectives, duties and powers of the Commission are set out in greater detail in Appendix 10 of ComReg Document 15/136R3.

Part 3 – The Decision

The Commission,

- (a) pursuant to its function under section 10(1)(b) of the 2002 Act to manage the national numbering resource and its objectives in the exercise of that function as set out in section 12 of the 2002 Act and as set out in Regulation 16(1) of the Framework Regulations;
- (b) having regard to its duty under Regulation 16(2) of the Framework Regulations to apply objective, transparent, non-discriminatory and proportionate regulatory principles in pursuit of its statutory objectives;
- (c) having conducted a consultation (Commission Document 21/75) and having considered all responses received on foot of that consultation;

¹² To note that the Common Regulatory Framework has been repealed by the European Electronic Communications Code (Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code) (“the EECC”). The EECC, which came into force on 21 December 2020, has not yet been transposed in this jurisdiction. The numbering provisions in the EECC, namely Articles 93 to 97, are for the most part identical to the numbering provisions in the existing Common Regulatory Framework.

- (d) for the reasons set out in its written response to Commission Document 21/75 to which this Decision is attached; and
- (e) in exercise of its powers under Regulations 8(1), 13(2), 14(1) and 15(1) of the Authorisation Regulations and Parts A and C of the Schedule thereto,

hereby makes the following decision:

Decision D15/18, set out at Annex 1 of Commission Document 18/106 (“Review of Non-Geographic Numbers – Response to Consultation 18/65 and Decision”), shall be amended as and from 9 September 2021 as now set out:

(a) Part III of the NGN Decision D 15/18 is amended by the addition of the following new Section (v) which provides as follows:

“(v) The following numbers assigned to the Health Service Executive shall be permitted to remain in operation until 30 November 2023:

Phone Number
1850 777911
1850 224477
1850 302702
1850 400911
1890 100016
1850 211869
1890 499299
1890 252919
1890 252920
1890 252929
1850 444925
1850 241850
1850 636313
1850 420420
1890 424555
1850 200776

Part 4 – Effective Date

The amendments to Decision D15/18, reflecting the decisions above, shall come into effect on 9 September 2021.

Signed

Robert Mourik

Commissioner

Commission for Communications Regulation

Annex: 2 HSE NGNs for Extended Operation

NGN NUMBER	SERVICE NAME	SERVICE DESCRIPTION
1850777911	NEDoc	Emergency Out Of Hours Medical Service
1850224477	D-Doc/ North Doc (company that provides GP)	Emergency Out Of Hours Medical Service
1850302702	MIDOC	Emergency Out Of Hours Medical Service
1850400911	Now Doc	Emergency Out Of Hours Medical Service
1890100016	HSE Organ Donation Line	HSE Organ Donation Number
1850211869	Aero Medical Despatch- National Ambulance Service	Emergency Ambulance Air Service
1890499299	Patient Transport Service	Regional and Non-Emergency Patient Transport Service
1890252919	National Medical Card Support Line	Patient Medical Card Line
1890252920	General Practitioner Medical Card Support Line	GP Medical Card Line
1890252929	Medical Card Support	Medical Card Line
1850444925	HR Helpdesk Support Line	HSE National HR Helpline
1850241850	HSE Live	HSE Live Support number for vaccinations and health services
1850636313	HSE Live	HSE Live Support number for vaccinations and health services
1850420420	HSE Covid-19 Helpline for Health Care Workers	HSE Covid Support line for staff-to provide support and information in relation to Covid -19 queries for healthcare workers. Health and Safety, Employment Assistance.
1890424555	HSE Your Service Your Say	General Public Feedback line
1850200776	HSE Appliance Recycling, Repair and Service	HSE cleaning and repair service for all HSE equipment- for patients at home

Annex: 3 Informal consolidated version of the NGN Decision

For the convenience of stakeholders, please find below an informal consolidated version of Decision D15/18 (the NGN Decision)¹³, as amended by Decision D06/21, contained in Response to Consultation 21/75¹⁴, and Decision D07/21, contained in Response to Consultation 21/89¹⁵. Amendments are in bold. Readers should note that the updated reference for the Numbering Conditions of Use and Application Process document is now to Commission Document No. 15/136R3.

While every care has been taken in the preparation of this informal consolidated version of the NGN Decision, ComReg can assume no responsibility for and give no guarantees, undertakings or warranties concerning the accuracy, completeness or up to date nature of the information provided and does not accept any liability whatsoever arising from any errors or omissions.

Decision in respect of Non-Geographic Numbers (“NGNs”)

PART I – DEFINITIONS

Terms used in this Decision have the same meanings as set out in any of the following, as applicable: European Communities (Electronic Communications Networks and Services) (Framework) Regulations 2011 (S.I. No. 333 of 2011) (“Framework Regulations”); European Communities (Electronic Communications Networks and Services) (Authorisation) Regulations 2011 (S.I. No. 335 of 2011) (“Authorisation Regulations”); Communications Regulation Act 2002 to 2017 (No. 20 of 2002) (“2002 Act”); the second edition of the “Numbering Conditions of Use and Application Process” (Commission Document No. 15/136R1)¹⁶; and Commission Document No. 18/106 of which this Decision forms part.

PART II – STATUTORY REMIT

¹³ As contained in Response to Consultation 18/106, Review of Non-Geographic Numbers, Response to Consultation 18/65 and Decision, 3 December 2018.

¹⁴ Review of the Numbering Conditions of Use and Application Process, Response to Consultation 21/18, Decision and Further Consultation.

¹⁵ Review of Extended Operation of Health Service Executive 1850/1890 Non-Geographic Numbers, Response to Consultation 21/75 and Decision.

¹⁶ Readers should note that the updated reference for the Numbering Conditions of Use and Application Process document is now to Commission Document No. 15/136R3.

The statutory functions, objectives, duties, and powers of the Commission for Communications Regulation (“the Commission”) in relation to its management of the national numbering resource are set out in the Common Regulatory Framework (including Framework Directive 2002/21/EC as amended and Authorisation Directive 2002/20/EC as amended and as respectively transposed into Irish law by the corresponding Framework Regulations and Authorisation Regulations). These functions, objectives, duties, and powers of the Commission are set out in greater detail in Annex 8 of Commission Document No. 15/136R1.

PART III - THE DECISION

The Commission:

- pursuant to its function under section 10(1)(b) of the 2002 Act to manage the national numbering resource and its objectives in the exercise of that function as set out in section 12 of the 2002 Act and in regulation 16(1) of the Framework Regulations (as described in greater detail in Annex 10 of Commission Document No. 15/136R1, as amended¹⁷);
- having regard to its duty under regulation 16(2) of the Framework Regulations to apply objective, transparent, non-discriminatory and proportionate regulatory principles in pursuit of its statutory objectives;
- having considered all relevant material before it including the “Consumer Study” and “Organisation Study” conducted by Behaviour & Attitudes Ltd, the market research, data gathering, modelling and analyses carried out by DotEcon Ltd, and data collected from the “Voluntary Information Requests” and the “Section 13D Information Requirements” (within the meanings of those various terms as set out in Commission Documents No. 17/70 and 18/65);
- having conducted two public consultations (Commission Documents No. 17/70 and 18/65) and having considered all responses received on foot of both consultations;
- for the reasons set out in its written response to Commission Document No. 18/106 to which this Decision is attached; and
- in exercise of its powers under regulations 8(1), 13(2), 14(1), and 15(1) of the Authorisation Regulations and Parts A and C of the Schedule thereto

hereby makes the following decisions:

¹⁷ Readers should note that the updated reference for the Numbering Conditions of Use and Application Process document is now Commission Document No. 15/136R3.

(i). The “Numbering Conditions of Use and Application Process” (currently Commission Document No. 15/136R1) shall be amended as and from 1 December 2019 by the inclusion of the following text therein which shall constitute a condition attaching to the General Authorisation:

“Geo-linking Non-Geographic Numbers with Geographic Numbers -

The retail tariff charged to any end-user for a call to a Non-Geographic Number in any of the four ranges 1850, 1890, 0818, or 076 shall not exceed the retail tariff that would be charged to the same end-user for a national call made to a Geographic Number, at the same time.

For example, and for the avoidance of doubt, the above condition shall include the following scenarios:

If an end-user’s contract for the receipt of fixed or mobile service provides that all calls to Geographic Numbers shall be included in a “bundle” of call minutes, of a specified amount and covering a specified time period, then all calls made by that same end-user to a Non-Geographic Number in any of the four ranges 1850, 1890, 0818, or 076 shall also be included within the same “bundle” of call minutes, up to the same specified amount and covering the same specified time period.

Where an end-user exceeds his or her allocation of “in-bundle” call minutes, the retail tariff charged to that end-user for any “out-of-bundle” call made to a Non-Geographic Number in any of the four ranges 1850, 1890, 0818, or 076 shall not exceed the retail tariff that would be charged to that same end-user for any “out-of-bundle” national call made to any Geographic Number at the same time.”

(ii). **Save** for any exceptional circumstances as ComReg shall determine, all rights of use for Non-Geographic Numbers in the ranges 1850, 1890, and 076 shall be withdrawn from all undertakings to whom such rights of use were granted at midnight on 31 December 2021 and from the date of this decision no new rights of use for Non-Geographic Numbers in the ranges 1850, 1890, and 076 shall be granted to any undertaking. All rights of use for Non-Geographic Numbers in the ranges 1800 and 0818 shall remain in effect and new rights of use for numbers in those ranges may be granted to any authorised undertaking which applies for same. **Recorded announcements shall play for callers to 1850, 1890 or 076 numbers from midnight on 31 December 2021 until midnight on 9 January 2023.**

“(iii) The following numbers assigned to certain utility companies (as identified in the table below) shall be permitted to remain in operation until 30 November 2023:

Utility company the number is assigned to	Emergency contact number concerned
ESB Networks (ESBN)	1850 372 999
Gas Networks Ireland (GNI)	1850 20 50 50 1850 42 77 47 1850 211 615
Irish Water (IW)	1850 278 278 1890 278 278”

(iv) Operators shall ensure the parallel running of 076 and 089 numbers for Public Protection and Disaster Relief (PPDR) services from 31 October 2021 until 31 December 2021.”

“(v) The following numbers assigned to the Health Service Executive shall be permitted to remain in operation until 30 November 2023:

Phone Number
1850 777911
1850 224477
1850 302702
1850 400911
1890 100016
1850 211869
1890 499299
1890 252919
1890 252920
1890 252929
1850 444925
1850 241850
1850 636313
1850 420420
1890 424555
1850 200776

PART IV. EFFECTIVE DATE

A revised version of the “Numbering Conditions of Use and Application Process” (currently Commission Document No. 15/136R1)¹⁸ reflecting Decisions (i) and (ii) above shall come into effect on 1 December 2019.

Signed:

Jeremy Godfrey

Commissioner

The Commission for Communications Regulation

Dated this 30th day of November 2018

¹⁸ Readers should note that the updated reference for the Numbering Conditions of Use and Application Process document is now Commission Document No. 15/136R3.

