



An Coimisiún um  
**Rialáil Cumarsáide**  
Commission for  
**Communications Regulation**

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

## **Non-Confidential Submissions to Consultation 21/75**

### **Submissions to Consultation**

**Reference:** ComReg 21/89s

**Version:** Final

**Date:** 09/09/2021

**An Coimisiún um Rialáil Cumarsáide**  
**Commission for Communications Regulation**

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## Submissions Received from Respondents

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# 1: Health Service Executive

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**Conor Mahon**

**From:** Tadgh Buckley (Network Manager) <Tadgh.Buckley@hse.ie>  
**Sent:** Monday 16 August 2021 16:07  
**To:** Market Framework Consult  
**Cc:** Melissa Cotter; Helen Coughlan (CTO); Tadgh Buckley (Network Manager)  
**Subject:** FW: Reference Consultation 2175 "Review of the Numbering Conditions of Use and Application Process"  
**Attachments:** HSE COMREG NGN EXTENSION LIST.xlsx

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Hi Conor,

The HSE have over 130 NGN 1890/1850 numbers in operation – Over the last few months we have been going through these with business owners to implement a change to 1800/0818 replacements. The 16 numbers on attached are numbers that we would like to put through for consultation with ComReg as we would have difficulty getting these changed by 31<sup>st</sup> December 2021 due to the fact widely published many outside of the control of HSE.

The HSE acknowledges that if a favourable outcome arises from consultation process that the extension duration is binding and no further extension will be sought.

Regards,

The HSE's Office of the Chief  
Information Officer, Delivering



#eHealth4All  
[www.ehealthireland.ie](http://www.ehealthireland.ie)

Tadgh Buckley,  
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Need information and advice on COVID-19? Go to [www.hse.ie/coronavirus](http://www.hse.ie/coronavirus)

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## HSE NGN LIST- PROPOSAL for EXTENSION to 2022: ComReg Consultation 21/75

#	NGN NUMBER	SERVICE NAME	SERVICE DESCRIPTION	WHY THIS NUMBER REQUIRES EXTENSION
1	1850777911	NEDoc	Emergency Out Of Hours Medical Service	The North East Doctor On-Call Service (NEDOC) is an urgent GP Out-of-Hours Service which operates from 6pm to 8am weekdays and 24 hours weekends and public holidays. Members of the public can access the service by calling a single lo call number 1850 777 911. The call centre handles approximately 90,000 calls per year. The winter season is much busier than summer and with onset of winter seasonal ailments, colds, coughs and flus and treating elderly patients both in the community and in nursing homes. Christmas and the New Year period are the busiest times for the service as day time surgeries are closed for 4 consecutive days and 3 consecutive days, therefore GP Out of Hours Services pick up the calls during these busy times. As the current plan is to cease the 1850/1890 numbers with effect from 1 <sup>st</sup> January 2022, I would request that due consideration be given to extend this date.
2	1850224477	D-Doc/ North Doc (company that provides GP)	Emergency Out Of Hours Medical Service	D-DOC provides an urgent GP Out of Hours service which operates from 6pm to 8am weekdays and 24 hours weekends and public holidays in the north Dublin area. It is essential that our service users are able to access the details of the service quickly. The DDoc Service is promoted in every health centre, every GP Service and every Pharmacy across Dublin North City and County as well as online through the HSE website and Northdoc Medical Services CLG website (who work in partnership with the HSE and provide GPs for the service). Notification to all networks and business cards, prescription paper (both GMS and private) and notepaper will require altering. Given the massive increase in the number of urgent and emergency calls to this service through the Covid pandemic, resources are stretched to the limit. Therefore it is imperative that there is no interruption to this essential service.
3	1850302702	MIDOC	Emergency Out Of Hours Medical Service	1850 302 702 is the sole contact for emergency out of hours GP services over the counties of Laois, Offaly, Longford and Westmeath. Any issue with this number would result in no out of hours GP services being contactable for the 4 counties. As you can imagine, this would cause a huge risk to patients welfare if this change over is not carried out in a controlled manner. Due to Covid 19, there is an increased reliance on this service as patients are reluctant to present in Emergency Departments due to the risk of contracting Covid in such a high risk environment. This reluctance, in conjunction with difficulties contacting GP Emergency out of hours service, could result in serious consequences for patients. Due to disruption of calls as a result of Covid 19 and the recent Cyber attack, the MIDOC Service is finding it difficult to publicise a new number for the MIDOC Service. Due to these difficulties, the service is not confident that all patients will be aware of new contact details for January 2022. Taking this into consideration, I request that consideration be given to continuing the present number for the foreseeable future.
4	1850400911	Now Doc	Emergency Out Of Hours Medical Service	The North West Doctor On-Call Service (Now DOC) is an urgent GP Out-of-Hours Service which operates from 6pm to 8am weekdays and 24 hours weekends and public holidays. Members of the public can access the service by calling a single lo call number 1850400911. The call centre handles approximately 60,000 calls per year. The winter season is much busier than summer with onset of winter seasonal ailments, colds, coughs and flus and treating elderly patients both in the community and in nursing homes. Christmas and the New Year period are the busiest times for the service as day time surgeries are closed for 4 consecutive days and 3 consecutive days, therefore GP Out of Hours Services pick up the calls during these busy times. As the current plan is to cease the 1850/1890 numbers with effect from 1 <sup>st</sup> January 2022, I would request that due consideration be given to extend this date.
5	1890100016	HSE Organ Donation Line	HSE Organ Donation Number	1890100016 is the one and only National referral line for organ donation in Ireland. It is used by intensive care staff in hospitals around Ireland (adult and paediatric) to contact our National Organ Procurement Team here at ODTI when an eligible donor is identified. An organ procurement manager is on call with this direct line 24/7 365 days a year. When contact is received via this line it marks the beginning of the organ donation process which leads to the transplantation of vital organs to critically ill individuals. ODTI is requesting that 1890100016 be left active for a period after 1st January 2022 with a message informing callers of change to 1800100116. ODTI will communicate imminently with the organ donor network nationally however, given the critical nature of the function of this line the risk the message does not reach all individuals would have a major impact i.e. loss of potentially transplantable organs. Calls to this line often occur in out of hours periods when support would not be available should an individual not successfully connect. Further to this ODTI promote the contact number which is included on documentation and stationary etc. circulated nationally. Despite communication out and advice to remove stationary there is a risk residual stationary may cause some confusion.
6	1850211869	Aero Medical Despatch- National Ambulance Service	Emergency Ambulance Air Service	This number is used by the "blue light" emergency services to contact Ambulance services for emergencies that may not be accessible across the road network. On receiving such a call a helicopter is dispatched with the co-ordinates of the emergency. This number is pre-programmed in many of the services like mountain rescue/coastguard systems and we would require an extension beyond December 2020 to ensure we can distribute a new number.
7	1890499299	Patient Transport Service	Regional and Non-Emergency Patient Transport Service	We would like an extension beyond the 31st December 2021 as this is a critical contact number for the South East Region for Non Emergency Patient Transport. This number is pre-programmed in many healthcare provider systems as first point of contact for any patient transfers. Due to time constraints caused by Covid and the recent Cyber Attack it would be very difficult to complete the necessary communications required to ensure a smooth transition to the new number.
8	1890252919	National Medical Card Support Line	Patient Medical Card Line	This number is the Helpline for the National Medical Card Unit and, on average, the line receives 2500 calls per day. We have two other 1890 numbers associated to the main line which deals with GP queries and queries from members of the Oireachtas. This number is in the public domain for many years (since centralisation of the National Medical Card Unit in 2011) and is also a familiar number to all Community Health Organisations, GP Surgeries, Social Work departments, TDs. It is on all correspondence and application forms, as well as our website. For the transition of a number such as this, is a large project and I feel that coming near the end of Q3 of this year is not sufficient time for the NMCU to take on the task and particularly factoring in COVID-19.
9	1890252920	General Practitioner Medical Card Support Line	GP Medical Card Line	This number is the Helpline for the National Medical Card Unit and, on average, the line receives 2500 calls per day. We have two other 1890 numbers associated to the main line which deals with GP queries and queries from members of the Oireachtas. This number is in the public domain for many years (since centralisation of the National Medical Card Unit in 2011) and is also a familiar number to all Community Health Organisations, GP Surgeries, Social Work departments, TDs. It is on all correspondence and application forms, as well as our website. For the transition of a number such as this, is a large project and I feel that coming near the end of Q3 of this year is not sufficient time for the NMCU to take on the task and particularly factoring in COVID-19.
10	1890252929	Medical Card Support	Medical Card Line	This number is the Helpline for the National Medical Card Unit and, on average, the line receives 2500 calls per day. We have two other 1890 numbers associated to the main line which deals with GP queries and queries from members of the Oireachtas. This number is in the public domain for many years (since centralisation of the National Medical Card Unit in 2011) and is also a familiar number to all Community Health Organisations, GP Surgeries, Social Work departments, TDs. It is on all correspondence and application forms, as well as our website. For the transition of a number such as this, is a large project and I feel that coming near the end of Q3 of this year is not sufficient time for the NMCU to take on the task and particularly factoring in COVID-19.
11	1850444925	HR Helpdesk Support Line	HSE National HR Helpline	The National HR Employee Helpdesk provides a customer services function which is available to every public sector employee within the State. It is a national service and given the vast geographical area that we cover it is imperative that the new number be distributed to all services across the country. With Covid-19 and the recent Cyber Attack it is a big ask to complete our marketing, communications and public relations activities around our new number on a national scale before December 2021.

## HSE NGN LIST- PROPOSAL for EXTENSION to 2022: ComReg Consultation 21/75

#	NGN NUMBER	SERVICE NAME	SERVICE DESCRIPTION	WHY THIS NUMBER REQUIRES EXTENSION
12	1850241850	HSE Live	HSE Live Support number for vaccinations and health services	It is critical that we have a voice message on these two numbers after 31st December as this is the primary customer service number for HSELive the HSE's Customer service team and the COVID-19 Helpline. This number is widely known and whilst we have moved the bulk of calls to the 1800 700 700 number we need to communicate to anyone that is calling the 1850 numbers that they should dial the 1800 number. This is a critical public health issue.
13	1850636313	HSE Live	HSE Live Support number for vaccinations and health services	It is critical that we have a voice message on these two numbers after 31 <sup>st</sup> December as this is the primary customer service number for HSELive the HSE's Customer service team and the COVID-19 Helpline. This number is widely known and whilst we have moved the bulk of calls to the 1800 700 700 number we need to communicate to anyone that is calling the 1850 numbers that they should dial the 1800 number. This is a critical public health issue.
14	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.	This number is used for for staff to access H&S advice, support and information. Due to Covid and the stress on frontline healthcare workers this line has a high volume of calls and is widely published across all healthcare provider facilities. Having this extension would ensure that all staff can still access this phone support service while we can alert them to the changes via social media etc. However not all staff have access to same in this case an extension beyond Dec 2021 would be of great benefit to ensure the smooth transition.
15	1890424555	HSE Your Service Your Say	General Public Feedback line	This number is used for the national Your Service Your Say feedback service so the number is widely used both within and outside the HSE. The use of the 1890 number will need to go beyond the 31 <sup>st</sup> December as there is a lot of published/printed information on the service in circulation with the old number on it that will not be re-printed before then.
16	1850200776	HSE Appliance Recycling, Repair and Service	HSE cleaning and repair service for all HSE equipment- for patients at home	The 1850 200776 is used for Community Care Equipment in Longford/Westmeath. This number was printed on the Asset Tag of in excess of 40,000 items of equipment over the last 11 years. The majority of this equipment is in use in clients homes. The number is used by clients to contact HSE if equipment is found to be defective or is no longer required and needs to be collected. As some of this equipment is in use by palliative care clients, it is essential that there is no delay in contacting HSE when required. Due to Covid 19, there is a far greater number of clients being treated at home. This results in increased items of equipment in the community, thus resulting in increased pressure on the service. Due the recent cyber attack, all information in relation to the location of this equipment is not available as the ECRI AIMS System, which tracks this equipment, is not available and there is no time scale as to when it will be available.

## 2: Three Ireland (Hutchinson) Limited

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16<sup>th</sup> August 2021

Mr. Conor Mahon  
Commission for Communications Regulation  
One Docklands Central  
Dublin 1

Dear Conor

### **Review of the Numbering Conditions of Use and Application Process**

I refer to ComReg decision 21/75 regarding numbering, and the follow-on consultation regarding Non-Geographic Numbers used by the HSE. ComReg has received a request from the HSE to extend operation of some numbers in use by the HSE on an exceptional basis and is seeking comments as follows:

*Q.1 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.*

No doubt the last 18 months have been exceptionally difficult for the HSE. It has been at the centre of activities to reduce the spread of Covid-19 and to roll-out the vaccination programme, etc. Matters have not been helped by the cyber-attack in May of this year. Maintaining communications throughout this period has been critically important, for the HSE and more broadly for the general population. Three and other operators have played their part during this crisis and brought in several exceptional measures to help the country to stay connected through that period. The exceptional demands on the HSE will not have helped them in preparing to retire certain numbers that are to be withdrawn at the end of this year.

That said, ComReg needs to be careful in its approach to creating “exceptions”. ComReg has been very firm in its position that all numbers beginning with 1850, 1890, and 076 will cease operation by the end of 2021. A very short list of exceptions (6 in total) has been agreed following consultation with the CER, utility operators and ComReg’s Numbering Forum. Each number in the exceptions list was assessed against an agreed set of criteria which are documented. Those criteria do not cater for the unprecedented and exceptional events that the HSE has had to deal with in recent times.



ComReg needs to be aware that several other organisations may also seek to extend the operation of their own numbers on account of difficulties encountered as a result of Covid-19. A consistent and objective approach will need to be taken to such requests. We recommend 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 we have certainty on the numbers that are to be included as soon as possible. While ComReg is working to deliver this by the end of September, this should be delivered earlier if possible. For this reason, ComReg should go ahead now to carry out its assessment and deliver the final list of exceptions. While noting that a smaller list of exceptions is easier to implement on the network, Three will work to implement the final list. Getting certainty early is what is important now.

Yours Sincerely

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Tom Hickey

### 3: Vodafone Ireland Limited

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Commission for Communications Regulation  
One Dockland Central,  
Guild Street,  
Dublin 1,  
Ireland,  
D01 E4X0  
16 Aug 2021.

By email.

Attn: Mr Conor Mahon

Dear Sir,

Vodafone welcome ComReg 21/75 , “ Review of the Numbering Conditions of Use and Application Process, Response to Consultation 21/28, Decision and Further Consultation”.

We would like to make the following brief submission to the Question posed in the Further Consultation.

**Question:** 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.

While we again point out to ComReg the difficulty in implementing bespoke solutions for small quantities of numbers, and the added difficulty of implementing any change in the period immediately before Christmas, we do, on balance, agree with the proposal to extend the operation of up to 30 NGNs in use by the HSE.

Given the importance of completing vaccination programs it is incumbent on industry to support the work of the HSE at this time.

We appreciate the efforts ComReg have made to complete and minimise this list but ask that every effort is made to finalise the matter as soon as possible to ensure no errors are made in implementation of an exception list.

Regards

Eamon Farrell

**Vodafone Ireland Limited**

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