



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

## Information Notice

Extension of the consultation period for Document 23/52 and opportunity for clarifications

### Information Notice

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

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## Introduction

- 1.1 On Friday 16 June 2023, ComReg published Consultation Document 23/52<sup>1</sup> setting out ComReg's proposals for combatting scam calls and texts. This consultation aims to consider and identify what network-based interventions are required to combat Nuisance Communications and thereby reduce the economic and societal harm caused to Irish consumers, businesses, and society, in accordance with ComReg's statutory functions and objectives and duties.
- 1.2 ComReg provided a six-week period until Friday 28 July 2023 for interested parties to provide views on all aspects of Document 23/52. In doing so, and given the breadth of issues covered in the consultation, ComReg provided an additional two weeks over the normal four weeks identified in ComReg's Consultation Procedures<sup>2</sup>.
- 1.3 On Friday 14 July, four weeks after the publication of Document 23/52<sup>3</sup>, ComReg received a request from business representative group IBEC<sup>4</sup> (See Annex 1) for an extension of the 28 July deadline to the end of August 2023. It also requested engagement on questions that it would provide to ComReg (in particular regarding Chapter 6 and the update to the Numbering Conditions).
- 1.4 Given the scope of the proposed interventions<sup>5</sup>, ComReg considers it appropriate, on an exceptional basis, to provide an opportunity for interested parties to request clarification on any aspect of these interventions. Further, and in the interests of transparency and non-discrimination, ComReg is providing the opportunity to all interested parties to submit Clarification Question(s), and not just an industry representative group.
- 1.5 For the avoidance of doubt, such questions should be strictly limited to those requesting clarification on the matters discussed in the consultation (e.g., the proposed interventions and/or the associated updates to the Numbering Conditions). Any questions beyond this scope which, for example, relate to the merits or otherwise of the proposed interventions and/or the updates of the Numbering Conditions will not be considered at this time. Such questions can only be considered as part of ComReg's formal response to submissions received on Document 23/52.
- 1.6 To provide for an appropriate amount of time for interested parties to submit Clarification Questions and consider ComReg's response(s) to same, ComReg is

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<sup>1</sup> <https://www.comreg.ie/publication/consultation-on-combatting-nuisance-communications>

<sup>2</sup> See ComReg Document 11/34

<sup>3</sup> ComReg reminds TII that as per ComReg's Consultation Procedures (Document 11/34), a request for an extension should be made within one week of the date of publication of the consultation concerned.

<sup>4</sup> Telecommunications Industry Ireland ("TII") are the IBEC representative body for the electronic communications industry in Ireland. Member companies are involved in broadband, broadcasting, cable, data centres, fixed, mobile, satellite and wireless internet as well as equipment manufacturers and network providers.

<sup>5</sup> For example, ComReg considered ten interventions, proposing seven for implementation. These proposed interventions involved seven functional requirement specifications and seven draft Decision Instruments, including further proposed updates to the Numbering Conditions.

also extending the deadline for responses to Document 23/52, as requested by IBEC.

### Next Steps and Timelines

- 1.7 ComReg proposes to provide a period of one week for interested parties to submit Clarification Questions, with a further period of not more than two weeks for ComReg to provide its response<sup>6</sup>. With that in mind, ComReg provides the following timelines:
- Deadline for submission of Clarifications Questions regarding Document 23/52 - **5pm on Thursday 27 July 2023**.
  - Final date for ComReg to publish its responses to any Clarifications Questions on its website - **no later than Thursday 10 August 2023**.
  - Deadline for response to Document 23/52 to - **5pm on Thursday 31 August 2023**.
- 1.8 Clarification Questions must be submitted in written form (email) to the following recipient, clearly marked – Clarification Questions on ComReg 23/52:
- Mr. Donnacha Hennessy  
Commission for Communications Regulation  
Email: [marketframeworkconsult@comreg.ie](mailto:marketframeworkconsult@comreg.ie)
- 1.9 Electronic submissions should be submitted in an unprotected format so that they may be readily included in the ComReg submissions document for electronic publication.
- 1.10 Please refer to Section 9 (Next Steps) of Consultation 23/52 for further details on submitting a response to the consultation.

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<sup>6</sup> ComReg will endeavour to provide a response within a two-week period but depending on the volume and nature of the Clarification Question(s) reserves its right to take additional time to prepare its response.

## Annex 1: Correspondence from IBEC

From: Torlach Denihan <[REDACTED]>  
Sent: 14 July 2023 16:48  
To: George Merrigan <[REDACTED]>  
Subject: Consultation on Scam Calls and Texts (ComReg 23/52e)

**CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and believe the content is safe.**

Dear George

I write on behalf of the members of Telecommunications Industry Ireland (TII) to request clarification through direct engagement on certain aspects of ComReg's Consultation on Scam Calls and Texts (ComReg 23/52e).

All operators regard the problem of scam calls and texts as a very important issue and are currently working to implement the measures discussed at the Nuisance Communications Industry Taskforce as soon as possible.

Industry understands the economic, societal and reputational significance of this issue and therefore considers it critical to provide the best possible input to this consultation. To help with this, direct engagement is requested between TII and ComReg. To this end TII will provide ComReg with a series of questions (in particular regarding section 6 - Updating the Numbering Conditions). On occasion ComReg has provided this type of direct engagement to industry during public consultations and it has been extremely beneficial.

The number and sheer complexity of the proposed measures make this consultation particularly challenging. It is in effect six very detailed technical consultations bundled into one. This necessitates extensive internal consultation within companies with numerous technical colleagues. Responding by the deadline is made much more challenging by the fact that many key personnel are on annual leave during significant parts of the consultation period. It is also of relevance that it had been indicated by ComReg that this consultation would take place significantly earlier in the year (Q1) and resource planning was done by companies on this basis.

In view of the considerations outlined above and the need to consider the feedback on the questions to be submitted to ComReg, TII requests an extension of the deadline to the end of August to respond to this consultation.

In view of the significance of this issue it is hoped by industry that you can look favourably on this request; for our part we look forward to working collaboratively with ComReg to address the challenge posed by scam calls and texts.

Best wishes

Torlach

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