



Office of the Director of
**Telecommunications
Regulation**

Allocation of additional access codes and number ranges for Internet access

Consultation Paper

Document No. ODTR 00/94

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1. INTRODUCTION

During the consultation leading up to Decision Notice D9/99¹, interest was expressed in the possibility of opening up new specific access codes and number ranges for Internet traffic. The Director, in D4/00², took the position that such developments should be driven by demands in the marketplace. In considering these developments, the maximum benefit to end-users, amongst other things, would be taken into account.

Some access seekers now indicate that, due to the sustained and rapid growth in demand for Internet access and services, there may be a requirement to open up such specific access codes and number ranges for Internet traffic. The Director wishes to accommodate a range of Internet access pricing models. This consultation is intended to identify a set of access codes and number ranges that could be opened up in the near future in order to cater for current and future demand.

The Director administers the national numbering resource pursuant to her powers under both the Telecommunications (Miscellaneous Provisions) Act, 1996 and the European Communities (Interconnection in Telecommunications) Regulations, 1998 (S.I. No.15 of 1998), as amended.

The Director now invites views from interested parties on the questions posed in this paper. Comments should be submitted in writing before 5pm on Friday, 19 of January 2001 to:

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OR

Comments may be submitted via email to: hogano@odtr.ie.

¹ See Document No ODTR 99/46.

² See Document No ODTR 00/17.

All comments are welcome, but it would make the task of analysing responses easier if comments reference the relevant question numbers from this document.

In order to promote further openness and transparency, the ODTR will make copies of the comments available for public inspection at its offices, excluding commercially sensitive information. Where material that is commercially sensitive is included in a response, this should be clearly marked as such and included in an Annex to the response.

Following the consultation, the Director will issue a Decision Notice on the main issues raised.

This consultation paper does not constitute legal, commercial or technical advice. The Director is not bound by it. This consultation is without prejudice to the legal position of the Director or her rights and duties under legislation.

2. EXISTING NON-GEOGRAPHIC ACCESS CODES AND NUMBERS³ AND THEIR USE FOR INTERNET ACCESS

The main Internet access pricing models include the following three categories:

- “Pay-as-you-go” (PAYG) or "Freeserve" type models: the customer pays for the telephone calls to access the Internet but does not pay any subscription fees to the Internet Service Provider (ISP);
- “Flat rate” or untimed type models: the customer pays no call charges but pays a regular subscription to the ISP that allows them to access the Internet for a set number of hours, or even for unlimited time. This is sometimes limited to particular times of day; and
- Hybrid models: the customer chooses a mix of subscription charges and call charges that gives them the best deal, depending on their pattern of use of the Internet.

³ Non-geographic numbers are those that are not associated with a specific location, for example, 1800 Freefone, 1890 LoCall. For a full list of the access codes and number ranges that have already been allocated as well as those that have not, please refer to Document No ODTR 00/50, “Irish Telephony Numbering Scheme Status Report – July 2000.”

The existing “1891” access code has thus far been used for Internet access services based on the hybrid charging model. The “1890” shared cost access code may be appropriate for use with PAYG services, as these tend to be tariffed at a rate equivalent to that used for local calls. The “1800” freephone access code could be used for flat rate services. However, the Director sees benefit in the creation of codes designated specifically for Internet access traffic and linked to the PAYG and flat rate charging models. This could assist with efficient routing of traffic while preserving a link between codes and charging models to augment customer recognition of the relevant tariffs.

3. POSSIBLE USES OF ACCESS CODES AND NUMBER RANGES FOR INTERNET ACCESS

In addition to the retention of the 1891 XXX XXX access code and number range for hybrid charging models, the Director sees two possible additional access models that could be of use:

1. An access code and number range, e.g., 1892 XXX XXX, that would support “pay-as-you-go” Internet access models and would allow for efficient routing;
2. An access code and number range, e.g., 1801 XXX XXX or 1893 XXX XXX, that supports flat rate, subscription-based Internet access models and would allow for efficient routing, while retaining the freephone association.

Q 3.1 Do you agree that these models would be useful? Are there others that you would like to employ? Please list the set of retail pricing models that you believe should be allocated 18xx codes in order to facilitate Internet access.

With respect to the first proposal, there is an additional issue. As discussed in D4/00, the Director believes that individual Internet service providers should be able to set prices for their own access numbers, and that modern billing systems should be capable of accommodating such a regime. However, she also believes that the benefits associated with greater transparency may accrue to consumers if they can better anticipate the price that is associated with a particular code. Therefore, it may be sensible to constrain the range of tariffs that are associated with each specific

access code. For example, in the case of shared cost services, the Numbering Conventions⁴ link charges to the cost of local calls on the originating network:

11.3.3 Shared Cost numbers Usage

- 1 The charge made by network operators to callers to 1850 numbers shall be independent of the duration of the call, and shall in no case exceed the cost of a 5 minute call calculated at the appropriate local tariff rate of the network from which the call is made;
- 2 The charge to callers to 1890 numbers shall in no case exceed the cost of a call of the same duration calculated at the appropriate local tariff rate of the network from which the call is made.

Q 3.2 Do you feel that it is useful to constrain the range of tariffs that can be associated with each specific access code?

If it were decided that such constraints were necessary, the Director is of the opinion that there may exist differing preferences for an upper constraint on the range of tariffs in the form of a multiple of the local call rate on the relevant network or some other suitable absolute value.

Q 3.3 Do you have a preference for an upper constraint on the range of tariffs in the form of a multiple of the local call rate on the relevant network or some other suitable absolute value?

⁴ See Document No ODTR 00/10.