



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regu

Management and Maintenance of the National Directory Database

Additional Information

Information Notice

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An Coimisiún um Rialáil Cumarsáide
Commission for Communications Regulation

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Introduction

ComReg published a Consultation (ComReg Document 18/91¹) on 15th October 2018 which set out its preliminary view that PortingXS should be directed to manage and maintain the National Directory Database (“NDD”) from 1st April 2019 for a period of 3-5 years.

ComReg subsequently received a request for further information from a Service Provider. This information notice sets out the information requested and PortingXS’s answers to the questions raised.

ComReg notes that should it decide to direct PortingXS to manage and maintain the NDD it will engage with users of the NDD (service providers, direct marketing companies and DQ providers) and Eir as the current manager of the NDD to agree a transition plan.

¹ ComReg Document 18/91, “*Management and Maintenance of the National Directory Database*”, 15 October 2018

Further Information

What follows are the specific requests and the relevant responses as confirmed by PortingXS to ComReg.

The technical interface / standards / processes that PortingXS propose Service Providers would use to update their data as referenced in paragraph 47 of the consultation.

- a. PortingXS will make two interfaces available to service providers to update their data which are:
 - i. XML API Interface
 - ii. SFTP File Exchange based on Excel files in a .CSV format
- b. PortingXS notes that based upon the specifications from NDS1² and NDS2³ it understands that the files are based on ASCII format. PortingXS notes that it will be able to support this current interface specification should it also be deemed necessary.

The technical interface / standards / processes that PortingXS propose to use to provide information to Direct Marketing companies and Directory Enquiry Service Providers as referenced in paragraph 47 of the consultation.

- a. PortingXS has its own service available for marketing preference settings called a “Robinson List”⁴. The Robinson List settings will be matched with current settings for the NDD. Direct Marketing Companies and Directory Enquiry Service Providers can query or update their information based on the two available interfaces:
 - i. XML API Interface
 - ii. SFTP File Exchange based on Excel files in a .CSV format

² https://www.openeir.ie/uploadedFiles/Content/NDD/NDS1%20V2.2%20-DIRECTORY%20INPUT%20SPECIFICATION%20_L.pdf

³ https://www.openeir.ie/uploadedFiles/Content/NDD/NDS2%20V2.0%20-DIRECTORY%20OUTPUT%20SPECIFICATION%20_.pdf

⁴ A “Robinson list” is the name given by PortingXS to its opt-out list of people who do not wish to receive unsolicited marketing transmissions,

- b. PortingXS notes that based on the specifications from NDS1 and NDS2 it understands that the files are based on ASCII format. PortingXS's solution will be able to support this interface specification.

PortingXS proposed approach / plans to migrate all existing records onto the new NDD as referenced in paragraph 47 of the consultation.

- a. All test cases e.g. data upload, download and information distribution will be performed within a designated test period.
- b. As part of the Migration plan PortingXS expects the users of the system to perform testing during this period, this testing will include upload to and download from the NDD.
- c. In addition, as the current NDD manager Eir will be requested to:
 - i) Provide sample files and specifications that are used for the various users and processes,
 - ii) Provide a complete copy of the data before the migration to see how this information can be processed and to perform a test run,
 - iii) Provide a complete final data set.
- d. After successfully completing all tests and finishing the test period PortingXS recommends a hard cut over for the migration and the Go Live.

The Firewall / security standards proposed by PortingXS and details of cyber security penetration tests to the extent that they impact on Service Providers, Direct Marketing Companies and Directory Enquiry Service Providers as referenced in paragraph 57 of the consultation.

- a. The NDD system will run on two geo redundant locations and is protected via a Firewall which is maintained according to the latest security standards. PortingXS can confirm that it is currently up to date with industry security standards and that it intends to maintain this position going forward.
- b. Access to the NDD system is via strict user management and all data is password protected.
- c. PortingXS will provide 48 hours notice of planned work to database users.