



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Review of the Numbering Conditions of Use and Application Process

Consultation

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An Coimisiún um Rialáil Cumarsáide
Commission for Communications Regulation

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1 Introduction and Overview

- 1 ComReg regularly reviews and updates its Numbering Conditions of Use and Application Process document (“Numbering Conditions”)¹. The last update was in April 2024, following ComReg’s consultation published in June 2023² and its Response to Consultation in April 2024³. This ensures that ComReg addresses any issues that have arisen since the prior update, by proposing new or amended eligibility criteria and conditions of use. It is also an opportunity to make any necessary administrative amendments. In general, we aim to strip out any conditions of use that have become obsolete, and propose new or amended conditions to take account of legislation, new project outputs, new products, market developments or changes to industry processes. It is also an opportunity to make textual improvements to increase clarity and update document reference links where needed.
- 2 The main areas addressed by this update are as follows:
 - i. Section 2: “SMS Sender ID Registry (“Sender ID Registry”); This contains ComReg’s proposed updates to the Rights of Use conditions for SMS Sender IDs (“Sender IDs”) which are set out in Section 6 of the Numbering Conditions. Updates to eligibility criteria for Sender IDs are addressed in Section 7.2 of the Numbering Conditions.
 - ii. Section 3: “SMS - Origination”; This contains proposed obligations in Section 3.1 of the Numbering Conditions on undertakings that originate SMS on the Irish PSTN.
 - iii. Section 4: “Geographic Numbering - Eligibility Criteria”; This contains a proposed update to the eligibility criteria for Geographic Numbers which are set out in Section 7.2 of the Numbering Conditions.
 - iv. Section 5: “Sub-Assignment and Transfer - Updates”; This contains proposed updates and clarifications to the Rights of Use conditions for Sub-Assignment in Section 3.2 of the Numbering Conditions. ComReg also outlines its observations concerning the implementation of Sub-Assignment since its adoption and inclusion in the current Numbering Conditions following ComReg’s Decision D15/24 set out in ComReg 24/24 in April 2024.

¹ [ComReg 15/136R4](#) - Numbering Conditions of Use and Application Process

² [ComReg 23/52](#) - Consultation - Combatting scam calls and texts

³ [ComReg 24/24](#) – Response to Consultations and Decisions - Combatting scam calls and texts

- v. Section 6: “Review of Minimum Numbering Areas (“MNA”)”; This section reviews the MNA concept.
- vi. Section 7: “Mobile Numbering Eligibility Criteria”; In this section ComReg addresses two topics as follows;
 - a. Providers of private mobile networks; ComReg proposes the appropriate Mobile Network Code (“MNC”) for such networks in Section 7.2 of the Numbering Conditions.
 - b. OTT Service Providers; ComReg proposes clarifications concerning the eligibility criteria for such service providers in Section 7.2 of the Numbering Conditions.
- vii. Section 8: “Mobile Number Plan Management”; In this section ComReg proposes a long-term plan to increase mobile number capacity in the future, should additional mobile numbers be required.
- viii. Section 9: “Leasing of Global Titles (“GT”) created using Irish Mobile Numbering Resources”⁴; Mobile Service Providers (“MSPs”) may use their assigned mobile numbers to form GTs. In this section ComReg reviews the practice and risks associated with the leasing of such GTs and considers how to address these risks.
- ix. Section 10 “Number Management”; ComReg considers the potential for an automated number management system, particularly to support easier submissions of Sub-Assignment notifications by industry;
- x. Section 11: “Administrative updates”; In this section ComReg proposes to update the Numbering Conditions to clarify details or remove redundant text which includes the following;
 - a. Clarity concerning the Rights of Use of numbers where there is a change of Holder name.
 - b. Updates to the tables in Appendices 4 and 5 to accommodate the introduction of Sub-Assignment. These tables, respectively, request details of the utilisation of Geographic and Mobile Numbers held by an Applicant for numbers. The calculation of number utilisation, as set out in Section 7.1(14), is also amended to account for Sub-Assignment.

⁴ Global Title (GT) Leasing is a commercial arrangement where mobile network operators (“MNOs”) rent their signalling addresses (GTs) to third parties (e.g. SMS aggregators) to access the global SS7 network for roaming, SMS delivery, and traffic routing.

- c. Removal of references to 1850 and 1890 NGNs as these number ranges have been withdrawn.
- xi. The remaining Sections (Sections 12 and 13) provide, respectively, guidance on making a submission to this consultation and the list of the questions posed by ComReg in this consultation.

2 SMS Sender ID Registry

Rights of Use Conditions

- 3 ComReg's Decision Instrument D14/24⁵, mandated the establishment of an SMS Sender ID ("Sender ID") Registry⁶ which now allows businesses to register their Sender ID with ComReg. The aim of the Sender ID Registry is to reduce the prevalence of scam SMS that use Sender IDs to impersonate legitimate businesses and organisations.
- 4 ComReg formally launched the Sender ID Registry on 4 June 2025⁷ for First Come First Served applications for Sender IDs. Since its launch, the learnings from the design, development and ongoing experience of registration by ComReg of organisations and their Sender IDs and the associated service providers ("Sender ID project learnings"), highlighted a requirement for ComReg to update the SMS Sender ID Rules of Registration⁸. Following discussion at the Nuisance Communications Industry Forum ("NCIF")⁹, ComReg included these updates in the Rules of Registration document.
- 5 ComReg's Numbering Conditions of Use and Application Process document ("Numbering Conditions")¹⁰ includes Sender ID as a class of number. Therefore, while the Sender ID project learnings highlighted the urgent need to update the Rules of Registration document, ComReg notes that this document derives from, and must align with the relevant provisions of the Numbering Conditions. Thus, ComReg needs to update the numbering conditions of use attached to Sender IDs to codify the updates arising from the Sender ID project learnings.
- 6 Section 6(1) of the Numbering Conditions sets out the maximum character length of a Sender ID. However, to ensure a Sender ID is clearly associated with its registering organisation and to avoid registration attempts for very short Sender IDs, the minimum character length should also be specified. To that end ComReg proposes to add the following underlined text as indicated:

⁵ [ComReg 24/24](#) – Combatting scam calls and texts – Response to Consultation on network-based interventions to reduce the harm from Nuisance Communications, Decision D14/24, page 361.

⁶ [SMS Sender ID Registry](#) – ComReg webpage

⁷ [ComReg media Release](#) - Media Release - ComReg launches Registry for organisations to help prevent SMS text message scams in Ireland

⁸ [Sender ID Rules of Registration](#) - available for download on Sender ID Q&A webpage

⁹ [ComReg 24/35](#) - Formation of the Nuisance Communications Industry Forum – Information Notice

¹⁰ [ComReg 15/136R4](#) – Appendix 10

“SMS Sender IDs (“Sender ID”) are encoded according to the GSM 7-bit default alphabet and as such a Sender ID can have a minimum length of 3 characters and a maximum length of 11 characters”.

- 7 Section 6(2) of the Numbering Conditions sets out the valid characters permitted for a Sender ID. ComReg proposes to add the following underlined text and delete the text as indicated:

a) *a-z A-Z 0-9 @ ! # % & () * + , - . / : ; < = > ? ~~Fada~~ ‘ [Space] underscore*

b) *Characters with an Irish language fada (subject to technical feasibility).*

- 8 PART III “THE DECISIONS” Section 1(I)(3) of Decision Instrument D15/24, sets out that Sender ID registration and filtering shall be case-insensitive. To align with D15/24 in this respect, ComReg proposes to amend Section 6(3) by deleting text and adding the underlined text as follows:

“(3) Sender ID registration and filtering is case insensitive. A given Sender ID is assigned to a PA-SIDO to use in whatever choice of case they prefer, however the messages should be treated identically irrespective of the case used.”

- 9 Based on the Sender ID project learnings, ComReg noted the benefit to industry in permitting certain dialable short codes as a Sender ID. Therefore ComReg proposes to add the following underlined text as new Section 6(4) of the Numbering Conditions:

6(4) The following Network Dialable (short) Codes, which are free to call and have already been assigned to the holder, can be registered as a Sender ID:

a) *Customer Support Short Codes (19XX):*

b) *European Emergency Services (112) and National Emergency Services (999); and*

c) *Harmonised Codes of Social Value (116XXX).*

- 10 Furthermore, in a reaction to its introduction of the Sender ID Registry, ComReg is aware that scammers have moved to spoofing Irish five-digit SMS messaging and payment Short Codes (“short codes”) in their attempts to deceive end users. The use of short codes is attractive to scammers as the general public are familiar with them and regularly interact with them.
- 11 Therefore, to counteract this activity, ComReg proposed that these short codes may be registered with ComReg by their legitimate holders and, once registered, be permitted as Sender IDs for one way A2P SMS traffic. ComReg presented this proposal to the NCIF and, as there was much positivity from members, included the registration of short codes in the format 5XXXX (where X is a number from 0-9) in the Rules of Registration document for Sender IDs. ComReg now codifies the registration of Short Codes on the Registry by adding the following text as new Section 6(5) in the Numbering Conditions;

(5) Messaging and Payment Short Codes with the structure 5XXXX, where X is a number from 0 – 9, that have already been assigned to the holder, can be registered as alphanumeric Sender IDs for use on the (one-way) Application-to-Person SMS channel. This registration is separate and distinct from the role of 5XXXX Short Codes on the MO-MT transactional SMS channel.

- 12 The update of the Numbering Conditions in relation to the registration of five-digit Messaging and Payment Short Codes on the Sender ID Registry, addressed above, refers to the “the MO-MT transactional SMS channel”. The MO-MT (Mobile Originated - Mobile Terminated) transactional SMS channel is a two-way SMS messaging solution that supports free-rate, standard-rate and premium-rate communications between businesses and customers. Customers may initiate a dialogue by sending mobile-originated (MO) messages to an application and receive corresponding mobile-terminated responses, or they may receive MT messages from an application first and respond with MO messages. 5XXXX Messaging and Payment Short Codes have served as source or destination addresses for this channel since 2002. All existing rules governing the use of the MO-MT transactional SMS channel continue to apply.
- 13 Thus, to clarify the reference to MO-MT (Mobile Originated - Mobile Terminated) transactional SMS channel in the new condition, ComReg will add the definition to Appendix 12 as follows:

“MO-MT (Mobile Originated - Mobile Terminated) transactional SMS channel” means a two-way SMS messaging solution that supports free-rate, standard-rate and premium-rate communications between businesses and customers.

- 14 To further refine the Rights of Use conditions, ComReg also proposes to add the following as a new Section 6(6) of the Numbering Conditions;

(6)The Sender ID shall comply with the following;

- a) contain at least one letter (a-z A-Z), except for permitted Network Dialable (short) Numbers and Messaging and Payment Short Codes; other requests will be considered on a case-by-case basis;
- b) not contain predominantly numbers, except for permitted Network Dialable (short) Numbers and Messaging and Payment Short Codes; other requests will be considered on a case-by-case basis;
- c) be in any combination of upper and/or lower case;
- d) not be generic in nature (e.g. 'SMS', 'Verify', 'Doctor', 'Dentist', 'Flowers' etc);
- e) not be sensitive, offensive or obscene in nature;
- f) not contain leading or trailing spaces;
- g) not be likely to cause confusion.

Eligibility Criteria

15 ComReg proposes to add the following additional eligibility criteria in Section 7.2(8) of the Numbering Conditions:

- (i) To enable ComReg to assess a Sender ID Owner's (SIDO) application for a Sender ID where there is no clear link between the SIDO and the requested Sender ID, ComReg proposes to add the following text as new paragraph (b);

(b) If an Applicant is seeking to register a Sender ID that is not clearly linked to its company name or business, it may be requested to provide Trademark Certification and/or supporting information or documentation to

justify its choice of Sender ID.

- (ii) To allow for a Participating Aggregator (PA) to be also considered a SIDO and therefore have the right to apply for a Sender ID for its exclusive use, ComReg proposes to add the following text as new paragraph (d):

(d) The Sender ID rights of use shall be held by only one SIDO for their exclusive use. Please note that a PA may be considered a SIDO.

- (iii) To allow for a Third Party, in addition to a Registered PA, to be eligible for the assignment of a Shared Sender ID, ComReg proposes to add the following underlined text in new paragraph (e):

(e) "The applicant for a Shared Sender ID shall be a Registered PA or a Registered Third Party".

Metrics

- 16 ComReg's Decision Instrument D14/24 in ComReg 24/24 sets out the Sender ID intervention including the obligations on relevant undertakings concerning submission of metrics to ComReg. Consequently, there is no requirement for further obligations to be included in the Numbering Conditions in this respect.

Q. 1 Do you agree with ComReg's proposal to amend the SMS Sender ID conditions as set out above? Please explain the basis for your response in full and provide supporting information.

3 SMS – Origination

17 As set out in Section 2(2) of the Numbering Conditions, each numbering condition falls into one of two categories, one that is attached to a Right of Use ("RoU") and one attached to the General Authorisation ("GA")¹¹. Paragraph 15.1 of the GA sets out that *"The conditions attached to this General Authorisation which relate to use of numbers from the national numbering scheme, by any authorised undertaking, are set out in the "Numbering Conditions of Use and Application Process", ComReg Document No. 15/136R1, as amended. For the purpose of monitoring and enforcing compliance by authorised undertakings with the number conditions attached to this General Authorisation, this document and the Numbering Conditions of Use and Application Process shall, as appropriate, be read as one."* ComReg proposes to update the Numbering Conditions by including a GA condition, namely the origination of an SMS.

18 Section 3.1(5) of the Numbering Conditions sets out GA conditions that apply in respect of Calling Line Identification ("CLI"). As addressed in the previous Section on the Sender ID Registry, ComReg has proposed updates to the Numbering Conditions arising from learnings from the implementation of the Registry. However, an additional update to the Numbering Conditions that addresses the equivalent of CLI for SMS is also required. In this document the equivalent to CLI for SMS is referred to as Originating Identification ("OI"). Thus, ComReg proposes a new Section 3.1(6) as follows:

(6) The undertaking which originates an SMS on the Irish PSTN for the Sending Party shall ensure that the number displayed as Originating Identification ("OI") shall be:

- i. The assigned mobile number (E.164 number, in national or international format) for the Sending Party;
- ii. The assigned Messaging and Payment Short Code (5xxxx) for the Sending Party;
- iii. The assigned Network Dialable Short Code (19xx, 112, 999 or 116xxx) for the Sending Party; or
- iv. The registered SMS Sender ID for the Sending Party.

19 In relation to OI, the Undertaking which originates an SMS on the Irish PSTN should note part IV paragraph 9 of ComReg's decision D14/24 of ComReg 24/24

¹¹ [ComReg 03/81R6](#) - General Authorisation for the Provision of Electronic Communications Networks and Services. Readers should be aware that [ComReg document 25/21](#) is a version of the General Authorisation with updated legislative references.

which sets out that “*Undertakings that are MSPs must block any SMS bearing an originating number in the Irish number range, fixed, mobile or a short code, when presented for delivery from an SMSC which is not operated by or on behalf of an Irish MSP.*” ComReg therefore proposes to reference this Decision in the Numbering Conditions by inserting the following text as a footnote;

(6) The undertaking which originates an SMS on the Irish PSTN^{footnote} for the Sending Party...

Footnote; Please also note ComReg’s decision D14/24 of ComReg 24/24 - part IV paragraph 9

Q. 2 Do you agree with ComReg’s proposal to provide conditions for SMS Originating Identification as set out above? Please explain the basis for your response in full and provide supporting information.

4 Geographic Numbering – Eligibility Criteria

- 20 Section 4.1(2) of the Numbering Conditions sets out the following Rights of Use (“RoU”) condition: “A *Geographic Number shall only be assigned to an end-user whose residential/business premises is physically located within the designated minimum numbering area (MNA) for that Geographic Number.*” The “minimum numbering area” (MNA) is, as defined in Appendix 12 of the Numbering Conditions, one of the 106 geographic areas associated with Geographic Numbers, as defined in the “the National Numbering Plan”. For the purposes of this consultation, this RoU condition will be known as the “physical location” condition.
- 21 In March 2021, ComReg consulted¹² on whether it was appropriate to change this physical location condition such that Cloud Services could be facilitated by using Geographic Numbers without the requirement for the end user to be physically located within the designated MNA. In order to inform its assessment, ComReg commissioned Behaviour & Attitudes Limited (“B&A”) to conduct a consumer market research survey¹³ and gather relevant research in order to understand how users engage with the Geographic Numbering platform. ComReg then set out its preliminary view that, in assessing the information before it, the removal of the physical location requirement from some or all assignments would not be appropriate.
- 22 In July 2021, in its response to consultation¹⁴, ComReg set out its analysis, and taking into account respondent’s views, concluded that, on balance, the physical location condition should remain for the reasons set out in that document.
- 23 In June 2023, and to combat the upsurge in scam communications, ComReg consulted¹⁵ on seven proposed interventions, five voice-based and two SMS-based, including an SMS Scam filter. Of the five voice interventions adopted by ComReg, as set out in its response to consultation¹⁶, four specifically targeted the spoofing of Irish fixed and mobile numbers by scammers. These were the Do Not Originate, Protected Numbers, Fixed CLI Call Blocking and Mobile CLI call blocking interventions (“four CLI-based interventions”).

¹² [ComReg 21/28](#) - Review of the Numbering Conditions of Use and Application Process – Consultation

¹³ [ComReg 21/28b](#) - Geographic Numbering Survey - Quantitative report

¹⁴ [ComReg 21/75](#) – Review of the Numbering Conditions – Response to Consultation, Decision and Further Consultation

¹⁵ [ComReg 23/52](#) – Combatting Scam Calls and Texts - Consultation

¹⁶ [ComReg 24/24](#) - Combatting Scam Calls and Texts – Response to Consultation 23/52

- 24 While the four CLI-based interventions have been successful in protecting end users from calls with spoofed CLI, scammers continue to use, and now rely more on, methods other than CLI spoofing, such as the use of real numbers to carry out their activities. In more sophisticated “vishing”¹⁷ or “smishing” attacks, the telephone number is advertised online or is contained in the content of a scam e-mail or SMS message sent to end-users.
- 25 For the purposes of this consultation, the term “real number” refers to a number assigned by an operator to an end-user who then uses this number in an attempt to commit fraud against other end-users. None of the four voice interventions address scam calls using real numbers. While ComReg’s adoption of a fifth voice intervention, namely the Voice Firewall, targets all scam calls by analysing more than just the CLI, this intervention is unlikely to have a significant impact on scams that use real numbers. Therefore the assignment of real numbers by operators to scammers remains a matter of some concern.
- 26 Preventing scammers from being assigned real numbers is an important objective in combatting scam communications. While scammers have been creative in finding ways to scam, the physical location condition contributes to making it more difficult for them to be assigned numbers. However, to better understand how combatting nuisance communications can be improved, ComReg requires further feedback from operators on the implementation of the physical location condition, particularly where numbers have been inadvertently assigned to scammers. Understanding how scammers are being assigned real numbers is essential to combat their activities.
- 27 In support of the objective of preventing scammers from being assigned real numbers, and to ensure that operators have the means to comply with the numbering conditions in respect of the physical location condition, ComReg proposes that applicants for Geographic Numbers should be required to provide details of how they will comply with this condition. To that end, ComReg proposes to insert the following underlined text as new Section 7.2(9):

The applicant, or Sub Assignee, for Geographic Numbers shall provide written details with its application or notification of how it intends to meet the Rights of Use Conditions for such numbers as set out in Section 4.1(2) “A Geographic Number shall only be assigned to an end-user whose residential/business premises is physically located within the designated minimum numbering area (MNA) for that Geographic Number.”

¹⁷ Vishing (Voice Phishing): A voice-based phone scams designed to trick people into revealing personal, financial, or security information.

28 Moreover, applicants for Geographic Numbers should note the requirements of ComReg Decision D06/24 of ComReg 24/17¹⁸ “Emergency Caller Location Information - Response to Consultation and Decision” which sets out the obligations for fixed network providers to provide the ECAS operator with caller location information. Therefore, to highlight D06/24 in the context of the physical location condition, ComReg proposes to insert the following underlined text to the newly proposed Section 7.2(9);

(9) Furthermore, regarding identifying an Applicant’s residential/business premises address, Applicants for Geographic numbers should note the requirements of ComReg Decision D06/24 of ComReg 24/17¹⁹ which sets out inter-alia that “A provider of fixed line services shall provide the ECAS Operator with the Eircode linked to the fixed line number for each end-user of its services in the format and manner specified by the ECAS Operator”.

Q. 3 Do you agree with ComReg’s preliminary position to insert in the Numbering Conditions, additional eligibility criteria for Geographic Numbers and to insert text noting the requirement set out in D06/24 for assignees of Geographic Numbers to provide an Eircode for each end-user of its services, all of which are set out above? Please explain the basis for your response in full and provide supporting information.

¹⁸ [ComReg 24/17](#) “Emergency Caller Location Information - Response to Consultation and Decision”

¹⁹ [ibid](#)

5 Sub-Assignment and Transfer - Updates

Sub-Assignment - Issues Arising

- 29 Given the time elapsed since its introduction in 2024, ComReg now wishes to review the Sub-Assignment Process and consider whether it is fit for purpose.
- 30 In its Consultation 23/52²⁰, and in response to the surge in nuisance communications, ComReg proposed to amend the permitted types of number arrangements to enable better management of number use. In paragraph 6.100 of the consultation, ComReg described a practice of what it termed “irregular number provision” whereby an operator provided its assigned numbers to a second operator for use by the latter’s end users. Furthermore, in paragraph 4.139 of its Response to Consultation 23/52 (ComReg 24/24)²¹, ComReg noted that it continued to receive reports of scammers using numbers for which their Service Provider did not hold the rights of use. This, ComReg indicated, prevented proper oversight of operator number use and was proving an obstacle to combatting nuisance communications.
- 31 In ComReg 24/24, ComReg noted that the majority of respondents to the consultation had stressed that, what ComReg called irregular number provision, was a feature of the telecoms market and that ComReg should not seek to prevent this practice.
- 32 ComReg carefully considered these views and consequently adopted the Sub-Assignment Process as set out in Section 7.1(2) and Appendix 9 of the Numbering Conditions. This Sub-Assignment Process enabled ComReg to increase its oversight of number use while also enabling industry to retain its existing practice of a number holder providing those numbers to another operator for use by the latter’s end users. In addition, to support the objective of better oversight of number use, ComReg set out in Section 7.1(3) that “In providing services to its end-users, an undertaking shall only use numbers for which it solely, or jointly in the case of sub-assignment, holds the rights of use.”

²⁰ [ComReg 23/52](#) – Combatting scam calls and texts - Consultation

²¹ [ComReg 24/24](#) - Combatting scam calls and texts – Response to Consultation paragraph 4.139

- 33 Nevertheless, despite the introduction of the Sub-Assignment Process while also emphasising the need for improved Know Your Customer (“KYC”) by operators, ComReg continuously receives reports from end-user organisations regarding the use of real numbers for scam communications. Furthermore, while ComReg welcomes the engagement of some operators with the Sub-Assignment Process, there continues to be many others who provide numbers outside of the formal Sub-Assignment Process set out by ComReg. In this respect, ComReg will continue to monitor the use of numbers to ensure that operators who choose to sub-assign numbers shall do so in accordance with the Numbering Conditions.

Sub-Assignment of Non-Geographic Numbers (“NGN”)

- 34 As highlighted in our discussion above regarding Sub-Assignment, directly assigning numbers to operators provides ComReg with the optimum oversight of the operators using those numbers for their end users. However, and in response to industry submissions to Consultation 23/52, ComReg introduced a Sub-Assignment Process as an alternative means of providing oversight of number use. However, ComReg has identified potential compliance issues in relation to the Sub-Assignment Process and must now consider whether the added complexity in respect of the Sub-Assignment process is appropriate or necessary for certain classes of number.
- 35 One of the benefits of Sub-Assignment is that it enables the efficient use of numbers. For example, ComReg assigns Geographic numbers in blocks of 1,000, or 100 in areas where number conservation is more acute, and the ability of the Primary Assignee to sub-assign numbers from their assigned number block is an efficient use of that number block. However, the Sub-Assignment of NGNs, which are assigned on an individual basis, does not offer the same benefits while adding unnecessary complexity in overseeing the use of these numbers.
- 36 Furthermore, ComReg continues to permit the transfer of NGNs which makes Sub-Assignment an unnecessary complexity in overseeing the use of these numbers.
- 37 In view of the reasons set out above, ComReg proposes to prohibit the Sub-Assignment of NGNs and therefore proposes to insert the following underlined text in new Section 3.2(6);

(6) Holders shall not sub-assign 0818/1800 NGNs.

Q. 4 Do you agree with ComReg's proposal to prohibit the Sub-Assignment of 0818/1800 NGNs as described above? Please explain the basis for your response in full and provide supporting information.

Sub-Assignment and Transfer – Sender IDs

38 Section 5(2) of the Sender ID Rules and Registration²² sets out that the “Rights of use for a Sender ID may only be granted once a clear link from the applicant to the Sender ID has been established”. Therefore, and with the exception of a shared Sender ID²³, the design of ComReg's Sender ID Registry provides for the association of a Sender ID with a single SIDO. Consequently, it is not appropriate to permit the Sub-Assignment of a Sender ID that is uniquely associated with a particular SIDO. ComReg may permit the Transfer of a Sender ID in certain circumstances and subject to approval by ComReg. To that end, ComReg proposes to delete the text in Section 3.2(1) and insert the underlined text insert in Section 3.2 paragraph 2 and paragraph 4 as follows:

(1) “In the case of Sender ID, and unless ComReg otherwise consents, a Sender ID shall be activated by its holder (a) within 6 months of the date on which the right of use for the Sender ID was first granted to the holder; or (b) within one month of the date on which the right of use for the Sender ID was transferred.”
~~*or sub-assigned, as applicable.*~~

(4) “Holders shall not transfer or sub-assign any rights of use for the following classes of number: Directory Enquiry Access Short Codes, Customer Support Short Codes, Network-Use Short Codes, Harmonised Codes of Social Value, International Signalling Point Codes, National Signalling Point Codes, Mobile Network Codes, Carrier Short Codes and Number Portability Routing Prefixes. Sender IDs shall not be sub-assigned.”

Q. 5 Do you agree with ComReg's proposed text clarifying the prohibition of Sub-Assignment of Sender IDs as set out above? Please explain the basis for your response in full and provide supporting information.

²² [Sender ID Rules of Registration](#) - available for download on Sender ID Q&A webpage

²³ [ComReg 15/136R4](#) - Section 7.2(8)c

Sub-Assignee Permissions

39 ComReg provided a definition of Sub-Assignment in Appendix 12 of the Numbering Conditions as “*the assignment of numbering resources by a Primary-Assignee to a Sub-Assignee*”. Therefore, to align with this definition of Sub-Assignment, ComReg proposes to add the following underlined text and delete the text as indicated in Section 7.1(2) of the Numbering Conditions:

(2) “Undertakings are not encouraged to engage in sub-assignment of numbering resources, where sub-assignment means the assignment of numbering resources by ~~an~~ a Primary Assignee assignee to another entity that is not an end user. Transfer of numbers between undertakings is to be preferred. Where sub-assignment is necessary, it is subject to the prior notification of ComReg, and the consent of the Primary Assignee. The responsibilities regarding the compliance with the Numbering Conditions in relation to the assigned number(s) shall be shared between the Primary Assignee and the Sub-Assignee.”

40 In its function to manage the national numbering resource, ComReg must have sufficient oversight of the use of numbers. Unnecessary complexity in the ways in which numbers may be used only increases the difficulties for number management. Thus, in ComReg 24/24, ComReg set out a simple one-stage Sub-Assignment process by defining Sub-Assignment as the assignment of numbering resources by a Primary- Assignee to a Sub-Assignee. Furthermore, Appendix 12 of the Numbering Conditions sets out the meaning of “Primary Assignee”, as, in the context of sub-assignment, an undertaking which has been granted a right of use for any class or description of number by ComReg. Therefore these definitions, taken together, implicitly prohibit a Sub-Assignee from sub-assigning the numbers for which they jointly hold the rights of use. However, for clarity, ComReg proposes to insert the following underlined text in Section 7.1(2):

(2) For clarity, a Sub-Assignee may not further sub-assign the numbers which it jointly holds with the Primary Assignee.

Q. 6 Do you agree with ComReg’s proposal to insert text in the Numbering Conditions that clarifies the Sub-Assignment of numbers as set out above? Please explain the basis for your response in full and provide supporting information.

6 Review of Minimum Numbering Areas (“MNA”)

41 ComReg periodically reviews the concept of Minimum Numbering Areas (MNAs), a concept which, if removed from the Numbering Conditions, could result in improved efficiencies in number use as outlined below. ComReg’s last such review was in 2021²⁴ and, given ongoing network developments, it is possible that the MNA concept is no longer required, or at least in part. Consequently, ComReg now considers it timely to conduct a further review.



Figure 1: MNA boundaries for the 01 Area Code

²⁴ [ComReg 21/28](#) - Numbering Conditions of Use and Application process – Consultation – 30th March 2021

- 42 Appendix 12 of the Numbering Conditions sets out MNAs as one of the 106 geographic areas associated with Geographic Numbers, as defined in the “the National Numbering Plan”. The boundaries of Area Codes and MNAs are shown in ComReg Doc 03/147²⁵. An illustration of the MNAs contained in the 01 Dublin area code is provided in Figure 1. Furthermore, ComReg maintains a .kml map, which indicates MNA boundaries, available to operators on request via email to numapps@comreg.ie.
- 43 The concept of an MNA was originally adopted and defined in 1998 by the Office of the Director of Telecommunications Regulation (ODTR). MNAs correspond to the “charge group areas” used by the then Telecom Eireann and so the MNA boundaries (and Area Code boundaries) are based on Telecom Eireann’s exchange area boundaries at that time - i.e. the boundaries were defined by physical elements of the network such as ducts and pole runs. Therefore, as Exchange area boundaries evolve, and particularly as Eir continues to modernise its network it is prudent to consider whether there are any benefits in maintaining MNAs, noting that their removal would not require any number changes. Furthermore, and as mentioned earlier, MNA removal could result in improved efficiencies in number use as an operator could, for example, pool its assigned numbers for use across all the MNAs within an Area Code rather than being restricted by the more granular MNA approach.
- 44 In Consultation 21/28 on the Numbering Conditions, ComReg did not propose any changes to the geographic boundary for Geographic Numbers at that time. Instead, ComReg indicated it would welcome respondents’ views on the future relevance of the MNA concept. In its Response to Consultation²⁶, ComReg remained of the view that the geographic boundary for Geographic Numbers should remain at MNA level. However, ComReg also indicated that it had no objection in principle to geographic boundaries for Geographic Numbers being enlarged and would monitor this issue and engage with industry, to ensure that appropriate geographic boundaries are adopted.
- 45 In recent times, operators have highlighted customer demand to be able to retain their Geographic Number when moving their business or residential premises within an area code, to be referred to as “location porting” for the purposes of this consultation. Removal of the MNA concept would facilitate such location porting.

²⁵ [ComReg 03/147](#) - Geographic Telecommunications Numbering Areas

²⁶ [ComReg 21/75](#): Review of the Numbering Conditions and Application Process – Response to Consultation, Decision and Further Consultation, 19 July 2022

- 46 Therefore, given the potential benefits outlined, ComReg wishes to again explore the possibility of removing the MNA concept. Notwithstanding any possible technical issues, ComReg considers that the cessation of MNAs could be implemented on a phased basis. This might initially remove the MNA concept in certain area codes where significant benefits could be realised. For example, large population MNAs such as Dublin North, Central and South, which are all within the 01 Area Code, would likely benefit from a removal of MNAs, facilitating the possibility of location porting. Should ComReg adopt the cessation of the MNA concept in some or all the State's Area Codes, it will engage bilaterally with Fixed line operators to further its understanding of the process for implementation.
- 47 Section 4.1(3) of the Numbering Conditions set out that "An end-user moving premises within an MNA may retain its assigned number if the holder is prepared to support this". Therefore location porting within an MNA is permitted if the number holder is prepared to support it. To take account of the possible removal of the MNA concept in some or all Area Codes, and noting that location porting also includes the possibility of a port of the number to another operator, ComReg proposes to add the underlined text in Section 4.1(3) as follows;
- "(3) An end-user moving premises within an MNA, or Area Code if the MNA concept has been removed in that Area Code, may retain its assigned number if the holder, or Recipient Operator in the case of a port, is prepared to support this".*
- 48 In the event of removal of some or all MNAs and at the appropriate time, ComReg would update the numbering plan and the Numbering Conditions.

Q. 7 Do you agree that the MNA concept may now be removed in some or all of the State's Area Codes and that ComReg should update the Numbering Conditions accordingly? Please explain the basis for your response in full and provide supporting information, particularly on what tasks are required to carry out the removal.

7 Mobile Numbering Eligibility Criteria

49 Section 7.2 of the Numbering Conditions sets out the eligibility criteria for Mobile Numbers and MNCs. It states that *“Mobile Numbers and MNCs shall only be granted to MNOs and MVNOs, to OGCIO²⁷ for Public Protection and Disaster Relief (PPDR) services, and to OTT Service Providers, provided the OTT Service Provider qualifies as an ECS, and the OTT Service Provider has a contract with an Irish MNO to access its network. A right of use for one MNC shall be granted upon first application and the basis for any request for an additional right of use for an MNC must be fully set out”*.

50 This latest review of the Numbering Conditions considers new eligibility criteria for private (non-public) mobile networks seeking Mobile Network Codes (MNCs) and amended eligibility criteria for OTT Service providers.

Eligibility Criteria for providers of Private Mobile Networks

51 Section 5.7 of the Numbering Conditions and Application Process sets out the Rights of Use conditions for MNCs. MNCs *“shall be 2-digit short codes in the range 01 – 99 incl. and their structure and use shall otherwise conform with ITU-T Recommendation E.212²⁸.”*

52 The MNC serves two core functions:

- The Mobile Country Code (MCC) and MNC are the two constituent parts of the PLMN-ID (Public Land Mobile Network Identifier). The PLMN-ID is broadcast by base stations so that devices can recognise and connect to the correct mobile network. The MCC assigned to Ireland by the ITU is “272”.
- The MCC, MNC and Mobile Subscription Identification Number (MSIN) make up the 15-digit International Mobile Subscription Identity (IMSI). The IMSI enables:
 - Subscriber Identification and authentication on the customer’s “home network”;
 - When roaming, the IMSI tells the “visited network” which “home network” to contact to verify credentials to allow access to voice, SMS and data services provided by the “visited network”

The structure of the IMSI and PLMN-ID are set out below:

²⁷ Office of the Government Chief Information Officer

²⁸ [ITU-T Recommendation E.212](#) : The international identification plan for public networks and subscriptions

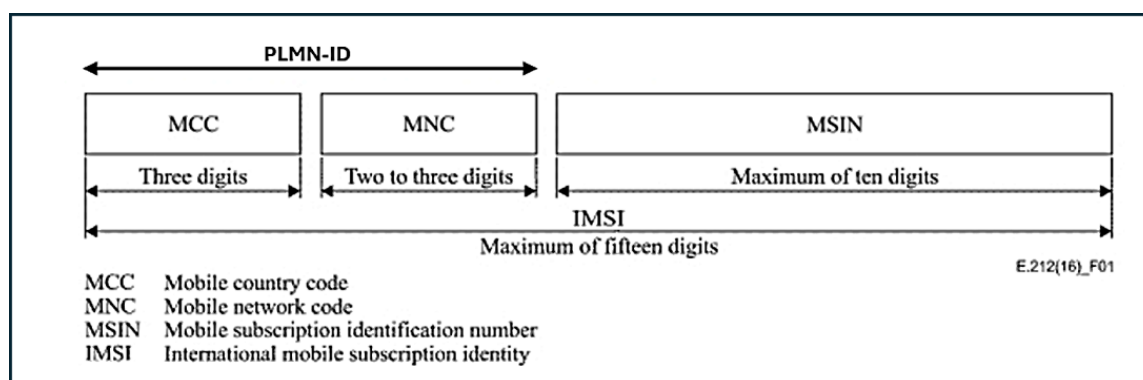


Figure 2: source ITU-T Recommendation E.212 (modification by ComReg to include PLMN-ID)

Similar functions are also required for providers of some types of private mobile networks to broadcast to certain devices. Roaming is not a feature that is proposed to be covered by this policy proposal on MNCs for private networks. Therefore, they are for internal private network use only.

Preliminary Consultation

53 On 11 July 2025, ComReg published a Consultation Document on Proposed licensing regimes for Private Mobile Radio (PMR) and Low & Medium Power Wireless Broadband Systems (WBB LMP) (ComReg 25/46). The consultation recognised the growing demand for a licensing framework to authorise the use of private broadband networks in areas such as transport, industry, and manufacturing. ComReg understood from analysing licensing frameworks in other countries that some spectrum licensees may require the use of a MNC for their private mobile network. ComReg indicated its plans to review its Numbering Conditions in 2026 but took the opportunity to seek preliminary views on this matter in ComReg 25/46.

54 ComReg 25/46 referred to ECC Recommendation (17) 02²⁹ which sets out a number of options for private (non-public) mobile networks regarding the use of MNCs. These include:

- the use of mobile country code (MCC) 999 for standalone non-public networks (SNPNs)³⁰;
- the allocation of one or more MNCs from the geographic MCC for shared use without direct assignment for SNPNs; and
- the assignment of a single MNC for simultaneous use by multiple networks for shared use.

²⁹ ECC/REC/(17)02 of 31 May 2017 on harmonised European Management and Assignment Principles for E.212 Mobile Network Codes (MNCs)

³⁰ Which includes also SNPNs with shared RAN (see [ECC Report 337](#))

- 55 ComReg stated that it could consider these options, and perhaps others, in the next review of the Numbering Conditions.
- 56 Only one submission was received on this particular matter in response to ComReg 25/46. The DECT Forum stated that it did not require a MNC and that an MNC should not be obligatory under a licence. In its Response to Consultation, ComReg stated that it had observed in the initial consultation that some licensees might require use of a MNC for their private mobile networks, and indicated its plans to consult on options for the use of MNCs, among other things, as part of a review of its Numbering Conditions. As such, ComReg did not propose to make MNCs obligatory under a WBB LMP licence. Rather, ComReg's observations merely related to cases where WBB Licensees might themselves require use of MNCs. ComReg then clarified that it did not propose to include a MNC obligation as a licence condition.

ComReg's preliminary view on MNCs for private mobile networks

- 57 MNCs are a very scarce resource. ITU-T Recommendation E.212 specifies that a 2-digit or 3-digit MNC is possible. In some parts of the world, MNCs are implemented in a 3-digit format, meaning there are 1000 MNCs (000-999) available for assignment under each geographic MCC. In Ireland, and indeed right across Europe, MNCs are implemented in a 2-digit format, meaning there are only 100 MNCs (00-99) available for assignment under each geographic MCC. ComReg must therefore manage this resource very carefully and it does not propose, at this point, to consider a solution that would make geographic MNCs under MCC 272, available for use on private mobile networks.
- 58 As no further views were proposed in the preliminary consultation, ComReg considers that MCC 999 is a workable solution. Appendix III of ITU-T Recommendation E.212 sets out the principles for shared use of MCC 999 for internal use within a private network. Although not an integral part of the Recommendation itself, as resources are not formally assigned, this approach offers a good solution for geographically separated private mobile networks.
- 59 It should be noted that MNCs under MCC 999:
- are not subject to assignment and therefore may not be globally unique;
 - only have significance within one private mobile network;
 - require no interaction with ITU for using a MNC value under MCC 999 for internal use within a private network;
 - are not routable between networks; and
 - shall not be used for roaming.

- 60 To that end, ComReg proposes the following text for inclusion in Section 7.2(2) of the Numbering Conditions:

Providers of private (non-public) mobile networks who require an MNC for the operation of their networks may use MNCs under MCC 999 as designated by the ITU-T for internal use within a private network. In line with ECC Recommendation (17) 02, the use of MCC 999 with 3-digit MNCs (and not 2-digit MNCs) is recommended to reduce the risk of unwanted interference”

Q. 8 Do you agree with ComReg’s preliminary position to amend the eligibility criteria for Mobile Numbers and MNCs regarding the use of MNCs under MCC 999 for private mobile networks as set out above?

Eligibility Criteria for Mobile Numbers and MNCs for OTT Service Providers

- 61 ComReg has recently received requests from some operators for clarification regarding the eligibility of OTT Service Providers for mobile numbering resources. As noted earlier with regard to Numbering Eligibility Criteria, Section 7.2 of the Numbering Conditions sets out that “*Mobile Numbers and MNCs shall only be granted to MNOs and MVNOs, to OGCI/O for Public Protection and Disaster Relief (PPDR) services, and to OTT Service Providers, provided the OTT Service Provider qualifies as an ECS, and the OTT Service Provider has a contract with an Irish MNO to access its network*”. The eligibility criteria concerning OTT Service Providers was informed by the Consultant’s report (Document 18/03a)³¹ which was published at the same time as ComReg’s Consultation 18/03³², and provides for the following in Section 5.7.2 (*OTT Service Provider Eligibility for E.164 Mobile Numbers*); “*Therefore, we recommend that ComReg should consider expanding the eligibility for mobile numbers to OTT providers that have a contract with an MNO that allows their customers to roam on to the MNO’s network.*”. Thus, an OTT Service Provider providing such a mobile service is an MVNO and so may be eligible for mobile numbering resources.

³¹ [Document 18/03a](#) - Review of Mobile Numbering Resources – Consultant’s Report

³² [ComReg 18/03](#) - Review of Mobile Numbering Promoting Innovation and Facilitating New Services - Consultation

62 Therefore, to clarify the eligibility of OTT Service Providers for mobile resources, ComReg proposes to add underlined text, delete text and format text in Section 7.2 as set out below;

“Rights of use for Mobile Numbers and MNCs shall only be granted to the following;

- i. MNOs;*
- ii. MVNOs, including OTT Service Providers that qualify as an ECS and have a contract with an Irish MNO to access its network and so enable their customers to roam on to the MNO’s network; and ~~to~~*
- iii. OGCIO for Public Protection and Disaster Relief (PPDR) services.*

~~*and to OTT Service Providers, provided the OTT Service Provider qualifies as an ECS, and the OTT Service Provider has a contract with an Irish MNO to access its network.*~~

A right of use for one MNC shall be granted upon first application and the basis for any request for an additional right of use for an MNC must be fully set out.”

Q. 9 Do you agree with ComReg’s proposal to clarify the eligibility criteria for OTTs to be assigned mobile resources by amending the text as set out above?

8 Mobile Numbering Plan Management

- 63 Under the Communications Regulation Act 2002, as amended, ComReg has the statutory function to manage the national numbering resource with the corresponding objective to ensure its efficient management and use. A key part of this function is to ensure that a sufficient quantity of numbers are available, now and in the future, to meet demand from providers of publicly available electronic communications services and networks.
- 64 One of ComReg's objectives, in managing the numbering resource, is to avoid the need for number changes where possible. Number changes are generally disruptive and very costly, not only to the immediate telecoms industry and its customers but also to the wider economy. MSPs have, to date, been assigned 25,712,000 mobile subscriber numbers in the 083, 085, 086, 087 and 089 ranges ("five mobile ranges") while only 10,732,236³³ mobile subscriptions have been recorded. This is equivalent to approximately 42% use by MSPs of the five mobile ranges. While recognising that many mobile numbers may, for example, be in quarantine and unavailable at a particular time, the 42% generally indicates low efficiency in mobile number use.
- 65 Furthermore, ComReg notes that 4,276,911³⁴ of mobile subscriptions, which is approximately 40% of the total, are used for machine to machine (M2M) services. In ComReg 18/46³⁵, ComReg introduced the new mobile range 088 for M2M. Notwithstanding ComReg's acceptance that mobile numbers assigned for M2M up to that time could remain in use, the new 088 range allowed more efficient use of the five mobile ranges.

³³ Section 5 "Mobile Market" [Quarterly-Key-Data-Report-Q3-2025.pdf](#)

³⁴ Ibid

³⁵ [ComReg 18/46](#) Review of Mobile Numbering – Response to Consultation

- 66 In 2016, ComReg published an Information Notice³⁶ and associated consultant's report³⁷ on the conservation of Geographic and Mobile Numbers. In Section 2.2 of ComReg 16/20, ComReg set out the measures recommended by the consultants to conserve numbers in the five mobile ranges to meet future demand. Furthermore, in 2018, ComReg's Review of Mobile Numbering (Section 3.3.2 (53) and Section 3.3.2 (52))³⁸ identified 082 and 084 as potential new mobile ranges. However, notwithstanding the adoption of such conservation measures, or the introduction of new P2P mobile ranges, effective number management requires that ComReg, with input from industry, sets out a long term plan to expand the five mobile ranges even if this might be considered an unlikely need.
- 67 This expansion of the five mobile ranges would be carried out by migrating the existing seven digit mobile subscriber numbers to eight digit numbers, thereby increasing the capacity in the five mobile ranges by a factor of 10. This migration would be implemented by adding a new leading digit to all subscriber numbers. To reduce the risk of a number clash during the migration, existing subscriber numbers should not have a leading digit corresponding to the leading digit needed for expansion. To that end, ComReg had previously identified 8 and 9 as leading digits in the expansion of the five mobile ranges.
- 69 In March 2025, following an analysis of submissions to its request for information to MSPs, ComReg identified a significant quantity of subscriber numbers had leading digits 8 and 9. These digits were previously identified for use in expanding each of the 085, 086 and 087 ranges in the future. A much smaller quantity of numbers with leading digit 5 was found to be in use. Therefore, it was no longer practical to retain the digits 8 and 9 for expansion. Notwithstanding the assignment of subscribers numbers with leading digit 5, discussions on an alternative expansion plan, including the potential use of 5 as the leading digit, is necessary.
- 70 Following its findings on mobile number use, ComReg wrote to MSPs in September 2025, indicating that it wished to explore alternative plans for mobile range expansion, such as the potential use of the leading digit 5 for this purpose across all mobile numbering ranges. While ComReg noted that it has reserved the leading digit 5 in each of the five mobile ranges for use in accessing mobile mailboxes, it highlighted the following;
- (i) The use of leading digit 5 would be an attractive solution in expanding the five mobile ranges as it would enable a common leading expansion digit across all mobile subscribers thereby making any communications campaign for any future expansion easier for end-users to understand.

³⁶ [ComReg 16/20](#)

³⁷ [ComReg 16/20a](#)

³⁸ [ComReg 18/46](#)

- (ii) It is not clear on the extent of use by subscribers of the digit 5 in accessing mailboxes as, for example, the use of 171, as a voicemail access short code, may be more prevalent. The extent of its use would have to be explored.
- (iii) At present ComReg is not aware of any further options that would support the expansion of the mobile ranges.

71 ComReg also requested that MSPs consider and suggest ideas on how to expand the mobile number range, including the use of digit 5 and stated that it would explore this issue further in its consultation on the Numbering Conditions. ComReg received a limited number of responses from MSPs to its request and now offers MSPs a further opportunity to provide further feedback.

72 ComReg understands that the potential option to use leading digit 5 will require careful consideration of the current use of this digit and whether its alternative use as an expansion digit is technically and operationally feasible. Furthermore, it requests feedback on any potential impact that a suggested option might have in relation to nuisance communications. ComReg suggests that, if as a result of this consultation, the use of digit 5, or any other option highlighted by MSPs, is considered feasible, ComReg would engage bilaterally with MSPs with a view to determining the optimal solution.

73 Notwithstanding the above, it is important that the existing five mobile ranges are used efficiently to reduce any risk of number exhaustion, particularly as the implementation of any option for expanding the ranges will take time and is not without disruption or cost.

74 ComReg therefore does not propose to make any changes at this time to the Numbering Conditions in respect of the long term plan for expansion of the five mobile ranges but does intend to engage bilaterally with MSPs to determine the most appropriate course of action.

Q. 10 Do you agree with ComReg's assessment on the need for a long term plan to expand the five mobile ranges and on the proposed use of the leading digit 5 for this purpose? Please explain the basis for your response in full and provide supporting information.

9 Leasing of Global Titles (“GT”) created using Irish Mobile Numbering Resources

Introduction

- 75 Mobile Service Providers (MSPs) use Global Titles (GTs) as routing addresses for the exchange of signalling messages between 2G and 3G SS7 based mobile networks to support their provision of mobile services. They are crucial for roaming, SMS delivery, and subscriber authentication. GTs enable communication between mobile networks worldwide, ensuring services work while users are roaming. It is expected that the SS7 protocol will continue to be used across the global mobile ecosystem until at least 2035.
- 76 GT Leasing is the practice whereby an MSP leases GTs to third parties such as SMS aggregators or smaller telecoms providers. GT leasing facilitates access to SS7 networks for smaller market players which they consider to be a more direct and cost-effective route to market. However, there are risks associated with GT Leasing, including exploitation of the practice by bad actors for *inter-alia* CLI spoofing and phishing in SMS communications. If not properly managed, leased GTs can be misused, causing consumer harm and damaging the reputation of legitimate GT owners. While ComReg is not aware of any reports of the misuse of GTs using Irish mobile numbers, such reports from other NRAs as a result of GT leasing means the potential for misuse of Irish mobile numbers exists.
- 77 In April 2025, the UK regulator Ofcom banned the practice of GT leasing. Ofcom identified evidence that some GTs on UK networks are a source of malicious signalling traffic affecting mobile networks and their subscribers. This raises network security, privacy, reputation and fraud risks. ComReg is concerned that misuse could take place and that preventative measures must be considered.
- 78 In May 2025, ComReg contacted Irish MSPs with mobile number assignments concerning the leasing of GTs, outlining that it planned to consult on the matter in the next review of its Numbering Conditions. While noting that the outcome of its consultation could not be prejudged, ComReg set out its preliminary view that, given the risk of consumer harm and the reputational risk for the industry in Ireland, it is likely to forbid the leasing of GTs created using Irish mobile numbering resources.

GSMA - Global Title Leasing Security Risks

- 79 In 2023 the GSMA, a global organisation representing the unified interests of over 1,000 mobile operators and companies, published³⁹ its response to concerns about the unauthorised use of leased GTs. The GSMA “Global Title Leasing Code of Conduct” usefully explains how bad actors can exploit the SS7 vulnerabilities.
- 80 SS7 was designed when only national telecom operators had network access. SS7 is built on trust where both parties know and trust each other. The reality today is that thousands of operators worldwide have SS7 access. GT Leasing effectively gives a lessee access to the global SS7 signalling network.
- 81 GT Leasing ultimately weakens the tight and heretofore trusted connections between traditional operators. Although the initial intention by the lessee might be legitimate, the trust within that telecommunication ecosystem is diluted immediately. Leased GTs can provide SS7 access to unvetted third parties, enabling harmful behaviour that compromises subscriber privacy and telecom network integrity.
- 82 Once that trust is diluted the network operator can easily lose sight of who has access to query information from their GT. A lessee can sub-lease their GT without the network operator’s knowledge. It is therefore inevitable that bad actors will ultimately gain access to a leased GT. This is when the SS7 protocol is then used by bad actors.
- 83 SS7 does not have encryption or authentication and can therefore be easily exploited. Misuse of leased GTs can allow bad actors to obtain geolocation information and interception or redirection of SMS messages.
- 84 The GSMA strongly recommends that its members do not lease GTs.

³⁹ [GSMA website](#) – download the Global Title Leasing Code of Conduct (PRD FS.52)

ComReg's Proposed Change

85 As noted earlier, ComReg wrote to MSPs in May 2025 setting out its preliminary position that it is likely to adopt a similar policy approach to the misuse of GTs as adopted in the UK, which was to ban the leasing of GTs created using Irish mobile numbers. ComReg did not receive any responses from MSPs challenging its preliminary position. Therefore, to address the risks and the potential for harm to consumers and industry due to GT leasing, ComReg proposes the following:

- (iv) Prohibit the leasing of GTs to third parties by operators that hold Irish mobile numbers;
- (v) Prohibit third parties from creating or using GTs from transferred or sub-assigned Irish mobile numbers;
- (vi) Prohibit the creation of GTs from unassigned Irish mobile numbers. Regulation 79(4) of the 2022 Regulations states that an *“undertaking commits an offence if the undertaking assigns to locations, terminals, persons or functions on public communications networks numbers from the National Numbering Scheme that the regulator has not specifically allocated to the undertaking in connection with the provision of publicly available electronic communications services”*. Thus, the use of unassigned Irish mobile numbers for creating GTs is forbidden.
- (vii) Update the Numbering Conditions to reflect these proposals by carrying out the following;

Insert the following underlined text as paragraph 3 in Section 4.5 “Mobile Numbers” RoU conditions;

“(3) Global Titles (GT) created using Irish mobile numbers may not (a) be leased by the Primary Assignee of the mobile number to a third party or (b) be created by any holder of the mobile number other than the Primary Assignee.”

- (viii) Furthermore, ComReg will allow 12 months from the publication of its decision for existing leased GTs holders, if any, to make alternative arrangements.

86 ComReg will engage bilaterally with MSPs to address the changeover of existing GT lessees, if any.

Q. 11 Do you agree with ComReg's proposal to forbid the leasing of GTs using Irish mobile numbers? Please explain the basis for your response in full and provide supporting information.

10 Number Management

Submitted Applications

- 87 In carrying out its number management function, ComReg constantly seeks improved ways of assigning and monitoring the use of numbers. ComReg also pursues better oversight and reporting on number use which would have particular benefits in combatting nuisance communications.
- 88 In Consultation 23/52, ComReg sought the views of respondents on its assessment of future number management. One of these topics highlighted by ComReg was the potential for automatic number assignment. In paragraph 4.160 (i) of ComReg 24/24, ComReg noted that respondents indicated a preference for an automated number assignment process.
- 89 Section 7.1(16) of the Numbering Conditions sets out the number application and Sub-Assignment notification processes. These processes are broken down below according to their level of automation;
- i. Automated; Applications for 1800 Freephone and 0818 Standard Rate numbers must be submitted through the Individual Number Assignment (“INA”) system. The INA uses the Fixed Number Portability (“FNP”) system provided by PortingXS which integrates with the ComReg numbering database to ensure applicants are validated. All applications are carried out online and assignments automatically issued to operators. Furthermore, the PortingXS system automatically submits new assignments to network operators for automatic implementation of the number on networks.
 - ii. Semi-Automated; Applications for Sender IDs are made online on ComReg’s Sender ID Registry. Aggregators that wish to originate or transit SMS traffic with Sender IDs must also register on this system. While ComReg manually validates all applications, applicants enter all required information online. Operators download the Registry data for implementation on their networks.
 - iii. Manual (Number Assignment or Transfer Applications); Other than 1800 Freephone , 0818 Standard Rate and Sender IDs, applications are subject to a manual process. This process entails an applicant submitting an application form to ComReg by email. ComReg then reviews the application and, if successful, selects and processes the appropriate numbers that are free for assignment or, in the case of Transfer, approves the Transfer application. ComReg then issues the schedule of number assignments by email.

- iv. Manual (Sub-Assignment Notification); The Sub-Assignment notification process entails an applicant submitting a completed notification form to ComReg by email. ComReg is not required to approve the notified Sub-Assignment although it can only be successful if the associated numbering conditions are met.

90 In considering improved ways of assigning and monitoring the use of numbers, ComReg notes that there is significant Sub-Assignment activity in the market in terms of the number of Sub-Assignees and their associated Sub-Assigned numbers. Therefore, to enable better oversight of number use by providing faster and easier access to Sub-Assignment information, ComReg and Industry would particularly benefit from an automatic system which would enable easy upload of notifications by Primary and Sub-Assignees. In particular, such better oversight would assist ComReg in combatting nuisance communications in cases where sub-assigned numbers have been assigned to bad actors.

Next Steps

91 In ComReg 24/24, ComReg introduced five voice and one SMS based interventions to combat Nuisance Communications. These interventions have been successful in combatting scam activity using Irish numbers including SMS. Nevertheless, the ongoing use of real numbers by bad actors, as described above in Section 5 on Sub-Assignment, means that the objectives of Sub-Assignment, particularly the need for better oversight of number use, need to be achieved to enable improvements in the protection of end-users. Therefore, ComReg will explore the potential for an automated number management system, particularly to support easier submissions of Sub-Assignment notifications by industry and to improve the monitoring of all number types and reporting of Sub-Assignment notifications. This would provide ComReg with better oversight of the use of numbers.

Q. 12 Do you agree with ComReg's assessment on the need for automated number management systems, particularly in the case of Sub-Assignment? Please explain the basis for your response in full and provide supporting information.

11 Administrative Updates

Rights of Use – Change of Holder Name

92 Section 3.2(4) of the Numbering Conditions sets out that certain classes of numbers shall not be transferred or sub-assigned. However, in some cases, ComReg receives a request for a change of operator name. To highlight that these number resources may be assigned under the new name, ComReg proposes to include the following underlined additional clarification text;

“Holders shall not transfer or sub-assign any rights of use for the following classes of number: Directory Enquiry Access Short Codes, Customer Support Short Codes, Network- Use Short Codes, Harmonised Codes of Social Value, International Signalling Point Codes, National Signalling Point Codes, Mobile Network Codes, Carrier Short Codes and Number Portability Routing Prefixes. Sender IDs shall not be sub-assigned. For clarity, where there is an administrative change in the name of a Holder, ComReg will amend the assignment name for that holder’s numbers. Such a name change does not constitute a Transfer or Sub-Assignment of numbers”.

Number Utilisation – Updates to Appendices 4 and 5

93 Section 7.1(11) of the Numbering Conditions “General Application Criteria” provides that “Any undertaking which has been granted and which currently holds rights of use for Geographic Numbers in a specific MNA shall not be granted any new rights of use for Geographic Numbers in that same MNA unless ComReg is first satisfied that the undertaking is utilising, at a minimum, 65% of its currently assigned stock of Geographic Numbers for that same MNA”. In Section 7.1(12) of the Numbering Conditions, the utilisation threshold set out for mobile numbers is 45%.

94 To determine the utilisation of such numbers, Section 7.1(16)(c) sets out that applicants for Geographic Numbers must complete the form in Appendix 4, which allows the applicant to indicate the status of Geographic number assignments already granted to them. Therefore Appendix 4 should include a column to take account of Sub-Assignment in calculating the utilisation of numbers assigned to the Applicant. To that end ComReg proposes to update Appendix 4 “Geographic Numbers Held by the Applicant” with the additional column as indicated in the draft Numbering Conditions. Similarly for mobile numbers, and with reference to the threshold of mobile number use of 45% as set out in Section 7.1(12) of the Numbering Conditions, ComReg proposes to update Appendix 5 “Mobile Numbers Held by the Applicant” to take account of Sub-Assignment in calculating the utilisation of mobile numbers assigned to the Applicant. Furthermore, to allow for Sub-Assignment in the calculation of Geographic and Mobile number use, ComReg proposes to update Section 7.1(14) “General Application Criteria” as follows;

Total Numbers active and in use

Total numbers assigned - (Total ported out numbers + Total quarantined numbers + Total Sub-Assigned numbers)

1850 and 1890 NGNs

95 In accordance with decision D15/18⁴⁰ as amended and D05/23⁴¹ all numbers in the 1850 and 1890 number ranges are withdrawn. Therefore, the Numbering Conditions will be updated accordingly.

Management of STN-SR number list

96 As set out in Section 1(4) of the Numbering Conditions, ComReg manages the Do Not Originate (“DNO”) List, Protected (“PN”) List, the Mobile Station Roaming Number (“MSRN”) List and the SMS Sender ID Registry. These management functions were provided for in ComReg’s Decision D15/24 of ComReg 24/24 on its update of the Numbering Conditions in respect of the Nuisance Communications interventions.

⁴⁰ [ComReg 18/106 and Decision D15/18](#): Review of Non-Geographic Numbers - Response to Consultation 18/65 and Decision

⁴¹ [ComReg 23/68](#) - Review of Utility Non-Geographic Numbers Extension - Response to Consultation 23/27 and D05/23

97 Following testing of the Mobile CLI Call Blocking intervention, which was set out in ComReg's Decision D12/24, MSPs highlighted the need for a list of Session Transfer Number for SRVCC ("STN-SR") numbers in use by each MSP. The STN-SR numbers are used for routing and enabling seamless continuity of voice calls across networks. Following discussion with industry at the NCIF in July 2024, it was agreed that ComReg would manage such a list and has been doing so since July 2024. Therefore, ComReg will add the following underlined text to Section 1(4) of the Numbering Conditions

(4) As set out in its Response to Consultation (ComReg 24/24) and Decision D15/24 on Nuisance Communications, and in agreement with an Industry request in respect of Session Transfer Number for SRVCC ("STN-SR")⁴² numbers, ComReg supports industry by managing the following:

- (i). Do Not Originate ("DNO") List*
- (ii). Protected ("PN") List*
- (iii). Mobile Station Roaming Number ("MSRN") List*
- (iv). SMS Sender ID Registry⁴³*
- (v). Session Transfer Number for SRVCC ("STN-SR") list*

⁴² STN-SR numbers are used for routing and enabling seamless continuity of voice calls across networks.

⁴³ "Sender ID Owners ("SIDO") should be aware of detailed documentation in relation to the SMS Sender ID Registry such as for example the Rules of Registration, available on the SMS Sender ID Registry section of the ComReg website, and updated from time to time.

12 Making a Submission and Next Steps

98 ComReg invites and welcomes the views of all interested parties and will consider all information submitted to it on foot of this consultation.

99 The period for submitting responses to this consultation will run until 5pm on Thursday 02 July 2026.

100 ComReg requests that all responses reference the relevant question numbers and/or paragraph numbers from this document. ComReg also requests that respondents set out the rationale for their submitted views, to include any supporting information.

101 ComReg will review all responses received and will, in due course, publish its Response to Consultation together with the updated Numbering Conditions of Use and Application Process document. ComReg will also publish all responses to this consultation in due course in accordance with its policy. Respondents are therefore asked to provide confidential and non-confidential versions of any document in respect of which any confidentiality is claimed (e.g. commercially sensitive information). In this respect, please see ComReg's Consultation Procedures (ComReg 11/34)⁴⁴ and Guidelines on the Treatment of Confidential Information (ComReg 05/24)⁴⁵.

102 ComReg requests that responses to this consultation be submitted electronically and in an unprotected format in order that they can be appended into ComReg's submissions document for electronic publication.

103 All responses to this consultation should be clearly marked:- "Reference: Consultation 26/35 "Review of the Numbering Conditions of Use and Application Process", and sent by e-mail to arrive on or before 5pm, on Thursday 02 July 2026, to:

Conor Mahon
Commission for Communications Regulation
Email: marketframeworkconsult@comreg.ie

⁴⁴ [ComReg 11/34](#)

⁴⁵ [ComReg 05/24](#)

13 Consultation Questions

- Q. 1 Do you agree with ComReg’s proposal to amend the SMS Sender ID conditions as set out above? Please explain the basis for your response in full and provide supporting information..... 14
- Q. 2 Do you agree with ComReg’s proposal to provide conditions for SMS Originating Identification as set out above? Please explain the basis for your response in full and provide supporting information..... 16
- Q. 3 Do you agree with ComReg’s preliminary position to insert in the Numbering Conditions, additional eligibility criteria for Geographic Numbers and to insert text noting the requirement set out in D06/24 for assignees of Geographic Numbers to provide an Eircode for each end-user of its services, all of which are set out above? Please explain the basis for your response in full and provide supporting information. 19
- Q. 4 Do you agree with ComReg’s proposal to prohibit the Sub-Assignment of 0818/1800 NGNs as described above? Please explain the basis for your response in full and provide supporting information. 22
- Q. 5 Do you agree with ComReg’s proposed text clarifying the prohibition of Sub-Assignment of Sender IDs as set out above? Please explain the basis for your response in full and provide supporting information. 22
- Q. 6 Do you agree with ComReg’s proposal to insert text in the Numbering Conditions that clarifies the Sub-Assignment of numbers as set out above? Please explain the basis for your response in full and provide supporting information..... 23
- Q. 7 Do you agree that the MNA concept may now be removed in some or all of the State’s Area Codes and that ComReg should update the Numbering Conditions accordingly? Please explain the basis for your response in full and provide supporting information, particularly on what tasks are required to carry out the removal..... 26
- Q. 8 Do you agree with ComReg’s preliminary position to amend the eligibility criteria for Mobile Numbers and MNCs regarding the use of MNCs under MCC 999 for private mobile networks as set out above? 30
- Q. 9 Do you agree with ComReg’s proposal to clarify the eligibility criteria for OTTs to be assigned mobile resources by amending the text as set out above? 31
- Q. 10 Do you agree with ComReg’s assessment on the need for a long term plan to expand the five mobile ranges and on the proposed use of the leading

digit 5 for this purpose? Please explain the basis for your response in full and provide supporting information.....34

Q. 11 Do you agree with ComReg’s proposal to forbid the leasing of GTs using Irish mobile numbers? Please explain the basis for your response in full and provide supporting information.....38

Q. 12 Do you agree with ComReg’s assessment on the need for automated number management systems, particularly in the case of Sub-Assignment? Please explain the basis for your response in full and provide supporting information.....40

Annex: 1 Legal Basis

ComReg manages the national numbering resource under the Communications Regulation Act 2002, as amended (“2002 Act”) and S.I. No. 444 of 2022, the European Union (Electronic Communications Code) Regulations 2022 (the 2022 Regulations”) which transposes 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”).

ComReg’s key objectives are to ensure the efficient management and use of numbers and to promote competition, to contribute to the development of the internal market, and to promote the interests of users⁴⁶. ComReg must take all reasonable measures to achieve those objectives.

These include measures to ensure no distortion or restriction of competition, to encourage efficient investment in infrastructure and to promote innovation, and to encourage the efficient use and effective management of numbers⁴⁷. Measures must be proportionate⁴⁸, must have regard to international developments⁴⁹, and should not favour particular technologies or services⁵⁰.

In pursuit of its objectives as outlined above ComReg must apply objective, transparent, non-discriminatory and proportionate regulatory principles. These include: promoting regulatory predictability; ensuring that there is no discrimination in the treatment of comparable undertakings; safeguarding competition; promoting efficient investment and innovation; taking due account of the variety of conditions relating to competition and consumers that exist in the various geographic areas within the State, and imposing ex ante regulatory obligations only where there is no effective and sustainable competition.

Regulation 6(1) of the 2022 Regulations requires that any undertaking, intending to provide an electronic communications network or service, must first notify ComReg. The undertaking is thereby deemed authorised to provide the network or service concerned, subject to such conditions as may be specified by ComReg. Regulation 8 of the 2022 Regulations mandates that ComReg “shall ... specify conditions to be attached to a general authorisation only as are listed in Parts A, B and C of Schedule 1.”

Regulations 80(1) and (2) of the 2022 Regulations provide that ComReg may grant a right of use for any class or description of number to any to any undertaking for the provision of electronic communications networks or services covered by a general

⁴⁶ Section 12(1)(a) of the 2002 Act as amended.

⁴⁷ Section 12(2)(a) of the 2002 Act as amended.

⁴⁸ Section 12(3) of the 2002 Act as amended.

⁴⁹ Section 12(5) of the 2002 Act as amended.

⁵⁰ Section 12(6) of the 2002 Act as amended.

authorisation referred to in Regulation 6, , through open, objective, transparent, non-discriminatory and proportionate procedures.

Regulation 10(1)-(2) of the 2022 Regulations provide that ComReg shall specify non-discriminatory, proportionate and transparent conditions to be attached to such rights of use for numbers, though only as are listed in Part E of Schedule 1 of the 2022 Regulations. Pursuant to Regulation 10(3), an undertaking shall comply with the conditions attaching to rights of use for numbering resources applicable to it.

The numbering conditions set out in sections 4 and 5 of the Numbering Conditions of Use and Application Process Document fall into two broad categories in that they are either “General Authorisation Conditions” or “Rights of Use Conditions”.

Most of the numbering conditions are attached to the General Authorisation. These conditions are created and imposed pursuant to Regulation 6 and Part A of the Schedule 1 to the 2022 Regulations. This category of condition has universal effect in that applies equally to all authorised undertakings or to such categories of authorised undertaking as may be specified. An authorised undertaking which uses a number, to which one more conditions under the General Authorisation have been attached, is required to comply with those conditions.

Some of the numbering conditions are attached to “rights of use for numbers” which ComReg has granted to individual undertakings. These conditions are created and imposed pursuant to Regulation 10 and Part E of Schedule 1 to the 2022 Regulations. This category of condition does not have universal effect in that it applies only to the individual authorised undertaking which applied for and was granted the right of use to which the condition is attached. Only the individual authorised undertaking which applied for and was granted the right of use for a number is required to comply with the conditions attached to that right of use.

Regulation 26(1) of the 2022 Regulations requires ComReg to ensure that all relevant information on rights, conditions, procedures, charges, fees and decisions concerning the general authorisation, rights of use and rights to install facilities is published and kept up to date in an appropriate manner so as to provide easy access to that information for all interested parties.

Regulation 79(6) of the 2022 Regulations provides that: “The Regulator shall, subject to ensuring the proper management of the national numbering plan, grant rights of use for numbering resources and number ranges for all publicly available electronic communications services in a manner that gives equal treatment to all providers of publicly available electronic communications services

Regulation 79(7) of the 2022 Regulations provides: “The Regulator may, without prejudice to the generality of Regulation 10, attach conditions to rights of use for numbering resources — (a) (b) to ensure efficient and effective management of all numbering resources, and to ensure that a person to which the right of use for

numbering resources has been granted under this Regulation does not discriminate against a provider of publicly available electronic communications services as regards the numbering resources used to give access to its services.”

Regulation 14 of the 2022 Regulations provides that ComReg may amend the rights, conditions and procedures concerning rights of use for numbers, in an objectively justified and proportionate manner. Except where such an amendment is minor in nature and agreed to, ComReg shall give notice of its intention to make any amendments and shall invite interested parties to make representations.