

BEREC Framework Implementation Expert Working Group

Call for contributions to the questionnaire on Cross border Accessibility of Phone numbers

Foreword

As part of the BEREC work programme 2011¹ BEREC is preparing a report on the cross border accessibility of numbers. The demand for this report came up during the implementation of adaptations of article 28, paragraph 1² of the Universal Service Directive (USD). In brief article 28 USD, paragraph 1 provides that any consumer should be able to access any number in the EU. The article lists two exceptions on this basic rule:

1. When cross-border accessibility is technically or economically not feasible,
2. When a called subscriber has chosen for commercial reasons to limit access by calling parties located in specific geographical area's

With the report on cross-border accessibility of numbers, BEREC aims to provide more insight into the current situation of international accessibility and the actual application of the exceptions.

The report will be based on research carried out by the BEREC Framework Implementation Expert Working Group, and it will take into account replies to the questionnaire which you will find below. This questionnaire is addressed to all potentially interested stakeholders.

Moreover, we will welcome all additional information that could provide a better insight into issues outlined above.

Please be invited to respond to this BEREC questionnaire. Answers would be highly appreciated by **23 September 2011** and should be sent to:
berec@ec.europa.eu

¹ http://www.erg.eu.int/doc/berec/bor_10_43.pdf

² Article 28 of Universal Service Directive 2009/136/EC, Access to numbers and services

1. Member states shall ensure that, where technically and economically feasible, and except where a called subscriber has chosen for commercial reasons to limit access by calling parties located in specific geographical areas, relevant national authorities take all necessary steps to ensure that end-users are able to:

(a) access and use services using non-geographic numbers within the Community; and

(b) access all numbers provided in the Community, regardless of the technology and devices used by the operator, including those in the national numbering plans of Member States (MS), those from the ETNS and Universal International Freephone Numbers (UIFN).

Questions

Within this questionnaire the term cross-border communication means a call from any network in the EU Member State A to a number range according to the numbering plan of Member State B. This questionnaire refers to inaccessibility in cross-border communication if a number in Member State B cannot be reached from Member State A, where A and B are initially random Member States.

A. Which number range(s) are inaccessible in cross-border communication?

Some examples are: geographical numbers, mobile numbers, personal numbers, nomadic or VoIP numbers, harmonised numbers for harmonised services, numbers for emergency public utilities numbers, customer care services numbers, free phone call numbers, shared cost number, premium rate service numbers, directory enquiry service numbers.

1. In the national numbering plans of the EU Member States various types of numbers, allocated in different number ranges, typically exist. Please indicate in the table below whether a number range raises an accessibility issue during cross-border communication:

| Type of number range called | Accessibility Issue | Remarks |
|--|---------------------|---------|
| Geographic number | | |
| Mobile number | | |
| Personal number | | |
| Nomadic or VoIP number | | |
| Premium Rate Service (PRS) number | | |
| Free-phone number | | |
| Directory enquiry service number | | |
| Shared cost number | | |
| Internet dialling | | |
| Public utilities number | | |
| Emergency services number | | |
| SMS PRS number | | |
| Other special tariff number ³ | | |
| ETNS | | |
| UIFN | | |

Table 1 Accessibility in cross-border communication

2. Could you identify any differences in cross-border accessibility of number ranges based on the type of access network (network in Member State A: fixed, mobile, VoIP, etc.)?

³ For instance, national phone numbers for business and undertakings (the calling end subscriber pays the call but there is no payment for the called party).

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3. Please point out if an inaccessibility issue of the number range stems from an accessibility issue within a Member State (a national call).
4. Are you aware of any significant differences in the treatment of cross-border calls depending on the MS where the calling/called parties are located (that is, MS A and MS B)? In which MS and number ranges can you identify such differences?

B. Due to which reasons are these numbers inaccessible?

A quick scan of possible reason for cross-border inaccessibility of number ranges has resulted in the following list of reasons:

- Technical and operational limitations, (for example signalling and online/prepaid charging)
 - Pricing and billing issues (offline charging)
 - Numbering plan aspects
 - Aspects linked to access and transit wholesale interconnection services
 - Legal issues linked to the definition of services, (for example VAT, age for adult entertainment)
 - End user protection from fraud and misuse of numbering
 - Called subscriber has chosen not to be accessible from another Member State
 - Differences in language
 - No market demand
 - Other
5. Which additional reasons for cross-border inaccessibility of number ranges can you distinguish? Please add them to the list providing a short explanation for each one.
 6. For each of the non-accessible number ranges as indicated in response to question 1 above, could you describe and explain to the maximum extent possible, the concrete reason(s) (from those of the former list) for cross-border inaccessibility? Please indicate which are the most important ones from your point of view.

For retail price charge model, the following models can be distinguished:

- Calling party charged numbers (no value added service): typically geographical numbers, mobile numbers, personal numbers, nomadic or VoIP numbers.
- Free of charge for the caller: typically emergency services, public utilities numbers, free phone call numbers and harmonized numbers for harmonized services (116).
- Shared cost numbers

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- Premium rate service numbers
7. For which number ranges an inaccessibility issue could be related to the retail priced charge model (e.g., due to limitations asked by the user of free phone or shared cost numbers or for premium rate service and the related difficulty in complying with the regulation of the Member States).
 8. Which are in your opinion the most important issues regarding national regulations that prevent or hinder a fully cross-border accessibility of number ranges?

For inter-operator price charging two models can be distinguished:

- termination model (originating operator fixes the retail price and pays the termination rate to the terminating operator)
 - origination model (terminating operator fixes the retail price and pays the originating rate to the originating operator)
9. For which number ranges the inaccessibility could be related to the inter-operator price charging model?
 10. BEREC is interested in best practices of cross-border special tariff services. Please provide examples of cross-border special tariff services that you might be aware of, which are working currently on the basis of cooperation among operators (e.g. certain services functioning among two neighbouring countries, such as directory inquiry). Please elaborate on the agreements, technical solutions adopted, conditions applied to the calling subscriber and any other subject considered relevant.

C. To what extent is inaccessibility perceived as a problem?

11. Does your organization receive complaints from stakeholders (like individual users, groups or organizations) that some number ranges are not cross-border accessible? If yes, please describe the complaints and from whom they are coming.
12. From your point of view, which are the most important barriers and problems derived from cross-border inaccessibility?

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The following examples of stakeholders that have an interest in cross-border communication are:

- Consumers (in home country or abroad like travellers)
- Companies (customer service departments, helpdesks, sales, business travellers, expats etc.),
- Network Services providers (access, transit and terminating, inbound services),
- Content service providers,
- Public bodies and governmental organizations

13. Please describe which stakeholders in your opinion are most affected by the cross-border inaccessibility of number ranges. How are these stakeholders impacted by the inaccessibility? Do these stakeholders have any influence on the accessibility of the number?

14. What new opportunities, products, services and business activities in your opinion could be developed in an open-access framework for special tariff numbers? (e.g. new platforms and contents, new access network provider wholesale services, etc.)

15. Do you perceive the inaccessibility of number ranges as a treat for the European Union's Internal Market which seeks to guarantee the free movement of goods, capital, services, and people within the EU's 27 member states?

16. Regarding to which specific number ranges would you advise to the European Commission and/or BEREC to take the required actions to improve the cross-border accessibility? Please give an explanation of these actions.

D. Room for additional comments and considerations

Please provide us with your feedback on any additional input or comment that could bring more insight in the current situation of international accessibility and the actual application of the exceptions. Please use the space below for additions.