

## Public Consultation on "Network-Internal" Service Numbers

Austrian Regulatory Authority for Telecommunications and Broadcasting (RTR GmbH)  
Mariahilfer Strasse 77-79  
A-1060 Vienna, Austria

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Mobile network operators refer to the 3 to 5-digit numbers dialed by their subscribers without a country code or the network-specific area code (0-6xx in Austria) as "network-internal short codes". However, according to the Austrian Numbering Ordinance (NVO), each number dialed from a mobile handset is to begin with the national prefix ("0") and contain the entire NSN (national significant number, e.g., for geographical numbers: area code and subscriber number). One exception to this rule is the number range 1, which contains public-interest numbers such as emergency services.

If the numbers described above are indeed "network-internal" numbers which exist independently of the public E.164 numbering plan, then they would also have to be completely unaffected by changes to the public numbering plan. It is fairly easy to demonstrate that this is not the case with the short codes currently in use, for example by assuming that the current numbering plan were closed (i.e., no local dialing permitted, each number always dialed as the full NSN beginning with the area code) and the accompanying removal of the national prefix "0". An number in the area "0xyz" would then migrate to the "xyz" number range - precisely where the "network-internal" short code "xyz" is currently in use. These short codes are thus clearly within an - currently - unused range of the public numbering plan.

In the interest of maintaining flexibility in numbering plan administration, RTR GmbH is therefore interested in preventing any additional use of such numbers. The procedure to be followed with regard to existing short codes is under discussion.

In some cases, these short codes involve mobile network services which could easily be offered in the 0800-0930 number range. One argument put forward by mobile network operators is that service differentiation must be possible for (mobile) operators.

In order to find a legal arrangement which is acceptable to all parties involved, RTR would like to suggest the definition of an official "public numbering plan exit code" in the Numbering Ordinance. This code would be used by all networks for network-internal numbers and end the current "discrimination" of fixed-networks and carrier selection network operators.

From RTR's point of view, a "1xy" (or alternatively " \*xy") exit code could be used. Subscribers linked directly to a network would then dial "1xy-a(bcdefghi)". Access to network-internal numbers in carrier selection networks would be gained by dialing

"10xx-1xy-a(bcdefghi)". In the examples indicated, the number length is limited to 12, but as a rule far shorter numbers would probably be used (typically 4 to 5 digits).

In RTR's view, it is also essential to find a fee arrangement which is transparent to the subscribers. In any case, the principles set forth in the Fee Ordinance (EVO) are not to be violated.

Another point to be discussed is whether use of the "1xy" sub-ranges should be harmonized throughout all networks.

In connection with the introduction of number portability in mobile networks, harmonizing the most important standard services offered in all (mobile) networks (e.g., account balance inquiries, voice mail access, etc.) could be helpful in dismantling potential barriers to switching providers.

It is also necessary to decide which services should be assigned network-internal numbers:

#### Use Option 1: Restriction of services

The use of network-internal numbers would be restricted to those services which (for technical reasons) can only be realized and offered in the operator's own network and/or are (for obvious reasons) only aimed at subscribers to the operator's own network (e.g., account balance inquiries for prepaid mobiles or services which are implemented in mobile networks and based on location information which is only available there).

#### Use Option 2: No restriction of services

This option would deliver considerable advantages regarding flexibility in the network-internal number range, for example in end-consumer fee scheduling (time-dependent rates, event-based rates, etc.), as the service-providing network would charge the final consumer directly. In contrast to the general case of public service numbers, which have to be reachable from all networks, this would eliminate all restrictions arising from network-to-network service fee charging arrangements.

One essential problem in Option 2 is as follows: Equal number lengths for services provided are among the essential criteria for fair competition. By acting as content service providers, network operators would be placed at a discriminatory advantage over content service providers who do not own a network because these kind of content service providers would have access to (short) network-internal numbers.

In conclusion, we would like to comment on potential discrimination by SMP operators in connection with network-internal numbers: SMP operators could be required to offer access to their network-internal services to the customers of alternative network operators by offering some form of network operator selection (restricted to this number range).

### **Consultation Questions:**

Should a range for "network-internal" numbers be created in the public numbering plan?

Is the code "1xy" a sensible approach to exiting the public numbering plan / entering each operator's specific internal numbering plan?

Would an exit code beginning with the character "\*" or "#" be technically feasible in your network? If no, please explain.

Should network-internal numbers be made available to all network operators (fixed, mobile and carrier selection networks)?

Should there be (partial) harmonization across networks for standard network-internal service numbers?

Should there be restrictions on the services offered in this number range? In your view, what kind of restriction would be most reasonable? How should the argument regarding service differentiation be assessed?

Could network-internal services bring about significant number portability-related barriers to switching operators?

How should final consumer fees be regulated in this field?