# Summary of Comments on the ENUM Consultation in Austria

From July 31 to September 15, 2001, the Austrian Regulatory Authority for Telecommunications and Broadcasting (RTR) carried out a consultation procedure on the topic of ENUM (Telephone Number to Universal Resource Identifier Mapping).

In essence, ENUM is the mapping of telephone numbers to Internet domain names as well as the related additional functions arising in the course of convergence among conventional telephone networks and IP-based networks (Internet).

Low Participation
At the end of the submission period, comments and opinions had been received from only seven organizations; one of these submissions was confidential. It is worth mentioning that neither the ISPA (Internet service provider interest group) or any of the ISPs themselves submitted their comments.

Significance in the Convergence of Internet and Telephone Services
A majority of the comments favored the conclusion that ENUM is a well-suited way of making a contribution to more rapid convergence. Before that is possible, however, a number of unanswered questions (see below) will have to be addressed.

The Roles of the Ministry of Transport, Innovation and Technology (BMVIT) and the Regulatory Authority (RTR)
The majority of contributors saw the creation of a legal and technical framework for ENUM implementation as the task of the Ministry (BMVIT / Highest Telecommunications Authority). RTR is envisaged as a regulatory "accompaniment" to the ministry during the implementation phase and as a moderator between the Ministry and network operators as well as among the operators themselves.  Several contributors also saw the administration of Austria's Tier 1 registry (with the possibility of outsourcing operations) as another potential responsibility for RTR.

Global ENUM Tree
The comments submitted favored the implementation of a clearly defined ENUM tree unanimously. Administration of the root zone should be handled internationally and in a politically and commercially neutral manner, preferably within the framework of a UN organization (ITU was mentioned several times).

Up-to-date and Authentic Data
In several submissions, the issue of data authenticity and updating was addressed; these contributions pointed out that a service provider can only assure data integrity for its own services and that an independent registrar can generally only check a customer's authorization data when having changes introduced for a certain telephone number. When dealing with external services, operators and registrars can not ensure that the customer gives correct information, nor that this information is up to date.

Impact of Number Portability
In connection with number portability and the accompanying necessity of updates in ENUM databases, many pointed out the high level of complexity in this issue, concluding that separate analysis would be required.

Bottlenecks
Potential bottlenecks in ENUM implementation were seen in primarily political, administrative and business-related aspects of the process. The following requirements were identified as crucial to ENUM's success: International coordination with the EU, telecom (ITU, ETSI) and Internet bodies (IETF, ICANN) as well as national laws and regulations, a critical analysis of costs and benefits as well as the clear definition of processes between the registry, registrars and operators.

The individual submissions as well as a comprehensive summary of the consultation's results (in German) is available on RTR's web site (http://www.rtr.at).