

SOKOLOV

Guten Tag!

Folgend meine Stellungnahme zur Konsultation zum Thema "Guidelines for VoIP Service Providers". Bitte veröffentlichen Sie meine E-Mail-Adresse nicht im Internet, ich möchte weiteres Anwachsen der Spam-Flut vermeiden.

Danke

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Legal basis regarding number usage conditions

The legal basis regarding number usage conditions is flawed, the relevant regulation (KEM-V) should be changed. The introduction of special number ranges for nomadic services (0720, 0780) was a bad idea. As it turns out, many of these numbers are not reachable from many networks, even from within Austria. Especially for calls from outside Austria, egregious fees are charged by international wholesalers, which end up on the bill of the caller, of course (if the connection is established at all). As there is no regulation prohibiting higher rates, it is foreseeable that even some Austrian operators will introduce higher prices for connections to 0720 and 0780, as we have seen it happening for the 05 number range (where for example mobilkom austria charges the rate for calls to other mobile networks, which is in most cases considerably higher than the rate for calls to fixed networks). As far as I know, not even all Austrian emergency response centers are able to call all 0720 and 0780 numbers.

However, this is not a typical Austrian problem, but a problem connected with special number ranges in general. Even calls to free phone-numbers are often very expensive, if called from a different country. If the authorities want to boost ENUM usage and take a technology neutral approach to VoIP, the condition of a fixed network termination point for geographic numbers has to be scrapped. The usual argument concerning location information for emergency services is not a valid one, as the service provider could be forced to send a certain indicator or a 0720-number-identification with emergency calls. Even before VoIP it could not be guaranteed that a call is really originating at the network termination point indicated by the number displayed -- devices with SIM-cards and connected to a fixed network are available for years for <100 Euro.

A cheap solution for the emergency calls argument would be a special indicator in the relevant databases next to the address of the "fixed network termination point", that the number is being used nomadically. So a simple registration of normal "geographic" numbers as "nomadic" would be sufficient.

The flaw of the idea of certain number ranges for nomadic services becomes even more obvious, when one tries to think it through with UMA (unlicensed mobile access) and other convergent services.

Access to Emergency Services

Providers of Class A VoIP services should not be obliged to offer emergency call routing or even emergency call routing to a certain response center. However, the providers should be obliged to clearly

state how they deal with emergency calls (are they being routed, where are they being routed) in the contracts with their customers (via AGB - Allgemeine Geschäftsbedingungen).