

TELECOMMUNICATIONS NUMBERING ADVISORY COMMITTEE

Allocation of “17X” Short Codes to Mobile Network Operators and Mobile Virtual Network Operators (II)

Introduction

In order to cope with the demand of “17X” short codes for provision of customer enquiry services, hotlines and operator-assisted services (the Service) by the mobile network operators (MNOs) and mobile virtual network operators (MVNOs), the Telecommunications Authority (the TA) proposed in the NAC Paper No. 4/2002 to assign one 5-digit “17” short code to each MNO and MVNO for provision of the Service. Following the discussion at the 46th Meeting, members of the Telecommunications Numbering Advisory Committee (TNAC) were requested to submit their comments for consideration. This paper summarizes the comments received and the TA’s recommendation of assigning 5-digit “17XXX” short code to the MNO and MVNO for the Service.

Comments Received

2. A total of seven submissions were received with regard to the NAC Paper 4/2002. Consumer Council supported the proposal and considered that an operator assigned with a 3-digit code would not have any competitive advantage over another operator assigned with a 5-digit code for provision of the Service. China-Hongkong Telecom Limited, China Motion Telecom (HK) Limited, Shell & SUNDAY Mobile Communications Limited and Trident Telecom Ventures Limited welcomed and supported the proposal. China Unicom International Limited submitted no specific comment on the paper.

3. TNAC member representing the Public Radiocommunication Services Licensees as a Group commented that:

- (a) 3G MNO should be treated fairly as his 2G counterpart and should be assigned 3-digit short code;

- (b) other spare codes in the number level “1” e.g. “11X”, “12X”, or “13X” should be considered for assignment to mobile services; and
- (c) 5-digit short code should only be assigned to “full MVNOs”. (Note: It is understood throughout the discussion at the TNAC meeting that “full” MVNOs refer to those MVNO who comply with the criteria laid down in Appendix 6 of the Code of Practice Relating to the Use of Numbers and Codes in the Hong Kong Numbering Plan.)

TA’s Considerations

4. Regarding the allocation of numbering resources, the TA considers that MNOs and MVNOs should be treated fairly because the services provided by the MVNOs and network operators are similar. In addition, the MVNOs would be regulated on a par with the MNOs to ensure a fair competition environment would be maintained. In this connection, the TA considers that MNOs and those eligible MVNOs should be assigned with short codes of the same digit length.

5. As regards to the comments on the assignment of unallocated “11X”, “12X” and “13X” codes to mobile services, the TA considers it inappropriate because of the following reasons:

- (a) “11X” codes are reserved for harmonization with other places in the region and the assignment of unallocated “11X” codes has adverse impact to the numbering plan in the longer term.
- (b) “12X” are short codes for enquiry services provided by the FTNS operators and would be deployed to cope with the full liberalization of the FTNS market in 2003.
- (c) “133” and “1357” are currently allocated for blocking and unblocking the calling number display service. To preserve the integrity of the numbering plan, it is preferred that the “13X” codes should be reserved for use as access codes to service features.

6. Having noted the views expressed by the members and the considerations given above, the TA has considered the following three options for allocating “17” prefixed short codes to the MNOs, and those MVNOs who comply with the criteria stated in Appendix 6 of the Code of Practice Relating to the Use of Numbers and Codes in the Hong Kong Numbering Plan:

- (a) 4-digit “17XX” short codes in the number levels “172” and “174” would be assigned. Under this arrangement, a total of twenty “172X” and “174X” short codes would be available for assignment. However, it is envisaged that twenty “17XX” short codes would not be able to meet the demand of the mobile industry in the near future.
- (b) 4-digit “172X” (or “174X”) short codes and 5-digit “174XX” (or “172XX”) short codes would be assigned. A total of ten 4-digit “172X or 174X” short codes and one hundred 5-digit “174XX or 172XX” short codes would be available. This option would increase the supply of short codes, but is not equitable to the operators applying for “17” prefixed short codes at a latter date, as they might not be able to obtain 4-digit short codes.
- (c) 5-digit “172XX” and “174XX” short codes would be assigned. A total of two hundred “172XX” and “174XX” short codes would be available.

7. Preliminary, the TA considers that option (c) is more appropriate as it would provide sufficient “17XXX” short codes to meet the potential demand from the industry. Furthermore, a MNO and MVNO may submit a request to the TA for assignment of their preferred “17XXX” short codes through charity donation. The application for assignment of preferred short code via charity donation would be considered by the TA on a case-by-case basis.

Advice Sought

8. Members are invited to give their views and comments on this paper.

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