

TELECOMMUNICATIONS NUMBERING ADVISORY COMMITTEE

The Use of "12X" and "17X" Codes

Purpose

To seek members' views and comments on whether an operator who simultaneously owns and operates a fixed network and a mobile network could implement and use the allocated "12X" and "17X" codes for both of its fixed and mobile operations.

Introduction

2. In the Appendix 3 of the "Code of Practice Relating to the Use of Numbers and Codes in the Hong Kong Numbering Plan (Cap. 269)" dated 11 October 1997 (hereafter called the Code of Practice), the Telecommunications Authority (TA) has indicated how short codes are classified and allocated to the telecommunications industry. In para. 4 of this Appendix 3, the TA has also given the guidance principles on how Fixed Telecommunication Network Services (FTNS) operators and mobile operators on using the "12X" and "17X" codes respectively in their networks in the following text -

"In order to utilize the short codes more efficiently and effectively, the TA will assign to every FTNS operator a "12X" code and every mobile operator a "17X" code for their various customer enquiry, hotlines requirements and operator-assisted services. Depending on their own operational requirements, the FTNS and mobile operators can be flexible with the application and the digit length of the allocated short codes provided that they do not exceed 7 digits in length. In addition, the use of these short codes should not duplicate those services which have already been catered for under a separate numbering range in the Numbering Plan. Except for the "18" level, all short codes and their sub-levels should not be assigned to customers under any circumstances."

The Use of "12X" and "17X" Codes

3. The TA has finally allocated to each FTNS operator a "12X" code for its fixed operations and each mobile operator a "17X" code for its mobile operations. As

a result, an operator who simultaneously owns and operates fixed and mobile network has been allocated two codes, a "12X" code and a "17X" code. The Office of the Telecommunications Authority (OFTA) has recently received a complaint from industry about one of these operators who had used its allocated "12X" code for both of its fixed and mobile operations. With regard to this complaint, the TA has the following views and considerations-

- The major reason to allocate a 3-digit short code to each fixed or mobile operator is that it can assist the operator to market and promulgate its customer enquiry services more prominently and easily. By means of short code dialing, customers' enquiry calls will be routed and handled more quickly and efficiently by operators' customer enquiry or hotline centres.
- For cost-effectiveness and efficiency reasons, operator may only provide and run a centralized customer enquiry centre for both of its fixed and mobile operations. Since customers may have, at the same time, subscribed to both fixed and mobile services of this operator, it would be convenient and beneficial for customers to remember only a single access short code in accessing this operator's centralized customer enquiry services.
- The TA considers that allowing operators to implement and market the allocated "12X" and "17X" codes for their customer enquiry services, hotlines and operator-assisted services for both of their fixed and mobile operations should not have any adverse effect or impact on competition in the telecommunications industry. In fact, the "12X" and "17X" codes can be flexibly implemented by operators in the following ways -
 - a) to use "12X" code solely for the fixed operations and "17X" code solely for the mobile operations; or
 - b) to use "12X" as the centralized customer enquiry function for both fixed and mobile operations while "17X" is used for any other customer hotlines purposes; or
 - c) to have mix-use of "12X" and "17X" codes for all fixed and mobile operations.
- A mobile operator which does not operate any fixed network is not disadvantaged as it has been allocated a "17X" code.
- The TA requires that the concerned operators should remain to comply with the restrictions and requirements as given in para. 4 of the Appendix 3 of the Code of Practice.

Proposed Amendment to the Code of Practice

4. As a result of the above considerations, the TA is of the view that operators having allocated both "12X" and "17X" codes could implement and use these codes for all of their fixed and mobile operations. In addition, the TA proposes to revise para. 4 of the Appendix 3 of the Code of Practice by inserting an appropriate sentence (in bold) at the back as follows -

*"In order to utilize the short codes more efficiently and effectively, the TA will assign to every FTNS operator a "12X" code and every mobile operator a "17X" code for their various customer enquiry, hotlines requirements and operator-assisted services. Depending on their own operational requirements, the FTNS and mobile operators can be flexible with the application and the digit length of the allocated short codes provided that they do not exceed 7 digits in length. In addition, the use of these short codes should not duplicate those services which have already been catered for under a separate numbering range in the Numbering Plan. Except for the "18" level, all short codes and their sub-levels should not be assigned to customers under any circumstances. **However, operators who simultaneously own and operate fixed and mobile networks are allowed to implement and use the allocated "12X" and "17X" codes in their fixed and mobile operations provided that they remain to comply with the above restrictions and requirements.**"*

Advice Sought

5. Members are welcome to give their views and comments on TA's considerations and proposed amendment of the Code of Practice in para. 3 and 4 above.

Office of the Telecommunications Authority
3 November 1997