

**COMMUNICATIONS
ALLIANCE LTD**



INDUSTRY GUIDELINE

G636:2007

GUIDELINE FOR CARRIAGE SERVICE PROVIDERS
ENSURING THE ACCURACY OF GEOGRAPHIC
NUMBERING RECORDS

**G636:2007 Guideline for Carriage Service Providers
ensuring the accuracy of geographic numbering records**

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EXPLANATORY STATEMENT

This is the Explanatory Statement for the G636:2007 **Guideline for Carriage Service Providers ensuring the accuracy of geographic numbering records** Industry Guideline.

This Explanatory Statement outlines the purpose of this Industry Guideline (the Guideline) and the factors that have been taken into account in its development.

Background

CSPs that provide an eligible customer with eligible local calls¹ associated with a standard telephone service are required to offer the customer the option of untimed local calls. This obligation is set out in Part 4 of the *Telecommunications (Consumer Protection and Service Standards) Act 1999* (the TCPSS Act). In order to comply with this obligation and apply the correct charges, CSPs must determine the geographic location of the calling and called customers.

The location of a customer may be determined by analysing the prefix of geographic numbers issued to the customer. The standard zone unit (SZU) or location for a customer's prefix is set out in the Australian Communications and Media Authority (ACMA) register of allocated numbers, known as NUMB.

For untimed local call charging to be *accurately* determined by a CSP, *all* CSPs must issue geographic numbers to customers located in the SZUs for which the numbers were allocated. If a CSP mis-issues a number, charging may not be based on the correct physical location of the customer. As a result, some calls from (and to) the mis-issued number may be overcharged and some calls may be undercharged.

CSPs should be mindful, when dealing with charging complaints from customers, of the potential charging inaccuracies which may arise as a result of mis-issuing numbers. CSPs should ensure that customers are not disadvantaged as a result of mis-issued numbers.

Anomalies may be discovered via customer complaints or via customer requests to port numbers and checking by the receiving carrier. Resolution of the problem may require changing the allocation in NUMB or changing the customer's telephone number.

The geographic location of numbers mis-issued by CSPs may be changed through an application to ACMA to change the SZU in NUMB to which a block of numbers is allocated (i.e an allocation variation).

¹ "...VOIP service providers are not required to offer customers the option of untimed local calls, unless the VOIP service is offered in fulfilment of the USO. It appears that calls from VOIP services are not covered by the untimed local call obligation in Part 4 of the *Telecommunications (Consumer Protection and Service Standards) Act*, as they are not calls of a kind provided on an untimed basis immediately before 20 September 1996."

Examination Of Policy And Regulation Relating To Voice Over Internet Protocol (VoIP) Services, Report To The Minister For Communications, Information Technology And The Arts, Prepared By The Department Of Communications, Information Technology And The Arts, November 2005, Page 37.

Even though VOIP providers may not have to meet the untimed local call obligation, there is still a need for these providers to follow the rules and obligations in the *Telecommunications Numbering Plan 1997* in the allocation, issue and use of geographic numbers.

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1 GENERAL

1.1 Introduction

- 1.1.1 The development of the Guideline has been facilitated by ACMA through a Working Group comprised of representatives from the telecommunications industry, Government regulatory agencies, and consumer groups.
- 1.1.2 The Guideline should be read in conjunction with related legislation, including:
 - (a) the Act; and
 - (b) the Plan.
- 1.1.3 If there is a conflict between the requirements of the Guideline and any requirements imposed on a Supplier by statute, the Supplier will not be in breach of the Guideline by complying with the requirements of the statute.

1.2 Objectives

The objective of this Guideline, in conjunction with numbering regulations, is to provide Carriage Service Providers with guidance on how to:

- (a) obtain geographic number allocation data for charging and routing purposes; and
- (b) apply to change the data in the Register of Allocated Numbers (called 'NUMB') for numbers incorrectly issued to customers, to ensure the accuracy of geographic numbering records.

1.3 Guideline review

Review of the Guideline will be conducted after 2 years of the Guideline being published and every five years subsequently.

2 ACRONYMS, DEFINITIONS AND INTERPRETATIONS

2.1 Acronyms

For the purposes of the Guideline, the following acronyms apply:

ACIF	Australian Communications Industry Forum
ACMA	Australian Communications and Media Authority
CSP	Carriage Service Provider
SZU	Standard Zone Unit

2.2 Definitions

For the purposes of the Guideline, the following definitions apply:

Act

means the *Telecommunications Act 1997*.

Carriage Service Provider

has the meaning given by section 87 of the Act.

Carrier

has the meaning given by section 7 of the Act.

NUMB

means the NUMBering database containing lists of numbers allocated by ACMA under the Plan.

Plan

means the *Telecommunications Numbering Plan 1997*.

Standard Zone Unit

has the same meaning as defined in the Plan.

2.3 Interpretations

In the Guideline, unless the contrary appears:

- (a) a reference to a statute, ordinance, code or other law includes regulations and other instruments under it and consolidations, amendments, re-enactments or replacements of any of them;
- (b) words in the singular includes the plural and vice versa;
- (c) words importing persons include a body whether corporate, politic or otherwise; and

- (d) a reference to a person includes a reference to the person's executors, administrators, successors, officer, employee, volunteer, agent and/or subcontractor (including but not limited to, persons taking by novation) and assigns.

3 ACMA'S REGISTER OF ALLOCATED RECORDS (NUMB)

- 3.1 ACMA is required to maintain a register of allocated numbers (including geographic numbers) under section 465 of the Act. This register is known as NUMB.
- 3.2 NUMB (available on-line at <http://web.acma.gov.au/numb/login.do>), is a web-based application that provides a consolidated and current list of all number allocations in Australia which can be used by CSPs to maintain accurate charging and routing tables. NUMB enables CSPs to:
- (a) download the entire database of allocations, in Microsoft Access format;
 - (b) search for information about allocations;
 - (c) submit applications² for numbers on-line;
 - (d) submit applications to transfer numbers on-line;
 - (e) view annual number charge debts; and
 - (f) access a user manual instructing CSPs on how to perform numbering transaction.
- 3.3 An important purpose of NUMB is to provide allocation data for CSPs to enable them to specify charging and routing tables for their telephone exchanges and billing systems. These tables provide routing information for interconnection purposes, pre-selection and charging information for both timed and untimed local calls. This information must be accurate so CSPs can comply with their obligations to provide untimed local calls.
- 3.4 In Australia, CSPs – especially new entrants – do not have interconnect agreements with every other CSP in the market. Consequently, CSPs can not rely solely on advice about allocation data from other CSPs with which they have interconnect agreements to maintain the accuracy of their charging and routing tables. CSPs must reconcile their information in their charging and routing tables with NUMB data to maintain the accuracy of their information.

² To undertake numbering transactions on-line (eg apply for and transfer numbers) and view their ACMA numbering debts, CSPs must be registered clients with ACMA. The client is provided with login details (User Name and Password) and requires an Australian Business Number Digital Signature Certificate (ABN-DSC) for secure transaction, see http://www.acma.gov.au/webwr/_assets/main/lib100024/registration%20process%20and%20digital%20certificates.rtf

4 RULES FOR ISSUING GEOGRAPHIC NUMBERS

- 4.1 If a CSP provides a local telephone service to a customer, part of the provisioning of this service includes the 'issue' of a geographic number to the customer for 'use' in connection with that local service.
- 4.2 The general rule for customer charging, in order for CSPs to meet their untimed local call obligation under Part 4 of the TCPSS Act, is that calls between numbers within the same SZU or to an adjacent SZU are charged at a local call rate³.
- 4.3 Chapter 3 of the Plan sets out the rules for:
- (a) the issue and use of geographic numbers; and
 - (b) SZUs.

In summary, CSPs should ensure that, when they issue geographic numbers to their customers, the service is physically located in the SZU for which the number was allocated. CSPs must charge calls to a number at the rate that would apply if the service was located in the SZU to which it is allocated. As mentioned in the Explanatory Statement, the implications of incorrectly issued numbers may result in potential charging inaccuracies.

- 4.4 If a CSP issues a number incorrectly (i.e. in the wrong geographic location) it may cause charging to be based on where the numbers were allocated rather than where the customer is physically located. Calls from, and calls to, the mis-issued number which should have been untimed local calls may be overcharged and some calls that should have been charged as long distance calls may be undercharged as untimed local calls compared with calls from (and to) numbers correctly allocated to that standard zone unit.

³ Note there are exceptions to this general rule. For example, when the SZU is a charging precinct located within an extended zone, or the SZU is an extended zone. For a detailed listing of which zones are adjacent see http://www.acma.gov.au/WEB/STANDARD/pc=PC_300262.

5 INDUSTRY PRACTICE TO COMPLY WITH RULES FOR ISSUING GEOGRAPHIC NUMBERS

- 5.1 CSPs must ensure that their staff correctly issue geographic numbers to their customers by implementing appropriate practices and procedures.
- 5.2 CSPs can employ a range of practices to avoid and resolve the mis-issuing of numbers to their customers. These practices may include:
 - (a) documenting the procedures for their staff to issue numbers correctly to customers;
 - (b) CSP staff verifying that a number is issued in the correct zone – these checks would be built into the CSP's issuing procedures and the front-of-house customer service systems used for this purpose;
 - (c) CSPs documenting customer complaints handling procedures which include the action required to correct mis-issued numbers and when to advise ACMA if mis-issued numbers are identified;
 - (d) training CSP staff to use all the procedures; and
 - (e) CSPs undertaking internal (independent) checks to ensure numbers have been issued correctly and procedures are followed.

6 ACMA PROCESS OF CORRECTING MIS-ISSUED NUMBERS

- 6.1 Two options are available to CSPs in situations where a mis-use of numbers has been identified:
- (a) either change the customer's telephone number; or
 - (b) apply to ACMA to vary an allocation of numbers to correct the mis-issue.
- 6.2 Part 3 of Chapter 6 of the Plan provides for correcting mis-issued numbers. Under certain circumstances, an allocation of numbers may be varied by ACMA (i.e. the SZU allocated to a particular number prefix is changed).
- 6.3 To make an application to ACMA to vary an allocation, the CSP must write to the Manager Telecommunications Licensing and Numbering Section at ACMA detailing:
- (a) the number range to be changed (which must be an appropriate multiple for issue under the Plan);
 - (b) the old and new SZU/geographic sector;
 - (c) details of the original allocation to the applicant CSP;
 - (d) an explanation of how and why the number was inappropriately mis-issued;
 - (e) the customer consultation processes undertaken, including the level of customer support and process for resolution; and
 - (f) any consultation with other CSPs.
- 6.4 ACMA may approve the application after taking into account:
- (a) the completeness of the application;
 - (b) whether the mis-issued number is part of a block that is of a minimum unit size;
 - (c) if the number does not terminate in the SZU or sector for which the unit was previously allocated;
 - (d) any implications for consumer understanding and customer equipment; and
 - (e) any consultation with other relevant CSPs to ascertain the effects of the proposed change.
- 6.5 CSPs should be aware that under Section 6.33 of the Plan, ACMA must refuse the application if the variation:
- (a) causes inconsistencies with number analysis capabilities of telecommunications networks in Australia;

- (b) results in the numbers being allocated to a SZU within a different charging district;
 - (c) reduces the geographic significance of the numbers; or
 - (d) the disadvantage for other CSPs, customers or end-users outweigh the advantages of varying the allocation (including the implications for the public's comprehension of the charging system and for customer equipment, if any).
- 6.6 Under section 6.34 of the Plan, ACMA must process an application to vary an allocation within 15 working days from receipt of the application if:
- (a) no further information is required from the applicant; and
 - (b) there is no consultation required by ACMA of other CSPs or equipment/service suppliers in relation to the application.
- 6.7 ACMA may extend this time period for 30 business days for the purpose of further consultation if required.
- 6.8 When an application is approved, ACMA will advise CSPs holding geographic numbers, and the Telecommunications Industry Ombudsman, about the change by email as soon as practicable.

7 CSP PROCESSES ONCE ACMA HAS CORRECTED MIS-ISSUED NUMBERS

- 7.1 Once ACMA notifies CSPs that it has approved an application to vary an allocation to correct the mis-issue of numbers by a CSP, all CSPs are required to implement the changes required in a reasonable time frame. These changes may take up to three months, however, CSPs should aim to complete the process as quickly as possible. During this period, there may be some mis-alignment between NUMB and CSP systems.
- 7.2 All CSPs with local and national long distance based charging for calls should:
- (a) identify the impact on their customers including: call charging implications for the future billing cycles;
 - (b) update customer information (paper and web based);
 - (c) advise customers of any significant effects; and
 - (d) undertake activities, where relevant, in accordance with industry codes:
 - (i) ACIF C518:2006 Call Charging and Billing Accuracy⁴ – addresses the minimum required level of call charging and billing accuracy of the standard telephone service;
 - (ii) C628:2007 Telecommunications Consumer Protections Code section 6 Billing – addresses billing issues ensuring clarity, accurateness, timely and completeness of bills and billing related information;
 - (iii) C628:2007 Telecommunications Consumer Protections Code section 9 Complaint Handling – addresses minimum standards on complaint handling procedures including complaint recording and customer information; and
 - (iv) ACIF C566:2005 Rights of Use of Numbers - specifies what is meant by a customer's rights of use of his/her number(s) and the obligations of service providers in relation to the customer's number(s).
- 7.3 The following CSP systems may need to be updated as required:
- (a) front-of-house customer management system;
 - (b) billing system; and
 - (c) routing and charging tables in telephone exchanges.

⁴ Note, ACIF Code C518:2006 covers procedures and processes to avoid instances of over- or under-charging of calls. It does not offer guidance to CSPs should charging inaccuracies arise.

8 REFERENCES

Publication	Title
Industry Codes	
ACIF C518:2006	Call Charging and Billing Accuracy
ACIF C566:2005	Rights of Use of Numbers
C628:2007	Telecommunications Consumer Protections
Industry Guidelines	
G631:2007	Telecommunications Consumer Protections (TCP) Guideline
Legislation	
<i>Telecommunications Act 1997</i>	
<i>Telecommunications (Consumer Protection and Service Standards) Act 1999</i>	
<i>Telecommunications Numbering Plan 1997</i>	

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Communications Alliance was formed in 2006 to provide a unified voice for the Australian communications industry and to lead it into the next generation of converging networks, technologies and services.

In pursuing its goals, Communications Alliance offers a forum for the industry to make coherent and constructive contributions to policy development and debate.

Communications Alliance seeks to facilitate open, effective and ethical competition between service providers while ensuring efficient, safe operation of networks, the provision of innovative services and the enhancement of consumer outcomes.

It is committed to the achievement of the policy objective of the *Telecommunications Act 1997* - the greatest practicable use of industry self-regulation without imposing undue financial and administrative burdens on industry.



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