

According to the Working Methods of the ECC on behalf of NASK I would like to present the following comment to the *DRAFT ECC RECOMMENDATION (05)03 - NUMBERING FOR NOMADIC "VOICE OVER IP" SERVICES*

NASK strongly recommends not to use the geographic numbers for nomadic services.

Operators or service providers allocating the geographic numbers to the end-users must provide customers with the special services like calling the **proper (according to the geographic location) office of emergency services (police, ambulance service, fire brigade etc)**. Additionally local regulations may also order operators to provide the emergency service institutions with the information **on the location of the calling party** in case of calling the emergency service.

Allocating the geographic numbers to the nomadic/VoIP users results in the serious problem for operators in offering an access to the emergency services. Geographical numbers by the definition bind the number with the location and this is inconsistent with the idea of nomadic VoIP services. On the base on mentioned above arguments **we would like to recommend an amendment to the following text:**

f) that the first option (the geographic number range) supports competition better, but the impact on number exhaustion needs consideration;

recommends

1.that national regulatory authorities decide in the short term on whether and how to adapt their national E.164 numbering plan to support these new services in their countries in order to promote competition and not to block innovative services from entering the market;

2.that national regulatory authorities should consider as the two main options for accommodating such services:

- allocating numbers in the geographic range, in many countries requiring a modification of the allocation criteria for the geographic range,*
- modifying the numbering plan by adding a new number range for services with nomadic features;*

3. that national regulatory authorities should consider implementing both options;

4. that national regulatory authorities consider all advantages and disadvantages of the various options as listed in ECC Report no 59 "Numbering for VoIP Services", 16 December 2004

with the wording:

~~*f) that the first option (the geographic number range) supports competition better, but the impact on number exhaustion needs consideration;*~~ [deleted]

recommends

1.that national regulatory authorities decide in the short term on whether and how to adapt their national E.164 numbering plan to support these new services in their countries in order to promote competition and not to block innovative services from entering the market;

2.that national regulatory authorities should consider, as the main option for accommodating such services, modification of the numbering plan by adding a new number range for services with nomadic features;

3.that national regulatory authorities consider all advantages and disadvantages of the various options as listed in ECC Report no 59 "Numbering for VoIP Services", 16 December 2004

**Kind regards,
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