

Vice-President Neelie Kroes

European Commission

by e-mail

5 July 2011

Dear Mrs Kroes,

We are writing to you about a topic - the ETNS (European Telephony Numbering Space) - that touches on many matters which we believe you consider important, including standards, regulation, innovation and competition.

To put this in some context, we must first say something about RIPE (*Réseaux IP Européens*). RIPE is a collaborative multi-stakeholder forum completely open to all parties interested in the Internet in Europe and beyond. There are two RIPE meetings each year. At these meetings discussions take place in various working groups dealing with everything from IP addresses to various Internet governance issues. Some of these discussions result in defining the policy to be followed by RIPE NCC -- the Regional Internet Registry for this region. RIPE was probably the first - and is still perhaps the most respected - instance of Internet governance.

We, Patrik Fältström and Niall O'Reilly, are co-chairs of two separate RIPE working groups.

Patrik is one of two co-chairs of the RIPE Cooperation Working Group which attempts to bring government people into the RIPE environment.

Patrik is also one of the authors of the ENUM standard - a standard which allows any telephone number to be used like an Internet domain name. The number can then, just like any other domain name, be used to point to a range of independent services, including, but not restricted to, voice services.

Niall is one of two co-chairs of the RIPE ENUM Working Group which provides a forum for exchange of experience between those testing, piloting, or operating ENUM, or otherwise having an interest in this technology.

Between us we have therefore been following the discussions around a possible number code for telephony for the EU - ETNS - something similar to the already existing EU top level domain. We are aware that the Commission's interest in ETNS has extended over many years, and has included the commissioning of a number of studies.

A recent study was carried out by the consultants WIK. One option addressed in this study was to use "public ENUM". This may have been viewed by some (perhaps including the ITU?) as somewhat radical. One might guess that this view may have been behind the Commission's apparent decision not to go further with this approach.

Be that as it may, one of the issues with ENUM has been that those to whom blocks of telephone numbers are already allocated (primarily the incumbents) have for various reasons not been so interested in encouraging the public use of ENUM in their country and with their country code because that would give more of the control of how a particular telephone number could be used to the end user (the customer). Their reaction can be understood particularly from their own business perspective. The attitude of regulators is however less clear.

Any new number code for Europe however would not have any existing associated "incumbent". It could though be made immediately available for everyone in Europe. As ENUM is basically an Internet technology, deployment could be extremely simple. Just like the EU TLD it could start small and grow with demand. Number portability and similar functions that enable competition and innovation are built into the standard.

As ENUM has been discussed in RIPE for a number of years, and the question of a new number code for Europe is a "hot topic", we are sure that RIPE participants would like to hear your view concerning the European Commission's plans for use of this new number code, and how ENUM may then be used (if at all) for enabling new services like video conferencing and telephony, all hosted as a cloud service.

It would be wonderful if you had the possibility to be present at some point during the next RIPE meeting in Vienna in the autumn (31 October - 4 November), or indeed be represented, so that the community could hear your views on the future of telephony and specifically use of ENUM and the potential new country code for Europe. You would be most welcome.

Best Regards,

Patrik Fältström

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