

Directory Information Services And Products Consultative Paper

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Definitions

Authorised Provider

An authorised provider includes any person who holds a valid licence or permit to operate a telecommunications system or provides a telecommunications service under the Telecommunications (Regulation) Act, or is registered under the same Act as a person authorised as aforesaid.

Consent

Any freely given specific and informed indication of the wish of the data subject by which he signifies his agreement to personal data relating to him being processed.

Data Subject

A person to whom the personal data relates.

Data Controller

A person who alone or jointly with others determines the purposes and means of the processing of personal data.

Directory Enquiry Service (DQ)

Directory information service which is operator assisted and involves reference to a database.

Directory information

Forms of information including name, telephone number, address (it does not have to be a full address) customer type (business or residential), directory status and type of number (fixed, mobile, fax etc) where clearance has been obtained from service subscriber for the provision of such information.

Directory Information Product

Directories in printed or machine-readable format (e.g. CD-ROMs)

Directory Information Service

Any licit service used for the provision of directory information and may refer to both a directory enquiry service and an on-line directory information service.

Listed National Subscribers

All subscribers who have not expressed opposition to being listed, including fixed, mobile and personal numbers.

Personal Data

Any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to

an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

Classified Directory

A directory information service/product where customers are listed by business or trade category

1 Introduction

While the market for directory information products and services has obvious merits for telephone subscribers, it is as well an important element of the telecommunications industry serving to stimulate and facilitate the use of telecommunications services.

The current level of competition in the Maltese directory services market provides users with a wide variety of options. Operator assisted directory enquiry services are provided by all the telecommunications operators (i.e. Vodafone Malta Ltd, Go Mobile and Maltacom plc). Internet access and CD-ROM versions of both residential and business directory information is also available (exclusively for fixed line subscribers). While Maltacom is the only provider currently offering printed directories for fixed line telephony residential listings, other directory information providers offer classified directories.

In this consultative document, the Malta Communications Authority (“MCA”) is seeking the views of operators and the public on how the directory services market in Malta can be improved. The objectives of this consultation process are to:

- seek views on the price, choice and quality of directory information services currently available in the market,
- identify any barriers to entry or operational difficulties in the directory information market;
- examine the regulatory, technical and operational issues associated with the provision of directory services;
- ensure that competition can develop sustainably in the supply of directory information services in a way that maximises benefits to customers and subscribers; and
- establish a Code of Practice regulating Directory Information Services.

This consultative paper is not a legal document and is being published without prejudice to the legal position or the rights and duties of the MCA to regulate the market generally.

2 Legislative & Statutory Background

2.1 Telecommunications (Regulation) Act

Section 4 (1)(b) of the Telecommunications (Regulation) Act establishes the duty of the MCA to secure the provision of telecommunications services in Malta, including *inter alia* directory services, and to satisfy all reasonable demands for such services.

2.2 Telecommunications Services (General) Regulations – L.N. 151 of 2000

Regulation 29 of the Telecommunications Services (General) Regulations states that operators must provide upon request a directory information product and service to all their subscribers. This service may consist of the provision of a printed directory or a database that includes all the names of the operator's customers. Each subscriber has the right to have an entry in publicly available directories, to verify and if necessary correct it, and to request removal of the said entry and not to include such entry in the first place

Directory information on all subscribers who have agreed to be listed for such services be they fixed, mobile or personal numbers shall be available to users in a form approved by the MCA, printed, electronic, or in some other medium which shall be updated on a regular basis.

In order to encourage the availability of at least one comprehensive telephone directory covering all listed national subscribers, Legal Notice 151/2000 specifies that operators are to supply each other with required information relating to their respective subscribers. An operator may also charge end users a reasonable fee for making available directory information services. Furthermore, operators processing or in possession of subscriber data shall comply with relevant data protection legislation.

2.3 Data Protection Act

The Data Protection Act provides for the protection of individuals against the violation of their privacy through the processing of personal data.

This Act is of great relevance to the market for directory information products and services because of obligations placed on data controllers to ensure that such data is processed fairly and lawfully, that it is not processed for any purpose that is incompatible with that for which the information is collected and that the data processed is correct and up to date.

2.4 Relevant EU legislation on Directory Services provision.

The following paragraphs summarise the provisions of the relevant EU directives which the MCA aspires to transpose irrespective of Malta's eventual membership in the EU. These directives provide a regulatory framework which is suitable within the context of the present local scenario. To a large extent, much of the content of these directives already form part of our legislative framework.

To this effect the MCA would like the views of all interested parties to the adoption of some or all these directives with the objective of adopting a policy framework that enhances the provision of directory services.

2.4.1 Directive 98/10/EC on the application of open network provision to telephone and on universal service for telecommunications in a competitive environment

Article 6 states that Member States shall ensure that:

- a. subscribers have the right to have an entry in publicly available directories and to verify and, if necessary, correct or request removal of that entry;
- b. directories of all subscribers who have not expressed opposition to being listed, including fixed, mobile and personal numbers, are available to users in a form approved by the national regulatory authority, whether printed or electronic, or both, and are updated on a regular basis;
- c. at least one telephone directory enquiry service covering all listed subscribers numbers is available to all users, including users of public pay telephones;

In order to ensure provision of the services referred to above, Member States shall ensure that all organisations which assign telephone numbers to subscribers meet all reasonable requests to make available the relevant information in an agreed format on terms which are fair, cost oriented and non-discriminatory. This Directive also provides that Member States shall also ensure that organisations providing these services follow the principle of non-discrimination in their treatment and presentation of information provided to them.

2.4.2 Directive 95/46/EC on the protection of individuals with regard to the processing of personal data and on the free movement of such data

Article 11 is of relevance to directory services. This article requires that where a data user obtains data from a third party rather than directly from the data subject, the data user is to provide certain information (including his identity) to the data subject, unless the data subject already has it. This would, for example, apply to operators and independent service providers receiving directory information from an interconnecting operator. Clearly this requirement would represent a substantial

barrier to entry in the provision of directory information services if all customers needed to be re-contacted in such cases.

However, the Directive provides a number of exemptions from this requirement. One such exemption is where the recording or disclosure of data by a data user is expressly laid down by law. This exemption would cover operators who are required by licence to use directory data obtained from other operators to provide directory information services. Another exemption is where provision of such information involves disproportionate effort. Re-contacting all customers to obtain permission to use their directory information in ways that they had already consented to would likely be deemed to involve disproportionate effort. Therefore it is likely that independent service providers obtaining directory information for use in ways that customers already anticipated could take advantage of this exemption. In order to do so Member States must provide appropriate safeguards.

2.4.3 Directive 97/66/EC concerning the processing of personal data and the protection of privacy in the telecommunications sector

Subscribers to a Directory Service are afforded data protection in accordance with this directive. Section 11 of this Directive provides that subscribers' personal data contained in printed or electronic directories which are either available to the public or obtainable through directory enquiry services, should be limited to what is necessary to identify a particular subscriber, unless the subscriber has given his unambiguous consent to the publication of additional personal data. The subscriber is also entitled, free of charge, to be omitted from a printed or electronic directory at his or her request, to indicate that his or her personal data may not be used for the purpose of direct marketing, to have his or her address omitted in part and not to have a reference revealing his or her sex, where this is applicable linguistically.

Notwithstanding the above, Member States may allow operators to require a payment from subscribers wishing to ensure that their particulars are not entered in a directory. This is allowed provided that the sum involved does not act as a disincentive to the exercise of this right, and that, taking into account of the quality requirements of the public directory in the light of the universal service, it is limited to the actual costs incurred by the operator for the adaptation and updating of the list of subscribers not to be included in the public directory.

These concepts are echoed in the recent proposal for a European Directive concerning the processing of personal data and the protection of privacy in the electronic communications sector. This proposed Directive is intended to replace the Directive 97/66/EC. This directive is intended to adapt the existing legislative framework to encompass new developments in communications technologies.

One far-reaching proposal in this new directive would give subscribers the right to determine whether they are listed in a public directory and with which of their personal data. The previous default was to list all subscribers. Also this proposed directive provides added protection against unsolicited calls for direct marketing purposes.

3 Comprehensive Directory Information

Customers expect that directory information services and products are comprehensive, accurate, efficient and up-to-date. They may be disappointed when these are unavailable or when the quality of service is poor and not up to the expected standard.

3.1 Obligation to offer subscribers a directory listing

All authorised providers who provide a subscriber with a publicly available telephone service in respect of which a telephone number has been allocated must offer that subscriber an entry in a directory enquiry service and/or in a publicly available printed/electronic directory at no charge and must be given the right to verify and if necessary, correct or request the deletion of that entry, and the non insertion in the first place

3.2 Collection of directory information

3.2.1 Collection of subscriber information

Competition is unlikely to occur in the collection and compilation of directory information by the licensed operators. This task is likely to remain under the direct control of the relevant operators because this data is primarily collected for contractual and billing purposes. The raw subscriber information is the fundamental requirement for the provision of any directory service and therefore it will remain necessary to impose obligations on the operators regarding access to such information in order to promote competition.

3.2.2 Entry options in the operators' directory databases

Ideally, telephone subscribers are to be offered three choices with respect to how their subscriber details are held and disclosed:

- *Listed* – the subscriber's telephone number is listed in the telephone directory and disclosed on request through assisted directory enquiries.
- *Unlisted* – this option allows subscribers to have their telephone number disclosed through assisted directory enquires but the number is not published in the telephone directory itself.
- *Ex-directory* – this option excludes the subscriber's telephone number from both printed directories and assisted directory enquiry services.

In order to ensure a level playing field for all DQ providers whilst protecting the data protection rights of ex-directory customers, the MCA is of the opinion that there are no grounds for an authorised provider's own directory enquiry unit (particularly Maltacom's) to have access to ex-directory information which is not provided to other operators. **On this basis, operators shall be obliged to supply names and**

addresses but not telephone numbers of ex-directory customers to other directory providers in order to confirm to an enquirer that a customer is in fact, ex-directory.

3.2.3 Collection of Directory Information from pre-paid mobile telephony subscribers

Presently, new mobile subscribers are not obliged to reveal their personal details when purchasing a new pre-paid subscription but they are given the option to appear in their respective operator's directory enquiry service.

The MCA would like the mobile operators' opinion on whether the said operators should as a requirement collect the identity of all their network users including their pre-paid subscribers and ask them whether they want to have their numbers made available for directory information purposes.

This would also reduce the risk of the mobile phone being used illicitly. The MCA is aware that the collection of such information may prove to be a difficult task. However, the end result would be beneficial to all telecommunications subscribers, in that more users would have their names listed in a directory.

3.3 Obligation to maintain directory information and supply it to other authorised providers

Each telecommunications operator is obliged to maintain a complete and accurate database of its customers' numbers. Under the provisions of the Telecommunications Services (General) Regulations, this information must then be made available on request to all operators. All licensed operators may thus be able to obtain directory information from other licensed operators in order to establish their own directory database covering all listed national subscribers. Such information must be supplied free of charge on terms which are fair and non-discriminatory. All operators shall meet all reasonable requests to provide directory information to third parties wishing to set-up directory information services. All operators shall make public the fee they charge to disclose revised and completely updated information. Such a charge shall be cost-oriented, fair and non-discriminatory and shall be approved by the MCA.

It is important that operators agree on a standard format which could be used as a minimum requirement for the supply of directory information to one another. Any additional or special requirements would be by commercial agreement between the parties concerned. In the event of a dispute, the MCA would expect an operator's standard format to be followed. In the absence of such a format, the MCA will deal with any disputes on a case-by-case basis.

3.4 Obligation to update directory information

All directory information databases must be revised and completely updated at least once a month. The relative updates should also be shared with other service providers on a monthly basis.

4 The Market for Directory Information Products and Services

The choice of directory information services and products in Malta indicates that telecommunications services users have a number of options for accessing directory information. The MCA recognises that there is growing competition in this market and that a number of new players are interested in offering a variety of directory information services such as call completion and classified directory searches. In addition, the market for printed directories has also grown and there are a number of independent providers offering business, fax and e-mail directories. The choice of media in the publication of directory information has also developed. Internet and CD-ROM services are taking a growing share of the market for such services.

4.1 Obligation to provide a telephone directory enquiry service

Recent competition in the market has seen the mobile operators offering a directory enquiry service in competition to the service offered by Maltacom plc. The level and type of service provided depends on the access an operator has to the raw data of subscriber information, the technical and commercial arrangements agreed with the other telecommunications operators, and the infrastructure or technology in place to deliver the service.

Currently, a national directory enquiry service is offered by Maltacom, Go mobile and Vodafone, while an international directory enquiry service is offered only by Maltacom. Call centres operated by the different telecom operators provide assisted directory enquiry services to customers who dial the short access code in the ranges 118X for national DQ and 115X for international DQ.

All operators must make available to end-users who are connected to their network a directory enquiry service. The directory enquiry service must contain information on all subscribers in Malta who have requested a listing from their service provider.

Experience in other European countries has shown that by increasing the options available to customers as to how and for what purpose their personal details are held can help reduce the number of ex-directory customers. One such option is a call completion service whereby the directory enquiry operator does not give out the customer's number but connects the enquirer straight through to the customer and gives the customer the option of accepting the call. The price of the service would clearly need to cover both the cost of the directory enquiry search and the follow-on call and would therefore be more expensive than standard directory enquiry calls.

The MCA would like to obtain the views of the interested parties on whether call completion at the request of an ex-directory subscriber should be made available and any other options that should be considered.

4.2 Obligation to provide printed / electronic directories

Authorised providers may supply printed and/or electronic directories to end-users connected to their network. These directories must contain information on all their subscribers who have requested a directory listing from their telecommunications network. An updated telephone directory shall be supplied on an annual basis.

The Telecommunications Services (General) Regulations specify that a printed and/or electronic directory shall be made available as approved by the MCA. The MCA is of the opinion that Maltacom plc, in line with the monopoly it presently enjoys shall be the provider of the printed telephone directory.

All fixed telephony subscribers shall be supplied with a printed telephone directory. No charge shall be levied for the supply of a printed directory while a charge can be levied for an electronic version and extra copies. Alternatively subscribers may be offered a choice of one version either printed or electronic that will be provided free of charge. Where a charge is levied, this will be subject to prior MCA approval and must be based on cost recovery only. Directory information products shall be subject to the following:

- Quality and user-friendliness,
- Telephone numbers are to be in line with the new numbering plan,
- Directory shall include the prominent use of help-lines, emergency numbers, directory enquiries and single number corporate lines where hunting capabilities are in place,
- Government Departments and Ministries should be organised in a user-friendly fashion
- Final format to be approved by MCA,
- Complete updated format of entries.

The Telecommunications Services (General) Regulations also provide for the availability of directory information products which include fixed and mobile numbers. In this respect, the MCA would like the opinion of interested parties regarding the printing of a national telephone directory which includes fixed, mobile and any other service.

4.3 Potential Difficulties for Directory Products and Services Providers

Whilst welcoming the development of new innovative services by telecommunication operators and other new players in the market, the MCA is keen to elicit views as to the current state of competition in the market. Specifically, the MCA is seeking to identify whether there are any actual or potential barriers to entry in the market or whether there are operational difficulties that may hinder the further development of competition in this market.

4.4 Proposed Charges to subscribers

4.4.1 Tariffs for Directory Enquiry Services

The retail tariffs for Directory Enquiry Services as approved by the MCA shall be as follows:

Calls to National Directory Enquiries

DQ Number Called	Service Provider	Tariffs of calls from:		
		Go mobile	Maltacom plc	Vodafone
118 2	Maltacom p.l.c.	Per minute normal call mobile to PSTN	5c per call (revised to 10c after 1 year)	Per minute normal call mobile to PSTN
118 7	Go mobile	Per minute normal call on same network	Normal call PSTN to mobile	Per minute normal call on same network
118 9	Vodafone Malta Limited	Per minute normal call to Vodafone	Normal call PSTN to mobile	Per minute normal call on same network

Calls to International Directory Enquiries

Number	Service Provider	Tariff
115 2	Maltacom p.l.c.	15c per call*

* In case of an operator assisted telephone call connection, the operator assisted telephone call tariffs shall apply. This service is not accessible from mobile networks.

In the case of Maltacom plc, the charge for National and International Directory Enquiry services shall become applicable either on 01 January 2003 (coinciding with the end of Maltacom's monopoly on fixed line and international gateway services) or alternatively may become applicable once the new telephone directory is published. **The MCA would like to obtain the views of all interested parties on the above charges and their effective dates.**

5 Privacy Concerns of Individual Subscribers

5.1 Privacy Concerns

One of the main concerns of the MCA is that directory information should only be used in ways customers expect, unless data users have obtained customers' prior consent for other uses. When subscribers have an entry in the telephone directory and their directory information is made available through directory enquiry services, that information enters the public domain. Accordingly, there is a substantial risk that this information may be illicitly copied and misused. This risk increases where information is supplied electronically. Directory information is also likely to become increasingly globalised through the Internet, making it difficult to control unless there are adequate controls on the access, authentication and secure transmission of this data.

In this regard, the legislation outlined in Section 2 of this document provides clear guidelines on the use of personal data. In promoting a competitive market for directory services, the MCA is also keen to explore further options that could help maintain or even reduce the number of subscribers opting for ex-directory status. One of the most common reasons given by subscribers who opt for ex-directory status is to avoid unsolicited mail and telemarketing. One of the provisions in the Data Protection Act entitles the data subject to indicate that his personal information may not be used for direct marketing.

In order to ensure compliance with the Data Protection Act and in an effort to reduce the proportion of residential customers who opt for ex-directory status, the MCA proposes that all residential customers should be given the opportunity to opt out of their directory entry being used for direct marketing. In the case of new subscribers, this option can be exercised when their entry is being added to the database. For all existing customers there is the option of providing them with this choice through a national mail shot or the option of advertising such an option which can be taken up by all requesting customers.

The MCA is of the opinion that where a customer has exercised such a right, all directory databases and products derived from that entry should be clearly reflect the customer's choice. The MCA also believes that where customers opt to have their details excluded for the purpose of direct marketing, this right should be respected by all directory providers including the customer's own telecommunications operator.

5.2 Proposal for a Directory Information Services Code of Practice

The MCA wishes to ensure that operators develop adequate customer information and consumer protection procedures in order to assist the public in understanding the choices they will have and how the new services will work.

In addition, measures will need to be in place to protect customers from potential misuse of the directory service data. This will require the development of a Code of Practice. In considering the appropriateness of a common set of rules or code of practice for the use of directory information, the MCA needs to consider whether it is sufficient to rely solely on general data protection legislation to ensure that directory information is not misused. Otherwise may be more appropriate to apply a specific code of practice relating to the use of directory information which could also be in line with data protection legislation but at the same time triggering issues specific to directory information. This option will also require consideration of how such a code can be drawn up and implemented and the means by which such a code of practice could be enforced.

The Code of Practice needs to address the objectives of:

- providing clear rules about the uses of National Directory; and
- ensuring that all those using National Directory information to provide services and products to customers are subject to a common set of rules.

The MCA is of the opinion that the following specific issues should be included in such Code of Practice:

- a. A search for a telephone number using an electronic directory or a directory enquiry service should rely exclusively on the requirement to provide the approximate name, and the approximate address where appropriate, of the data subject being sought.
- b. Where the data subject's name, address and telecoms number is published or displayed in printed or electronic form it should be organised alphabetically by the data subject's surname.
- c. Where the data subject's name, address and telecoms number are published or displayed in printed or electronic form it should not be allowed to execute searches by address only, or to allow searches by reference to personal descriptors (including qualifications, titles), that are not part of the subscriber surname.
- d. A data subject's telephone number or address only may not be used to generate a name and/or address (i.e. reverse searching).
- e. A data subject's information that is publicly available must not be changed unless it is to correct an element of directory information, which is incorrect or misleading.

Certain measures adopted by licensees should reduce the likelihood of telecommunications directory information being misused and should aim to prevent activities such as:

- a. Bulk copying of telecommunications directory information, through measures such as:
 - restrictions on the number of records generated from a single search using electronic directories;
 - encryption of telecommunications directory information in electronic directories;
 - the absence of an on-line interface to data not specifically requested;
 - restrictions on the number of directory entries which can be copied and pasted from electronic directories
 - restrictions on bulk automated data-matching exercises, which would have the effect of populating third-party databases with subscriber telecoms details.
- b. Reverse searching of telecommunications directory information, through measures such as:
 - encryption of telecommunications directory information in electronic directories.
- c. Other misuse of telecommunications directory information, through measures such as:
 - ensuring printed directories contain a minimum number of data to prevent the publishing of a small printed directory which would enable searching by location without using a data subject's name;
 - ensuring all directories contain a clearly visible warning that the use of personal data for direct marketing purposes, without the consent of the individual in question (whether by way of reference to a central register of subscribers choice as to such use of their personal data, or through some other equivalent means), should not be taken as meeting the requirement set out in the Data Protection Act.

The MCA would like to seek the views of interested parties on whether a Directory Information Code of Practice should be developed along the above principles.

6 Proposed Universal Service Obligation and a National Database

Under the terms of Section 38 of the Telecommunications Services (General) Regulations, the MCA is obliged to designate an operator with a dominant market position to be a provider of universal services.

An operator having a universal service obligation shall supply the basic service to any person including users in high-cost areas or vulnerable groups such as the elderly, the disabled and people with special needs, on its usual terms and conditions, within a reasonable period of time and at an affordable price. Basic services shall include as a minimum the provision of operator assistance, emergency and directory enquiry services (including subscriber directories).

6.1 Provision of Directory Services

An operator designated as having a universal service obligation for the provision of directory services must, *inter alia*,

- ensure that one or more subscriber directories, setting out all subscribers of public telecommunications networks, including those with fixed, mobile and personal numbers, and who have not refused to be included in such directories, are available to users of any such networks in a form approved by the MCA, whether printed or electronic, or both and are completely updated at least once a year.
- keep a record of all subscribers in the country, including those with fixed, mobile and personal numbers, and who have not refused to be included in that record, and allow access to any information contained in such record to any person requesting such information.

The importance of access to directory services has meant that provision for such access is provided for in the legislative regime that was introduced in 2000. Whilst these requirements enable the provision of comprehensive directory services to end users, the universal service legislation may require that an obligation be placed on one organisation or person to provide the service.

The MCA is currently in the process of re-defining USO's and therefore this issue will be dealt with in more detail in another consultative process.

6.2 A National Database Industry Forum

Maltacom maintains the largest national database, which includes all fixed telephony numbers of subscribers who have not refused to be included in this database. The

legislation clearly outlines the obligation on all licensed operators to make available upon written request and in an agreed format on terms which are fair, cost oriented and non-discriminatory, the name, address and telephone number of each of its subscribers to the organisation/s designated by the MCA as having an obligation to provide directory services.

Whilst there has been very limited negotiation between the operators as to the agreed format, there would appear to be significant scope for further discussion amongst all parties to agree the most cost effective, workable format and specification that satisfies the objective of the national database in facilitating the provision of a comprehensive directory service. The MCA believes that negotiation and agreement between all data suppliers and directory users is necessary to promote a fully functional and effective national database, which includes all telephony numbers both mobile and fixed.

The MCA therefore suggests that an industry-working group is tasked with defining the objectives, specification and operational procedure of the national database. In particular, the forum could be used to discuss:

- the specification,
- the process for conforming data to the specification,
- contractual issues relating to the use of data, and
- any relevant data protection considerations

Where agreement cannot be reached between parties on any of the matters relating to the national database and its use, these matters can be referred to MCA for resolution.

6.3 Submissions to the National Database

The MCA believes that the operators and directory providers are best placed to agree the precise format of subscriber information to be submitted to the national database and also that the data should be as easily accessible and unbundled as possible in order to ensure that the national database is the most comprehensive database of subscriber information in the country.

Where operators do not comply with their obligation to provide directory data to the national database, the MCA is prepared to take the necessary regulatory action.

7 Quality of Service

Typically, the most common complaints from residential customers in relation to the published telephone directory would usually relate to incorrect and missed entries in the published directory. These can include omissions from the directory or inclusions where the customer has specifically requested an ex-directory number. The obligation is on the directory provider to ensure that the wishes of their subscribers are complied with in relation to inclusions or omissions from the directory and that systems are in place to ensure the minimum number of errors or missed entries. Complaints relating to directory services are one of the measured licensed operator performance indicators that the MCA will be collecting in 2002.

In addition, to the extent of supplying a reliable directory enquiry service to consumers, service providers offering such a service shall make available to the MCA the following information on a monthly basis:

- Total number of calls to Directory Enquiry Service
- Mean time to answer for the period
- Mean holding time
- Total number of telephone number look-ups performed
- Number of unsuccessful look-ups
- Failure rate for Directory Enquiry look-ups
- Average number of look-ups per Directory Enquiry call.

The MCA would like the opinion of the general public on the quality they expect from an efficient directory enquiry service and any improvements they deem necessary from existing directory services. The MCA would also like to request from operators, additional quality and performance targets needed to improve the existing service.

8 Consultation Framework

The MCA wishes to invite comments from interested parties in relation to any of the issues raised in this document.

8.1 Consultation Period

The consultation period will run until 12.00pm on Friday, 15 March 2002. Comments should be sent to:

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Written comments will be made publicly available at the MCA unless confidential. Respondents are therefore asked to separate out any confidential material into a clearly marked annex. Respondents are also kindly requested to refer their comments to the specific sections of this document.

8.2 Finalisation of the Authority’s Position

The MCA will consider comments received in response to this consultative document before publishing a final decision notice concerning Directory Information Products and Services.