

Case T-037

Directory Information Services: strategic review of regulation

Non-statutory Draft Decision for consultation

Document No: JCRA 23/30 Publication date: 27 July 2023

Date to respond: 25 August 2023

Jersey Competition Regulatory Authority 2nd Floor Salisbury House, 1-9 Union Street, St Helier, Jersey, JE2 3RF Tel 01534 514990

Web: www.jcra.je

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1 Overview and summary

- 1.1 The duties of the Jersey Competition Regulatory Authority (the **Authority, we, us** or **our**) include monitoring the development of telecoms systems, technology and demand, and assessing whether potential changes, advances or trends may affect Islanders.
- 1.2 Directory Information Services (DIS), which broadly allow users to find telephone numbers of people or organisations they want to call, are one service group being affected by recent developments in telecoms systems, technology and demand. Through complaints received in the past we know this trend has affected some Islanders while our understanding of broader market conditions makes us aware that Islanders are likely to be further affected in the future.
- 1.3 Class II and Class III telecoms licences we issue contain a specific licence condition (shown in Annex A) setting out regulatory expectations on the provision of DIS in Jersey. We are aware that technical, competitive and commercial arrangements associated with the provision of local DIS have fundamentally changed since the present licence conditions were created, leaving us with only limited regulatory options to ensure the continued provision of DIS in the Island.
- 1.4 In view of this we decided to carry out a strategic review of regulation relating to DIS (the DIS Review), to decide whether we should amend licence conditions to reflect the changing situation. We could increase obligations on Licensed Operators (LOs) to protect the provision of local DIS, for example, or remove obligations in view of decreasing DIS usage.
- 1.5 To help inform our decision-making, we issued a Call for Information consultation (the Call for Information) in December 2021¹ to gauge stakeholder views. Additionally, we made specific requests for information from LOs to understand local usage patterns and service provision structure, and commissioned market research to more widely assess the views of Islanders.
- 1.6 Our key findings from the consultation responses, information received and market research is that:
 - (a) While LOs are experiencing a decline in demand, there are no indications that the availability of local DIS will change imminently;
 - (b) A significant majority of Islanders are satisfied with the quality of DIS presently available to them and believe they represent good value for money. And a significant minority believe it is important they continue being available for use in the future; and
 - (c) Recent changes in the commercial arrangements and processes underpinning the provision of local DIS significantly limit the opportunity to fully protect local DIS through regulation.

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¹ Document No. JCRA 21/50 Case T-037 Directory Information Services: strategic review of regulation Call for information – see https://www.jcra.je/cases/2021/t-037-directory-information-services-review/t-037-directory-information-services-review-call-for-information/

- 1.7 In view of these findings, we have taken a non-statutory Draft Decision (the **Draft Decision**), which is:
 - (a) That amending the existing licence conditions to increase protection of local DIS at this time would be disproportionate in view of present usage levels, the degree of present Islander satisfaction with DIS and the likelihood of ensuring effective protection because of the significant changes in the provision of local DIS;
 - (b) That reducing or removing the existing regulatory obligations placed on LOs at this time would be inappropriate in view of the continued use of DIS and views of Islanders. While the existing licence conditions are limited, they do provide the Authority with a basis upon which to review customer concerns with LOs;
 - (c) That the Authority has therefore provisionally decided to leave existing licence conditions in place, but will consider reviewing again in the future and may do so specifically if there is public or other demand to do so; and
 - (d) That the Authority will further write to LOs reminding them to continue cooperating on the provision and sharing of DIS information and to inform the Authority if there are any plans to change present services.
- 1.8 This document sets out the details of this Draft Decision and the basis upon which it is made. It is published for consultation, with comments welcomed from interested parties by 5.00 pm on 25 August 2023. If there are no substantive comments received by then, we will consider this Draft Decision as our Final Decision on this case and take no further action at this time. Details on how to respond are shown in section 6.3.

2 Introduction and background

- 2.1 This section introduces the DIS Review and summarises relevant background information explaining approach and activities to date. Its contents are:
 - Background to the Review
 - Information taken into account
 - Legal framework
 - Process and timetable

Background to review

- 2.2 DIS have been an essential element of public telecommunications for over 100 years, allowing users to find telephone numbers of people and organisations they want to call. Delivery and demand has been changing in recent years, however, driven by new technology such as internet search engines, substitutive applications such as mobile handset contact lists and environmental concerns over matters such as the impact of printing telephone directories.²
- 2.3 Alongside our specific duties to monitor the development of telecoms systems, technology and demand, and assessing whether potential changes, advances or trends may affect Islanders, we have an overarching strategic goal to safeguard consumers.³ In view of this and the changing situation explained in section 2.2 above, we decided to review the regulations associated with the provision of DIS to consider whether they potentially needed amending, increasing or reducing.
- 2.4 We began this review in December 2021 with a Call for Information within which we defined DIS as being:

Telephone directory enquiries	Where a user speaks to an operator to gain information about a telephone number. Provided by JT via calling 118534, for example, or BT via 118500.
Paper directory	Printed publication typically containing 'white pages' with subscriber telephone numbers and 'yellow pages' with advertised business numbers. Provided in Jersey by Yabsta Limited as the 'Jersey Directory', for example, or BT in the UK as 'The Book'.
Online directory enquiries	Where a user searches for information about telephone numbers via a website. Provided in Jersey at www.jtdirectory.com, for example, or in the UK at www.thephonebook.bt.com.

² Several reports exist showing a declining trend in UK DIS usage call – for example, see Ofcom directory enquiries review (Nov 2018) https://www.ofcom.org.uk/__data/assets/pdf_file/0017/128420/Directory-Enquiries-118-Review-statement.pdf.

³ JCRA Strategic Plan Goal 3 – see https://www.jcra.je/strategic-plans/strategic-plan/strategic-plan/

Information taken into account

- 2.5 The Call for Information was open to all stakeholders including members of the public, and we actively tried to encourage responses from among groups and organisations considered to have a potential interest in the future of local DIS. These included Jersey Business, Jersey Chamber of Commerce, Age Concern and the Constables Committee. A summary of consultation responses is shown in section 4 with non-confidential versions issued on our website alongside this report.
- 2.6 We further asked LOs to provide any relevant information on present DIS usage trends and to explain present contractual and commercial relationships covering the provision of DIS in Jersey and the parties involved. This information (the **Service Information**) is partly summarised in section 3.9, referred to in section 4 with further details shown in Annex B.
- 2.7 In view of a limited response from Islanders to our Call for Information, we also decided to carry out market research to gain a fuller insight of public understanding, usage and perception of DIS (the Market Research). This information is referred to in section 4 with further details in Annex C.

Legal context

- 2.8 The Telecommunication (Jersey) Law 2022 (the **Law**) sets out the primary duty of the Authority is to perform its functions as to ensure that telecoms services are provided that satisfy all current and prospective demands for them.
- 2.9 Article 7 of the Law includes a specific Authority duty to: '...protect and further the short-term and long-term interests of users within Jersey of telecommunication services and apparatus...'.

The process we follow and planned timetable

2.10 The present timetable, which may be subject to change, for completing this case is:

Dec 2021	Issue Call for Information
Jul 2023	Issue non-statutory Draft Decision relating to DIS regulation
Aug 2023	Confirm non-statutory Final Decision relating to DIS regulation

3 The provision of DIS in Jersey

- 3.1 This section provides contextual information on the provision of local DIS. Its contents are:
 - Historic service development
 - The regulation of DIS in Jersey
 - Present DIS provision in Jersey

Historic service development

- 3.2 Prior to 2003, callers in the UK and Jersey dialled short code 192 to find local and national numbers and 153 for international numbers, with BT providing the telephone directory enquiries service in the UK and JT⁴ in the Island. In 2003, UK communications regulator Ofcom deregulated the service, creating the 118xxx number range and licensing numerous companies to provide telephone directory enquiry services. In Jersey, JT continued to offer its service, now using access number 118534, while Islanders could also access other UK-based telephone directory enquiry services.
- 3.3 In 2012, JT launched an online directory service using the URL www.jtdirectory.com, providing advanced number and information search capability accessible from both fixed and mobile devices.⁵
- 3.4 Printed phone books first appeared in the UK during the latter years of the 19th century. BT launched the modern format Phone Book in 1984 and developed to combine a mix of residential, business and classified adverts.⁶ In Jersey, there was an equivalent publication containing local numbers that developed to become the Jersey Telephone Directory issued by JT.
- 3.5 In 2018, JT sold 100% of certain directory service assets to Yabsta, ⁷ a Guernsey registered company specialising in traditional print media and digital services. ⁸ The sale included:
 - Customer contracts for advertising in the printed and online directories;
 - Existing directory supplier relationships; and
 - Ownership of <u>www.jtdirectory.com</u>.
- 3.6 Following liberalisation of the local telecoms market in 2002, JT subsequently developed a reference interconnect offer (RIO), which provided access to various wholesale services to other

http://www.digitalarchives.bt.com/CalmView/GetMultimedia.ashx?db=Persons&type=default&fname=Info_sheet_9_British_phone_books.pdf

⁴ Called Jersey Telecoms at the time, but referred to as JT throughout this document for ease of understanding.

⁵ See https://www.blglobal.co.uk/BusinessNews.aspx?id=jt-launches-online-yellow-pages

⁶ See BT Group Archives -

⁷ For more information see https://www.yabsta.com/

⁸ Approved by the Channel Islands Competition and Regulatory Authority (CICRA) under competition law requirements on 20 July 2018 – see CIRA document number 18/31 (https://www.jcra.je/cases/2018/m1396j-yabsta-jt-directory-services/)

licensed operators (**OLOs**). This includes a service allowing OLOs to include their customers' information in local DIS.

The regulation of DIS in Jersey

- 3.7 The Law defines a 'Directory Information Service' as a telecommunications service accessible from a telecoms system, but goes no further in defining types of DIS service.⁹
- 3.8 Both Class II and Class III licences have identical provisions on DIS services (shown in Annex A), which require licensees to compile and maintain directory information on their subscribers, make that information available to other requesting licensees, but, crucially, do not compel any operator to provide local DIS services nor maintain an island-wide directory information database.

DIS provision in Jersey and the application of regulations

3.9 As a result of the historic service development outlined in sections 3.5 and 3.6 above, the following organisations have a role in the provision of local DIS:

Organisation	ganisation Role			
ВТ	The wholesale division of UK communications provider BT operates the BT Directory Solutions OSIS (Operator Services Information System) Database, which is the UK's central repository for directory entries and accessed on a commercial basis by companies providing DIS services. ¹⁰	No		
KCOM	An independent UK communications provider ¹¹ contracted by JT to manage JT's Directory Information Database which contains Jersey's directory entries. KCOM provides the database directory enquiry information including updates entries to BT for inclusion in OSIS.	No		
JT	Class III LO in Jersey that processes local directory entry information including new entries, amends and deletions, received both from its own customers and those of OLOs. JT provides these changes in a daily update to KCOM for inclusion in the JT Directory Information Database.	Yes		
OLOs	Class II LOs that interconnect with JT through JT's RIO can use JT's service to add, amend or delate numbers of their	Yes		

⁹ For more information see https://www.jerseylaw.je/laws/current/Pages/06.288.aspx

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¹⁰ For more information see https://www.btwholesale.com/products-and-services/voice/directory-solutions-osis-database.html#handbook-and-technical-documents

¹¹ For more information see https://www.kcom.com/

Organisation	Organisation Role		
	subscribers to the report JT sends to KCOM, for inclusion in the JT Directory Information Database.		
Yabsta	Under a commercial arrangement with JT, international digital marketing and technology solutions provider Yabsta Limited accesses the directory entry information JT provides to KCOM and uses this to provide www.jtdirectory.com and the printed Jersey Directory.	No	

4 Consideration of consultation responses and other information

- 4.1 This section contains our analysis of relevant information received through the Call for Information consultation, the Service Information received and results of the Market Research and conclusions arising. Its contents are:
 - Consultation approach and responses received
 - Consideration of responses to consultation received and other information

Consultation approach and responses received

4.2 On 2 December 2021, the Authority issued a Call for Information consultation with respondents asked to consider seven questions:

Question 1: Do you have any comments on the Authority's plan to carry out a review of local Directory Information Services?

Question 2: Do you have any comments on the Authority's definition of Directory Information Services for the purpose of this review?

Question 3: Do you have any comments on local Directory Information Services and whether or not the Island is well-served by the present range available?

Question 4: Do you have any views on the importance or otherwise of maintaining Directory Information Services within the Island, now or in the future?

Question 5: Do you have any views on the existing regulation relating to local Directory Information Services and its suitability for present and future regulatory purposes?

Question 6: Do you agree the Authority's duties under the law require it to carry out the planned review? If not please set out your reasons why and propose any alternative approaches you believe the Authority should take.

Question 7: Do you have any comments on the Authority's planned purpose and approach in carrying out a strategic review of local Directory Information Services?

- 4.3 The consultation closed on 28 January 2022, with responses received by that date from the following organisations:¹²
 - Clear Mobitel (Jersey) Limited (Clear)
 - Jersey Airtel Limited (Airtel)
 - JT (Jersey) Limited (JT)
 - Sure (Jersey) Limited (Sure)

¹² Non-confidential versions of responses are published on the Authority's website alongside this document.

- Public responses x three
- 4.4 We are grateful to all respondents for the time and care taken to provide comments and views on this important subject. Having carefully considered them, this document contains our analysis of responses and conclusions drawn from each.

Consideration of responses to consultation questions and other information

Question 1: Do you have any comments on the Authority's plan to carry out a review of local Directory Information Services?

Summary of responses and other information

4.5 Airtel did not see a need for the review, but Clear, JT and Sure were broadly supportive of our actions in this area.

Our analysis

4.6 While respecting Airtel's point, we found broad support for carrying out the review.

Our conclusion(s)

4.7 We decided to continue the review of DIS, though considering it a lower priority case in view of other commitments and consultation responses.

Question 2: Do you have any comments on the Authority's definition of Directory Information Services for the purpose of this review?

Summary of responses and other information considered

4.8 Clear, JT and Sure broadly agreed with our definition while noting that customers additionally have access to similar information through search engines, such as Google, or via social media.

Our analysis

4.9 We accept the points made on availability of alternative web-based search applications, which is one of the key reasons for declining demand for DIS. However, the focus of our review needs to remain on those DIS defined by this review, which are made available through specific processes requiring the involvement and systems of local LOs and which may be broadly covered by existing regulation and licence conditions.

Our conclusion(s)

4.10 We believe our definition of DIS is appropriate for the purpose of this review, and will not specifically expand to include alternative options.

Question 3: Do you have any comments on local Directory Information Services and whether or not the Island is well-served by the present range available?

Summary of responses and other information considered

- 4.11 Clear noted that including customer information from OLOs alongside that of JT would improve the printed paper directory.
- 4.12 JT believes customers are well-served by DIS at present and have additional options to find information including through the use of smartphones, internet access and social media. JT further points out that demand for its DIS is declining year-on-year.
- 4.13 Sure believes that Jersey's small market size could make the provision of local DIS more commercially viable, which provides an incentive for JT to continue providing its present range, which Sure would welcome.
- 4.14 The Service Information shows that Islanders continue to have access to a wide range of DIS, both locally provided and nationally available and reveals the relatively complex commercial arrangements in place between both regulated and non-regulated entities to provide local DIS, and by derivation to ensure local numbers are available to national DIS providers.
- 4.15 The Market Research shows that the majority of survey respondents are satisfied with the quality of DIS available to them, with over 85% scoring five or more on a scale of one to ten when one is very poor and ten is excellent. And the majority also rate them as good value for money, with over 80% scoring five or more on a scale of one to ten when one is very poor and ten is excellent.

Our analysis

- 4.16 We concur with JT's view that Islanders are presently well-served by DIS, which is underlined by the level of customer satisfaction found by the Market Research, and with Sure's point that the Island's relatively small size and demographics could help ensure a continuation of service provision after elements disappear from larger jurisdictions.
- 4.17 We believe that the present commercial arrangements and processes underpinning the provision of local DIS appear to be serving Islanders well, again as underlined by the reported level of customer satisfaction, and that there are no indications that the availability of local DIS will change imminently.

Our conclusion(s)

4.18 There is no urgent or immediate need for us to intervene at the present time to protect or improve the availability of local DIS.

Question 4: Do you have any views on the importance or otherwise of maintaining Directory Information Services within the Island, now or in the future?

Summary of responses and other information considered

- 4.19 Noting that take-up of DIS is extremely low and declining among its customers, Airtel states the move to data-centric services will reduce the requirement to maintain DIS in the future.
- 4.20 Clear focuses on what it believes are limitations with the present JT service.
- 4.21 Noting several factors leading to a declining importance and relevance, JT states that the need to maintain DIS is less important as customers source contact information through alternative services and applications. JT further focuses on questions over the future of printed directories in particular, noting trends in other jurisdictions and environmental sustainability considerations.
- 4.22 Sure believes that the printed directory remains an important resource, but to a lesser extent than previously, and that LOs should not be obliged to provide or publish numbers by default.
- 4.23 Public respondent #1 believes it important that DIS are maintained to allow Islanders to discover and get in touch with local businesses, proposing a shared technical solution to help facilitate this. Public respondent #2 states that the printed telephone directory is essential for their use and for other Islanders without an internet connection. Public respondent #3 strongly believes that printed directories should no longer be permitted in view of climate emergency concerns.
- 4.24 The Service Information, which encompasses usage data solely from telephone directory enquiries confirms a declining local trend, revealing that calls reduced from just under 7,000 in 2020 to around 4,500 in 2022, a decline of approximately 36% in three years.
- 4.25 The Service Information also shows that subscribers to JT's Primetalk tariff, which is only available to older age group Islanders, are disproportionally high users of telephone directory enquiries. However, in common with overall usage, there is a marked decline in the number of Primetalk customers using telephone directory services over the last three years.

4.26 Our Market Research shows that:

- Islanders continue to use DIS, with the most popular option being online directory enquiries, which is the preferred choice of most survey participants and accessed at least monthly by 39%. The paper directory is next most popular, being the preferred choice of just under a quarter of survey participants and accessed by 33% at least monthly. Least popular is telephone directory enquiries, preferred by less than 5% of survey participants.
- Finding the phone numbers of businesses is the most popular reason for using DIS followed closely by those of Islanders and those of organisations. A lesser number use them to access addresses and lesser still to find business / trade details and maps.
- The majority of survey respondents believe DIS remain important to them, with 67% scoring five or more on a scale of one to ten when one is not important and ten is extremely important. A similar percentage believe that DIS remain important for Jersey, with 70% scoring five or more on a scale where one is not important and 10 is very important.

Our analysis

- 4.27 We welcome all views on the matter of maintaining DIS and concur with those stating that usage of DIS is changing and specifically declining in some areas. We believe this trend will continue in the future and most likely affect telephone directory enquiries and the printed directory.
- 4.28 We also understand there will be contrasting views on the need to maintain a local printed directory, with some Islanders potentially older age groups less comfortable using online directory services feeling strongly that a physical publication is essential while others question the environmental impact of printing and distribution.
- 4.29 While noting that a significant minority of Islanders continue to use DIS and that a significant majority continue to personally value the availability of DIS or recognise their value to the Island, we acknowledge that declining usage and/or preference trends are likely to impact on the continued commercial viability and availability of some local DIS at some point in the future, which may result in service diminishment or cessation.

Our conclusion(s)

4.30 We will seek to ensure the continued availability of local DIS while Islanders continue to use and value the services, particularly because a high percentage of users of specific DIS are likely to be more vulnerable older age groups.

Question 5: Do you have any views on the existing regulation relating to local Directory Information Services and its suitability for present and future regulatory purposes?

Summary of responses and other information considered

- 4.31 Airtel states that in view of usage patterns, providing DIS should no longer be a mandatory licence requirement.
- 4.32 Concurring there is some ambiguity in the licence condition, Clear questions whether the Authority made changes at some point removing inclusivity from JT's DIS.
- 4.33 JT agrees with the Authority's interpretation that the present licence condition relating to DIS does not specifically oblige any operator to provide local DIS. JT further notes that while its historic position as formerly sole provider of telecoms services in Jersey automatically led to centralisation of subscriber directory information, this has changed to only holding data relating to its retail customers.
- 4.34 The Service Information shows that since the existing regulations came into force, there have been significant and relatively complex changes in the commercial arrangements and intercompany processes used to provide local DIS and ensure local numbers are available in national DIS. Local DIS are now provided by a combination of companies rather than just JT, including regulated and non-regulated entities.

Our analysis

- 4.35 Referring to Clear's point specifically, the Authority is not aware of previous regulatory changes to JT's licence obligations.
- 4.36 We are not persuaded by Airtel's view that providing DIS should no longer be a mandatory condition while usage is declining, the Market Research shows significant reliance on and support for DIS.
- 4.37 However, we take the following points into account when considering whether it is necessary to increase regulatory protection to ensure the longer-term continued availability of DIS:
 - (a) That usage of telephone directory enquiries is low and rapidly declining, potentially even among older age group Islanders. Introducing any new regulations to ensure continued availability seems disproportionate in view of this; and
 - (b) While the printed directory continues being used by a significant minority of Islanders, it is provided by a private, non-regulated company presumably on a purely commercial basis. Attempting to regulate this company would be problematic at least, while using regulation to oblige an LO to provide a local printed directory could be considered draconian and counter to sustainability trends; and
 - (c) The significant changes in arrangements and processes to provide local DIS present considerable challenges to creating new regulation and could be seen as disproportionate given the present level of Islander satisfaction with DIS and obviously declining usage trends.

Our conclusion(s)

4.38 We will not amend licence conditions at this time to ensure protection of the long-term availability of local DIS, but may consider this again in the future if there is public or other demand to do so.

Question 6: Do you agree the Authority's duties under the law require it to carry out the planned review? If not please set out your reasons why and propose any alternative approaches you believe the Authority should take.

Summary of responses and other information considered

- 4.39 Airtel reiterated its view that there is no requirement to carry out the review.
- 4.40 Clear notes that the Law provides the Authority with a broad remit to review the telecoms market.
- 4.41 JT supports the review of DIS, which it considers the Authority possesses necessary powers to carry out.
- 4.42 Sure supports the Authority's review, but not as a high priority.

Our analysis & conclusion(s)

4.43 The Authority welcomes responses to this question, concurring that the review is compatible with its duties under the law.

Question 7: Do you have any comments on the Authority's planned purpose and approach in carrying out a strategic review of local Directory Information Services?

Summary of responses and other information considered

- 4.44 Airtel reiterated its view that there is no requirement to carry out the review.
- 4.45 Clear notes that a review of DIS is relevant, and that the Authority should ensure it has a thorough understanding of service usage, suggesting a public survey may ensure a widely representative view.
- 4.46 JT supports the Authority's purposes in carrying out the review.
- 4.47 Sure supports the Authority's purpose and scope.

Our analysis & conclusion(s)

4.48 The Authority welcomes responses to this question, concurring that planned purpose and approach in carrying out a strategic review of local DIS remain relevant.

5 Draft decision and next steps

- 5.1 This section sets out the non-statutory Draft Decision made by the Authority. Its contents include:
 - Draft decision
 - Next steps

Draft decision

- 5.2 Mindful of its duties, policies and practices, and taking into account the responses received to its Call for Information and other relevant information, the Authority's non-statutory Draft Decision is:
 - (a) That amending the existing licence conditions to increase protection of local DIS at this time would be disproportionate in view of present usage levels, the degree of present Islander satisfaction with DIS and the likelihood of ensuring effective protection because of the significant changes in the provision of local DIS;
 - (b) That reducing or removing the existing regulatory obligations placed on LOs at this time would be inappropriate in view of the continued use of DIS and views of Islanders. While the existing licence conditions are limited, they do provide the Authority with a basis upon which to review customer concerns with LOs;
 - (c) That the Authority has therefore provisionally decided to leave existing licence conditions in place, but will consider reviewing again in the future and may do so specifically if there is public or other demand to do so; and
 - (d) That the Authority will further write to LOs reminding them to continue cooperating on the provision and sharing of DIS information and to inform the Authority if there are any plans to change present services.

Next steps

5.3 The Authority invites written views and comments on the non-statutory Draft Decision contained in this document and the basis upon which it is made. All responses to this Non-statutory Draft Decision should be submitted in writing, clearly marked 'T-037 DIS Review', and received by the Authority before 5.00 pm on 25 August 2024. Submissions can be sent by email to info@jcra.je or alternatively in writing to:

Jersey Competition and Regulatory Authority
2nd Floor Salisbury House
1-9 Union Street
St Helier
Jersey
JE2 3RF

5.4	If there are no substantive comments by then, we will consider this Draft Decision as our Final Decision on this case and take no further action at this time.			

Annex A: Class II and Class III DIS licence condition

15 DIRECTORY INFORMATION

- 15.1 The Licensee shall ensure that Users have access to Directory Information Services and operator-assisted services offered by the Licensee and any Other Licensed Operator who is obliged to provide such services.
- 15.2 The Licensee shall, at its own expense:
 - (a) maintain a complete and accurate database of its Subscribers' Numbers and make
 the data available to Other Licensed Operators who become obliged to provide
 Directory Information Services (but only to facilitate the provision of Directory
 Information Services);
 - (b) co-operate with all such Other Licensed Operators in the supply or compilation of comprehensive and accurate directory information;
 - (c) not use any directory information provided to it by any Other Licensed Operator for any purpose other than for providing Directory Information Services unless specifically authorised to do so by the Other Licensed Operator concerned; and
 - (d) provide access to a range of Directory Information Services in order to provide subscribers with a choice of services to be compliant with the Numbering conventions or as directed by the JCRA.
- 15.3 The Licensee shall comply with the applicable laws covering the protection of data.

Annex B: Analysis of local DIS usage trends

Extracted from information received from Airtel, JT and Sure.

1. Calls to Telephone directory enquiries (1)

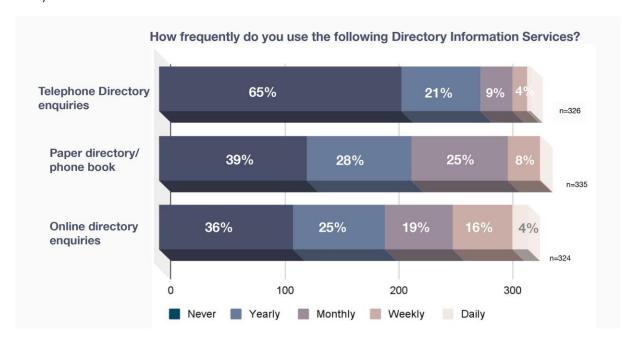
Source	Calls			Three-year
	2020	2021	2022	trend
Total	6,997	5,260	4,511	-36%

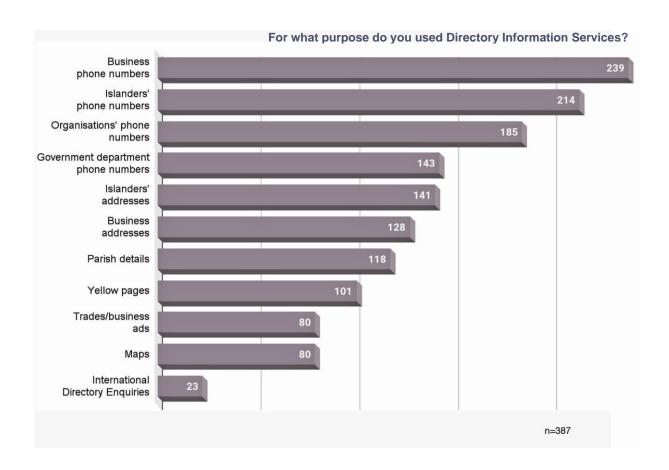
Notes

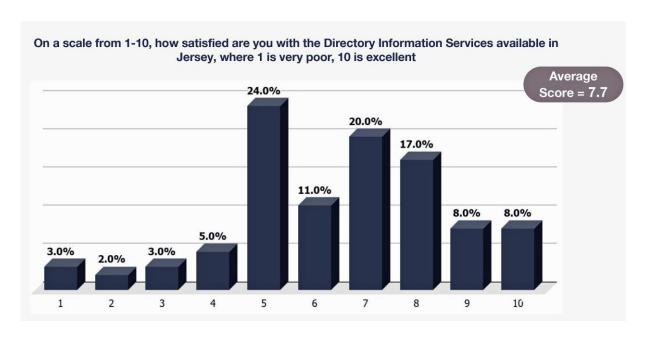
(1) Total of all calls from LO's customers to telephone directory enquiries numbers - i.e. 118xxx.

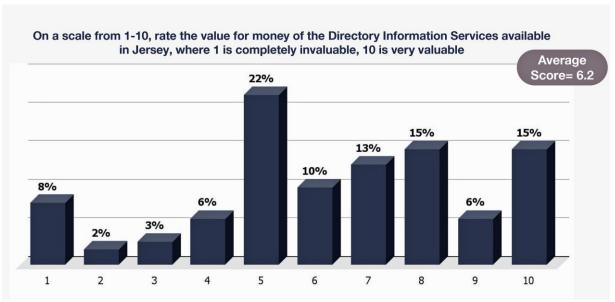
Annex C: Analysis of local DIS market research

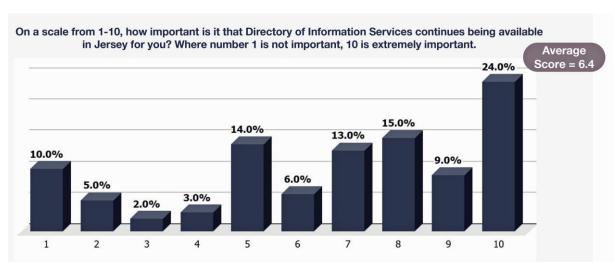
Extracted from market research conducted in 2022, which received 387 responses to a structured survey.











Analysis of local DIS market research (continued)

