



Non-Confidential Version

Consultation: Numbering Regulations

Twilio's Response to the Review by Ministry of Local Government and Modernisation

15 October 2021



1. About Twilio

- 1.1 As a leading global Communications Platform as a Service (**CPaaS**) provider, Twilio provides services to more than 235,000 enterprises globally and powers more than 1 trillion interactions between them and their customers every year.
- 1.2 Twilio's software allows customers to communicate with their customers over voice, SMS, messaging, or email thanks to the communications feature that companies have added into applications across a range of industries, from financial services and retail to healthcare and non-profits.
- 1.3 For instance, Twilio powers the communications for New York City's contact tracing initiative. The services enable city authorities to communicate with COVID-19 patients, educate them on the virus, and identify their close contacts through self-reporting. The platform also provides messaging-based alerts using Twilio Voice, SMS, email or WhatsApp that prompt patients to fill out secure surveys on their symptoms.
- 1.4 In Europe, Twilio serves a number of global customers as well as Government organisations and many of Twilio's customers are also small and medium-sized enterprises and Twilio's non-profit arm, Twilio.org, supports charitable organizations to deliver their communications needs.

2. Executive Summary

- 2.1 Twilio welcomes the opportunity to provide feedback on the Ministry of Local Government and Modernisation's (the Ministry) consultation on changes to the Numbering Regulations as part of a broader consultation on a new Electronic Communications Act and new Electronic Communications Regulations.
- 2.2 Telephone numbers are key to our customers and the communications platform as a service we provide them. Our customers rely on telephone numbers to identify themselves to the persons they call and message. Parties receiving calls and messages want to know that the person that is calling and messaging them are who they say they are. Our customers view telephone numbers as an important identifier that supports their businesses and brands. Twilio is acutely aware that in order for our customers' businesses and brands to flourish, trust in telephone numbers is required by the entire ecosystem - businesses that make calls and send messages, persons that receive calls and messages, and electronic communications services providers that facilitate these exchanges.
- 2.3 The Number Regulations are an essential document that lays out the rules and regulations in relation to telephone numbers, and Twilio is pleased to have the opportunity to comment on the proposed changes.
- 2.4 Twilio welcomes the clarification by the Ministry that numbers can be sub-assigned by a provider that has been granted those numbers by the national regulatory authority.



- 2.5 One area that we believe does require some reconsideration however is the fact that subsequent sub-assignments to other providers would be prohibited “in order to ensure transparency and effective supervision.”
- 2.6 Twilio believes that subsequent sub-assignments should be allowed and suggests that there are possible mechanisms to provide for the transparency and effective supervision that the Ministry requires. These are addressed below in our comments on the text.
- 2.7 Please do not hesitate to refer any questions or remarks that may arise as a result of our comments to:

Twilio Ireland Limited
Address: 25-28 North Wall Quay, Dublin 1 Ireland
Attention: Twilio Global Regulatory Affairs
Email: regulatory-notices@twilio.com

3. Twilio's Comments

- 3.1 Twilio believes that one of the most important changes to the Numbering Regulations is the specification as to how numbers may be onward distributed from providers who have been granted those numbers by the regulator. Twilio notes that section 19 as amended would provide as follows:

Section 19. Permission, use, and redistribute 8- and 12-digit numbers

Nkom may grant permission to use 8- and 12-digit number sequences to providers of public number-based electronic communication services upon application.

The provider assigns 8- and 12-digit numbers to end users.

The provider may pass on the 8- and 12-digit numbers to another provider. The provider who receives an 8- or 12-digit number passed on from another provider cannot pass the number on again to a third provider

- 3.2 This provision would prohibit the sub assignment of numbers to one level only. The reasons for this are said to be to “*increase transparency and improve the authorities' ability to conduct effective supervision*”. Twilio believes that subsequent sub-assignments should be allowed and can be performed in a way that still allows adequate transparency and allows for authorities to conduct effective supervision.
- 3.3 Allowing subsequent sub-assignments, in Twilio's view, helps ensure that numbering regulations do not become an artificial obstacle to innovation and competition. In particular, artificially limiting the number of subsequent sub-assignments limits new business models and use cases for numbers. An example of use cases that rely on subsequent sub-assignment is a growing list of companies that provide enterprise



applications that automate and accelerate organizations' operational response to public safety threats such as severe weather conditions, IT outages, terrorist and cyber attacks or other incidents such as product recalls or supply-chain interruptions. These companies services allow for their customers, which include some of the largest cities, airports and financial institutions in the world, to quickly and reliably aggregate and assess threat data, locate people at risk and allow responders to assist by automating the execution of predefined communications processes through different communication channels, including those using telephone numbers. These companies rely on subsequent sub-assignment from CPaaS Providers such as Twilio in order to deliver the critical communications to their customers using telephone numbers.

3.4 As an example of a possible solution to support subsequent sub-assignment beyond one level would be to require that:

- Sub-assignments taking place at second and beyond levels be notified to the national regulator by the party undertaking that further sub assignment;
- contracts between sub-assignees and a subsequent sub-assignee include requirements requiring compliance with conditions attached to the right to use numbers;
- annually reporting to Nkom on the subsigned telephone numbers and who are the sub-assignees/ the ultimate users responsible for the traffic generated to/from the numbers.

3.5 These requirements could eventually be phased out by the adoption of technological measures for number authentication (e.g., Stir/Shaken). Twilio would be happy to provide further information to the Ministry on Stir/Shaken if that were desired.