

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

Consultation title: Telephone Numbering (Safeguarding the future of numbers)

To (Ofcom contact): Andy Montaser

Name of respondent: Alan Clark

Representing (self or organisation/s): self

Address (if not received by email):

### CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing	<input type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?yes

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Name

Signed (if hard copy)

## Annex 10

# Consultation questions

### Questions from Sections 1-5

*Question 1 What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions?*

Good, but should go further, Any number being charged at more than the normal geographical rates (01x & 02x) or not included in "free minutes", should be subject to the same rules as premium rate numbers.

*Question 2 What do you think are consumers' key current views on numbering, how do you think those views will change, and how should Ofcom's current decisions take those changes into account?*

It is currently very difficult and sometimes impossible to know what you are being charged for a non geographic call, this needs to be overcome.

If you were not told how much your petrol cost per litre until after you had filled the tank, you would complain.

*Question 3 What do you think are the main ways in which technological developments will change the focus of numbering policy decisions, and how should Ofcom's current decisions take these developments into account?*

More non-geographic numbers will be needed

Greed will fuel the need for higher cost services

*Question 4 Do you have any comments on Ofcom's assessment of the current challenges to the Numbering Plan, in terms of a) number availability, b) transparency, or c) consumer abuses?*

No

*Question 5 Do you agree that the extension of conservation measures is the best approach to take before the impact of NGNs eases the pressure on geographic number demand?*

Agree

*Question 6 Do you agree that the use of overlay codes is the best backstop approach in the event that extended conservation measures are not sufficient to meet demand for geographic numbers?*

If NGNs are charged at the same rate as geographics the take up will be swift enough to remove the pressure

If this fails then overlay codes would be the best backstop

*Question 7 Do you agree that Ofcom should continue to respect the geographic identity of numbers until consumer understanding of the impact of technology change evolves further, and what do you consider is the best way to develop that consumer understanding?*

Yes

How about using letter codes on the dials to indicate first three letters of surname or organisation name.

*Question 8 Do you agree with Ofcom's proposal to open a new '03' number range for non-geographic, non-revenue sharing services?*

Yes

*Question 9 How should the '03' range be structured, in terms of tariffs and services?*

*Single tariff, same as 01 and 02 numbers*

*Question 10 How should the '08' range be structured, in terms of tariffs and services?*

Should have minimum number of tariffs and all numbers above a certain tariff (1.5 times 01/02 rate say) should be subject to

*Question 11 Which broad approach should Ofcom take to structuring the '09' range, and if a re-structured '09' range is preferred how would you arrange the different types of '09' services (e.g., according to price per minute, price per call, inclusion of adult content)?*

*09xy*

*x<6 fixed charge services (not time dependent)*

*x>5 time charged services*

*y the greater the value the greater the cost*

*Question 12 Should any specific PRS service categories be identified or segregated in order that parents can block access by their children (e.g., sexually explicit content, gambling)? Is there merit in having a general 'adults only' classification, including a range of services to which access might be restricted on the grounds of content, or might consumers wish to apply different rules for different types of content?*

*09 numbers could have an underlying content code which is not part of the number. Consumers could bar the dialling of numbers that have certain content codes irrespective of the actual phone number*

*Question 13 Are there any practical means by which the Numbering Plan could provide improved mobile tariff transparency?*

Force network operators to make it clear to their customers what the charge will be for a particular code. This could be done automatically by, say, entering the first 5 digits and pressing the # key, the cost per minute could then be displayed on the screen and announced audibly.

*Question 14 Do you agree that personal numbers should have a tariff ceiling (or recorded message) to restore trust in those numbers? If so, what level, and should that ceiling include the cost of recorded messages?*

*No - but the use of them for anything other than personal numbers should be strictly prohibited.*

*Question 15 Do you agree with Ofcom's proposals to move personal numbers (with the same consumer protection provisions) to the '06' range and to pursue the direct allocation of numbers to end users as proposed at some point in the future?*

*Yes*

*Question 16 Do you have any comments on the use of the 05 number range?*

*No*

*Question 17 Do you agree that Ofcom's overall proposals for a future Numbering Plan are coherent and comprehensive, and do you have any comments on the timescales in which the changes should be implemented?*

*Agree*

*Question 18 Do you agree with the principle of using consumer protection tests in numbering in order to limit consumer abuses, as long as the relevant legal tests are met? Do you have any suggestions for what tests would be appropriate or any conditions that should be met to pass such tests?*

*Also, anyone abusing numbers should be prosecuted under the appropriate law - "obtaining money through the use of false pretences" for example*

*Question 19 Do you support the proposal to extend the tariffing provisions of the Numbering Plan so that they apply to customers of all providers on all types of network?*

*Yes*

*Question 20 How do you think the new Numbering Plan could be effectively communicated to consumers?*

*TV advertising and programs  
Website*

*Question 21 What are your views on Ofcom's analysis and the different options for number charging?*

*No Comment*

*Question 22 Which, if any, numbers might appropriately be allocated using a value-based charge?*

*No Comment*

*Question 23 Do you have any other comments on Ofcom's proposals for numbering as discussed in Section 5, or any other suggestions for how Ofcom might revise the current Numbering Plan or its administration?*

No Comment

### **Detailed questions from Annexes 1-5**

*Question 24 What do you think of Ofcom's proposed general approach to managing geographic numbers?*

Agree

*Question 25 Do you have detailed evidence or suggestions on the variables likely to influence demand for geographic numbers, how those variables will change over time, and how Ofcom should develop a demand model?*

No Comment

*Question 26 Do you agree with the specific proposal for how to extend conservation measures, including the extension to areas with a number shortage predicted in the next five (rather than two) years?*

Agree

*Question 27 Do you consider there to be any upper limit, in terms of technical feasibility, on the number of areas in which conservation measures could be used?*

No Comment

*Question 28 Do you agree with Ofcom's assessment of the impact of conservation measures on stakeholders?*

No Comment

*Question 29 Do you agree that Ofcom should pursue these additional ways to improve number utilisation and, if we do, how would stakeholders be impacted and what practical issues are involved?*

No Comment

*Question 30 What are your views on overlay codes, and Ofcom's assessment of them, as a fallback option to increase number supply? What should be the maximum number of areas where overlay codes are introduced?*

*They are the best backstop in the short term*

*Question 31 What are your views on closing the scheme, and Ofcom's assessment of it, as a fallback option to increase number supply?*

*I believe it will be 30 years or more before geographic numbers can be phased out*

*Question 32 What are your views on wide area codes, and Ofcom's assessment of them, as a fallback option to increase number supply?*

I believe this will cause major changes to existing numbers and will be not acceptable

*Question 33 Might wide area codes be appropriate in regions with a strong identity and, if so, which specific regions are suitable for wide area codes?*

*No Comment*

*Question 34 Do you agree with Ofcom's assessment of the problems with current 08 and 09 in terms of information clarity and consumer perceptions?*

*Agree*

*Question 35 Which of these options for current 08 services do you think is best in terms of a) increasing consumer transparency and b) minimising the costs of re-structuring the 08 range?*

*No Comment*

*Question 36 How might early migration to the '03' range be encouraged?*

*No Comment*

*Question 37 Is it more important to indicate price per minute or price per call, and does this vary for different types of PRS service? What granularity of PRS tariff information should be given to consumers by the Numbering Plan?*

*Both - see my answer to question 11*

*Question 38 Should there be any PRS number ranges with no tariff ceiling?*

*Only in exceptional circumstances*

*Question 39 What is the typical turnover of 09 numbers, and what does this mean for migration timescales to a new 09 Plan? How could Ofcom structure the 09 range or take other steps to promote voluntary migration of 09 services?*

*No Comment*

*Question 40 Do you agree that that part of the 07 range which is currently unused (071-075) should be reserved for mobile services, with the aim of establishing 07 as a mobile 'brand'?*

*Agree*

*Question 41 Should Ofcom reserve specific sub-ranges within the 071-075 range for new mobile multimedia services, in the interests of promoting consumer awareness and tariff transparency, and if so how?*

*No Comment*

*Question 42 Do you support the use of 100,000-number blocks in allocating mobile numbers to new mobile voice providers?*

*No Comment*

*Question 43 Based on the above analysis, if Ofcom were to introduce a charge ceiling on calls to 070 numbers, which of the following levels should be adopted; i) 10 ppm ii) 15 ppm iii) 20 ppm iv) something else ?*

*No Comment*

*Question 44 Would a requirement to make tariff information clearly available to purchasers of personal numbering services at the point of sale, either in addition to, or instead of a call ceiling, be an effective means of providing tariff transparency on personal numbers?*

*No Comment*

*Question 45 If a new sub-range is made available for personal numbering services, how long should the current '070' sub-range remain available for existing providers, in order to minimise migration costs?*

*No Comment*

*Question 46 What issues do you think would need to be resolved before Ofcom makes individual numbers available for direct allocation to end users?*

*No Comment*

*Question 47 What do you consider to be the main strengths and weaknesses of the current rules-based system of UK number allocation?*

*No Comment*

*Question 48 Do you agree with these principles for number charging?*

*Agree*

*Question 49 What are your views on Ofcom's assessment of the issues to be considered in setting and reviewing number charges? For example, should other issues be considered in developing charging proposals?*

*No Comment*

*Question 50 Do you agree that charging for numbers could disincentivise economically inefficient behaviour, and incentivise economically efficient utilisation?*

*Agree*

*Question 51 What internal changes would communications providers have to make, and at what cost, to support charging for numbers? Would these changes be preferable to earlier and more widespread use of conservation measures and (limited) changes to increase geographic number supply?*

*Question 52 How might existing number allocation rules be reduced if charging for numbers was introduced?*

*Question 53 What are your views on this illustrative charging mechanism, and would you suggest any changes or alternatives to it?*

*Question 54 How would charging for number blocks affect consumers?*

*Question 55 What impact do you think charging for numbers would have on sub-allocation? Should Ofcom encourage or facilitate sub-allocation and, if charging were introduced, would changes be needed to the process of sub-allocation to facilitate trading?*

*Question 56 Which types of consumer abuse do you think Ofcom should particularly attempt to address through its numbering policy decisions?*

*Abuses of 0870 type services and of course the widespread abuse of PRS*

*Question 57 Which number ranges and types of originating communications provider do you think should be covered by an extension of the Numbering Plan's tariffing provisions? What practical issues are involved, and how would this vary according to the number ranges and service providers involved?*

*Question 58 What do you think of the potential conditions proposed by Ofcom for inclusion in a consumer protection test for number allocation, including the proposals that numbers should not be provided to anyone with a particular track record of persistent and/or serious consumer abuse?*

*Question 59 Are there any other circumstances in which it may be appropriate for Ofcom to refuse number allocations?*

*Question 60 Would you support the use of a consumer protection test as a basis for withdrawing number allocations? What kind of considerations should Ofcom apply in any such test, and what would be the practical issues involved in applying such a test?*

*Question 61 What consumer abuses do you think might occur in the future, and what steps might Ofcom take now in its numbering policy in order to reduce the potential for such abuses?*