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

Re the last principle: any exposure of consumers to abuse is unacceptable. The principle should be expanded to include eliminating exposure to such abuse when discovered.

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?*

The growth of shopping (or service access) by phone or Internet and home delivery perhaps makes geographic location seem less important – until something goes wrong. Then the availability of a local branch can be important. This certainly influences my views on companies I select to deal with. I suppose this sort of thing is really a trading matter but the Numbering Plan needs to provide means to allow companies to indicate their geographic location through their dialling code if they wish to.

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?*

To most consumers the technology underpinning their calls will be of little interest. Collections of new acronyms will simply confuse. In the medium term most consumers will expect to continue to access the telephone network as they always have done – using a number.

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?*

One can understand companies continuing to use the terms "local rate" and "national rate" despite the recommendation that such use should be avoided. Basically this simply demonstrates a lack of transparency is regarded as an asset. Transparency therefore needs to be enforced by requiring companies to quote maximum charges (in pence per minute) through any fixed-line communications provider (not just BT). The terms "local rate" and "national rate" are in any case obsolete in the modern telecommunications environment and usage of the terms should be prohibited.

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?*

Yes.

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?*

I have considerable reservations about this. I pity those unfortunate enough to have a phone number the same as that of a major receiver of calls on the other overlay code (referred to as a "mirror number" later in this answer). Misdirected calls will be the bane of their lives. I do not think minimum problems with 0203 in London can be cited as typical; (I assume) callers there are used to dialling 7xx- or 8xx- for "same area" calls so 3xx- was just a different number range

Perhaps the solution is to embargo mirror numbers for existing major receivers on the other overlay code and allocate numbers for new major receivers on a neighbouring code where capacity is not a

problem. As a final backstop be prepared to offer a new number and substantial compensation to anyone affected by incorrectly dialled "mirror number" calls, say £1000.

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. Short booklets inserted in phonebooks are a possibility but for many people the technology is immaterial – so they have no inclination to try to understand it. Working through children over a generation may be the only realistic solution.

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?*

The cost of a 03 call must be no more than that for a 01/02 call at the same time, through the same telecommunications service provider and with any applicable call plan. I have previously indicated that I believe the terms "local rate" and "national rate" are meaningless and should be prohibited – this must apply in pricing tables also. A free warning message should be required if a 03 call will cost more than a call dialled without a prefix (the option for consumers to turn this off could be attractive).

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

Apart from 080 free numbers any 08x number should be understood to include revenue share. This would provide an incentive for businesses (and public bodies) not wishing to be seen as profiting from calls to migrate to the 03 range. The maximum revenue share should be declared as 2ppm on 5ppm calls and 7ppm on 10ppm calls.

In my view Option 3(iii) is the best suggestion but the tariff variations illustrated in Figure 5.3 can hardly be described as easily understood. The main problem to me seems to be retaining the "local rate" and "national rate" nomenclature. Also what does "linked to [local/national] rate" mean, "… but more expensive than"? This is not an easy-to-remember description. Using <5ppm and <10ppm would be more easily understood and eliminate the need for a description different from that on the previous line.

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)?*

I find the pricing scheme presently existing (if there is one) for 09x numbers a complete mystery. Having to read (often very) small print before using such numbers is a nuisance. Restructuring the range into price bands is attractive, including a band for fixed-price calls. It should be made compulsory to give the total cost of a typical call as well as price per minute when a PRS number is publicised.

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?

Many consumers may be relaxed about a 09 call to a registered charity. The ability to block calls to specific content would be useful, but complex blocking options will simply confuse.

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

A maximum charge rate for fixed-line to mobile could be defined (and ditto for the reverse). Free messages could be required where PRS costs occur on top of the mobile charge with the option for consumers to opt out of receiving such messages.

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?*

I regard personal numbers as being for the convenience of the called party. As such the cost of a call to them should be the same as for a (new style) 03 number. If costs charged by communications providers are more than that the excess should be charged to the called party.

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. My answer to Q14 applies here also.

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

Keeping this range for what might be termed experimental (low usage) purposes is attractive. However it must not be allowed to become a new home for scams.

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?*

The overall plan seems reasonable but efforts should be made to speed up implementation.

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?*

Yes. The tests listed in the consultation document seem reasonably comprehensive.

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, most definitely. Lack of transparency of overall costs is of concern when comparing providers.

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

Using the inside covers of phone books is a realistic approach for providing reference information. Media advertisements are suitable for launching the Plan.

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

Charging for number allocation and a retention fee seems reasonable as an incentive to encourage efficient use of numbers and number conservation.

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

An annual fee for 09 numbers and 10ppm 08 numbers is suggested.

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?*

The one thing I feel most strongly about is prohibiting "local rate" and "national rate" call terminology.