

Cover sheet for response to an Ofcom consultation

Basic Details

Consultation title: Telephone Numbering - Safeguarding the future of numbers

To (Ofcom contact): Nic Green

Title MR

Forename GARRY

Surname CURRIER

Name and title under which you would like this response to appear*

CURRIER, G

Representing (self or organisations) Self

Email Address

Confidentiality

What do you want Ofcom to keep confidential ?

Nothing

Whole Response

Name-Contact details/job title

Keep name confidential

Keep contact details confidential YES

Keep job title confidential

Part of the response

Thank you for the opportunity of responding to the Numbering Review Consultation. I wish to focus my response on how Ofcom's proposal will address the problems of non-geographic numbers. Ofcom received a strong public response against the use of non-geographic numbers as part of the NTS – The Way Forward Consultation. I urge Ofcom to use this earlier response to inform its conclusions on the numbering review.

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 ?

I support Ofcom's intention to create a numbering system that is more systematic, more accessible and more easily understood, and on the surface your proposals seem to achieve this. However, on further inspection, I think many of the old problems particularly concerning NGNs will unfortunately continue.

In short I do not believe your proposals are not sufficiently transparent, do not provide sufficient protection for the consumer, and your proposals for the '08' range are inadequate and will allow many of the existing problems to continue.

Given that Ofcom has been consulting on these and related issues for some time now, I believe prompt timescales should be followed with implementation within 12 months! (i.e. summer 2007 at the latest) Interested parties will already be well aware that change is in the pipeline so will have had adequate time to prepare.

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?

As Ofcom identify there is massive public confusion regarding numbering, particularly with the misleading and overpriced '08' number ranges but surely Ofcom is guilty of allowing this situation to arise in the first place.

People simply don't know what they're being charged, the vast numbers of tariffs are confusing, and the way they're advertised is often very misleading.

As Ofcom admits that despite its efforts to re-define the terms local/national rate, these terms are still misleadingly being used by businesses. Equally confusingly I see that Ofcom have peppered their own consultation document with these terms 'local' and 'national'! Surely the best way for Ofcom to now address this problem is to once and for all enforce that there is no longer any distinction between local and national calls. This is already the reality for many people, both for those on a BT Together Option and for those with an unlimited inclusive call plan e.g. AOL Talk.

In addition, whereas the cost of geographic calls has come down in previous years, the cost of non-geographical calls has not and so is now comparatively

high. This is simply anti-competitive and, in this area alone, Ofcom is clearly failing in its duty to protect the interests of the consumer!!!

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

Ofcom states that it intends to simply the '08' and '09' ranges. It would be a simplification to re-classify the '08' range as PREMIUM RATE. People understand that 'premium rate' means higher cost phone calls and this is exactly what '08' numbers are. Certainly this label carries more meaning than the vague 'chargeable services' that is proposed. These two ranges are close numerically and it would be easy to understand that '08' is lower cost premium rate and '09' higher cost premium rate. It would of course follow that the re-classified '08' would receive the same regulation and safeguards as the '09' range.

The only alternative to honest labelling of the '08' range would be to force users of these numbers to the newly structured '09' range but I realise Ofcom is keen to avoid number changes if possible.

Of equal importance, I believe that Ofcom should force much greater transparency on the '08' range in particular. All '08' numbers that are charged at a higher rate than geographic numbers MUST include a call cost announcement. I realise that it might be complicated with different phone companies charging different amounts but the only solution is to state the MAXIMUM charge from both a landline and from a mobile too. This would address the misleading and deceitful nature of many NGNs and secondly would over-time educate the public as to their actual cost, not their perceived cost. The consumer would then have an informed choice over whether to proceed with the call or not.

Two-digit banding of the '08' range with "the higher the number, the higher the price" does make logical sense. This clarity, however, would be clouded by allowing the current 0870/0871/0845/0844 to continue. Ofcom's unwillingness to force companies to change their numbers will diminish the achievements of a revised numbering plan and ultimately mean it will fail to meet its aims of being more systematic, more accessible and more easily understood.

On this point, I'm sure Ofcom is aware that some of these companies are already voluntarily changing from 0870 to 0871 to avoid losing out when the cost of 0870 is reduced! Migration costs certainly don't appear to be a problem here! Surely this also highlights that as admirable as Ofcom's proposal is to reduce the cost of 0870 calls, this piecemeal approach is easily side-stepped by organisations and therefore the proposal is doomed to fail. Only unless Ofcom is prepared to deal with the '08' number range problems in their totality and with some compulsion, will a satisfactory resolution be reached.

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

I strongly support the idea of the proposed '03' range which has the potential to provide many benefits for the consumer by dealing with the problems of NGNs. This is, however, completely dependent of whether or not Ofcom is prepared to properly and fully reform the '08' range. (see question 8)

I believe Ofcom's proposals for the '08' range would create a massive disincentive for those considering migration to an '03' number. (see Q36)

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

To avoid confusion and a repeat of the problems concerning NGNs, I strongly believe that all '03' numbers should be charged at the same rate as geographic calls and all '03' numbers should be included in inclusive call packages. Otherwise, if we have the situation where some '03s' are the same but some '03's aren't then we have the '08' mess all over again and Ofcom will not be achieving its aims of being systematic, accessible and easily understood.

Having a uniform pricing tariff for the new '03' range would allow Ofcom to designate each sub-range by service ; i.e. as suggested by Ofcom, 030 for essential public services.

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

This will be a key test of Ofcom and I believe it is dependent on Ofcom tackling head-on the problems of the '08' range (see question 10). If Ofcom fails to address these problems then '03' migration will be slow, as there will be very little incentive.

If Ofcom re-classifies '08' as premium rate, ensures that cost call announcements are made and forces existing 0870/0871/0845/0844 to migrate, then this provides a starting platform for '03'. Helping the public recognise that the '08' range is a lower cost premium rate and realising the price per minute when a call is made, could help create a demand for the '03' number range. Furthermore a forced migration from certain NGNs to the '03' would probably give the new range the kick-start that many of the public and Ofcom desire. This would certainly mean that Ofcom would then not be alone in publicising the new number range !!

To further help migration, I believe the '03' band should be as attractive to organisations as possible. '03' numbers should cost organisations no more and have the equivalent features of the existing '0845' number range. Otherwise, why would an organisation adopt an '03' over an '0845' or equivalent number ?

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 think the '09' range should also include call cost announcements and should be largely banded by price (the higher the band, the higher the price) like the '08' range, with the exception of adult content which should have its own band (e.g. 099) so that it can be easily blocked.

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 strongly believe that overlay codes should be avoided. Having multiple numbers for the same area would be confusing and surely runs counter to Ofcom's plans to simplify the numbering scheme. Measures must be taken to better utilise the capacity of existing number ranges that arguably haven't been well managed.

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?

Yes, personal number should have a tariff ceiling, which should include a call cost announcement/recorded messages that are free to the caller who then has the choice whether or not to proceed with the call.

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, certainly. Having tariff ceilings across networks, both landlines and mobiles, will in itself make matters easier to understand.

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

It goes without saying, of course, that the simpler the numbering plan, the easier it will be to communicate. Your proposals to reform the '08' range whilst keeping the existing 0870/0871/0845/0844 immediately creates a confusion – “these are our nice new logical sub-ranges but do try to ignore the fact that we've kept old illogical numbers even though they don't fit the new scheme”. Surely there is a price to be paid by not forcing migration from the old and much disliked NGNs and the first one is confusion over Ofcom's new number plan!

Treating neighbour number ranges the same or very similar aids understanding; i.e. '01', '02' and now '03' – all charged at standard geographic

rates and included in inclusive call plans; '08' and '09' - all premium rate numbers and charged at rates higher than geographic rates, '08' as lower cost premium rate and '09' as higher cost premium rate.

A very brief leaflet or poster should tell people quickly and easily the main points of a revised number plan. There should be no need for the average consumer to read a 30+ page booklet or always examine the small print to avoid being ripped off, as is currently the case.

The action taken by Ofcom as a result of the NTS – The Way Forward Consultation is already proving to be ineffective with companies already migrating from 0870 to 0871 numbers. This NTS consultation will regrettably be seen a missed opportunity.

I hope Ofcom can see the shortcomings of such action even though their intentions were good. I'd encourage Ofcom neither to forget these shortcomings nor the unprecedented public response against the use of 0870 and similar numbers. I therefore urge Ofcom to use this renumbering consultation to make amends for this and to once and for all address the misleading, deceitful and overpriced aspects of NGNs as part of producing a truly systematic, accessible and easily understood numbering plan.

Finally I hope Ofcom can surprise those large numbers of the general public who have become cynical of Ofcom. Regrettably it has become incredibly difficult not to conclude that Ofcom sides very heavily with the interests of business rather than the consumer. It seems Ofcom have presided over a excessively complicated telephone numbering system which simultaneously confuses the public on the one hand but on the other provides numerous opportunities for telecom companies to profit from this very confusion. Ofcom now has the opportunity as part of the numbering consultation to rebut these criticisms. I believe that if it fails to meet this challenge, then it is not only the UK Telephone Numbering Plan at stake but also the integrity of Ofcom itself.