

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: Mr Dave Cresswell

Representing (self or organisation/s):

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"/>
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Response only

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?

Excellent principals to avoid charging confusion all round

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?

Consumers very confused especially about the personal numbering 070 series

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?

Voice over IP will changenature of calling as the internet and calls routing becomes one and the same in a lot of cases

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?

I think that there is still consumer abuse on the 070 and 0871 range of numbering especially when it comes to callng these ranges from mobile phones as the nubmer hodlers always say things like "only 10p a min" without any reference to calls from mobiles

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?

Yes

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?

Most definetely as the geographic coding forms a security backstop incoming calls

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

Yes this would make perfect sense

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

yes I think so

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

Quite clear on the breakdown of tariffs with clear gaps in the sequencing so customers can see at a glance the cost of calls

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)?*

price per call and a clear range for adult content. And if possible ensure telephone providers provide optin service only from bill payer for these range

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?*

I agree fully to segregation in this question

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

Perhaps a small plasticised card from the customers existing telephone/mobile provider showing number range for each type tariff.

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 agree that there should be a tariff ceiling and the recorded message should not be charged for. Am sure technology exists through routing to allow non charging of a short recording before charging begins

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?*

I believe an 06 range for personal numbers would make it quite clear that it is a personal service and also I dont see why consumers cannot choose (with an initial reasonable setup fee if necessary) a personal number

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

none at present

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?*

yes I agree but feel that long term planning needs to be made as in the past 5 years there as been many changes with the numbering system

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

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?*

Via telecoms operators, mobile phone companies, internet and usual media sources

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

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

Quite well thought out

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

Detailed questions from Annexes 1-5

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

well thought out and it makes sense in what has been suggested

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?*

none

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?*

no comment

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?*

yes

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?*

I think stakeholders need to keep in line with efficient use of numbers, especially mobile ones

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?*

no comment

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

none

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

wide areas codes can make sense for some of the bigger organisations

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?*

The main met areas like London, manachers, Glasgow, Birmingham etc

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?*

Yes fully agree too much confusion and at the same time am sure gives telecoms organisations headaches with billing quieries

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?*

minimise cost of restructuring for teh freephone numbers and the short ones like childline need to be preserved

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

selling the benefits early on

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?

Price per minute everyone understands

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

None at all

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?

dont know

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'?

07 range should all be mobile including a section for mobile services like video download from 3g plus whatever may arrive in the near future

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?

see question 40 above

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

Seems a large block would suggest a lot less than that and then operators can justify furtehr blocks as there range is used up

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 ?

not sure

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?

Yes I would think so but its not the purchaser who pays the msot for incoming calls as far as I know its the person ringing them

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 new 070 number issue once a new range is made available

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

A safety net so that end users are genuine UK residents and a far charge for being able to haev these nubmers

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

I have no experience of otehr areas of world so cannot comment

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

Yes to a certain extend

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?

maybe

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?

unable to comment on thsi as not a telecom provider

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

no comment

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

no ofcoms suggestinos seem fine

Question 54 How would charging for number blocks affect consumers?

not sure

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?

no comment

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

high call charges for personal numbrersand the 0871 type range. Enforce operators that use premium rate numbers to show true cost of calls and an average cost from mobile phones

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?

All high call tarrifs than local, regional or national. including those that charge a minimum call charge

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?

no comment

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

refuse or recide numbers from organisations that break ofcoms rules or have shown not to be a responsible operator especially in teh area of complaint procedures

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?

not sure on this one as I feel OFcom are the main experts especially in legislation

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?

mis advertisment of calling costs, organisatinos usign a lower rate number then asknig you to redial a high cost nubmer to use their services.