

Response From Mr David Dunlop

Question 1:What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions? : I passionately agree with OFCOM's apparent decision to force telephone operators to charge no more for 0870 numbers than for geographical numbers.It wouldn't surprise me that companies found this an easier,softer way to make money rather than putting the price onto their products and/or services

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? : They are probably fed up with changes in numbering but I strongly believe this could be overcome if OFCOM made it very clear why more changes are required such as the growth in mobile phone numbers(people often have more than one mobile phone now),non geographical numbers,etc.

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? : I believe that such decisions will have to be continually reviewed as technology develops and improves.However,it is important for OFCOM to build a measure of reserve into any numbering changes so that it doesn't have to make changes every time a new piece of technology hits the market.

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? : The challenges are probably expected but,as suggested above, education of the general public is probably the best way forward

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?:

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?:

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.Possibly one way of doing this is to "educate" the public via TV news channels,radio news channels and consumer programmes.

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 ?: EXACTLY the same as for geographical numbers.

Question 10:How should the '08' range be structured, in terms of tariffs and services?: EXACTLY the same as for geographical numbers.

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)?: The digits immediately after 09 should easily reflect the type and cost of the call.eg.adult,technical,legal help.25p,50p,75p per minute,etc.

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?: YES

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

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

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?:

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

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?: Possibly

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?:

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 because otherwise there would be total confusion as is the now the case

Question 20:How do you think the new Numbering Plan could be effectively communicated to consumers?: TV news,radio news,consumer programmes.

Question 21:What are your views on Ofcom's analysis and the different options for number charging ?: I strongly agree with aligning the charges for 0870 numbers alongside those for geographical numbers.

Question 22:Which, if any, numbers might appropriately be allocated using a value-based charge ?: Only those beginning 09 with the consumer protection laws that come with it.

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 ?: There is probably no need to waste money on advertising on TV,radio,newspapers,etc.I'm sure if any changes become official the media companies will be desperate for OFCOM spokespersons to discuss these changes on air.

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

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?:

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?:

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 ?:

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

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 ?:

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?:

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

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

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?:

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 absolutely!

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 restructuring the 08 range ?: Exactly realigning the costs of 0870 numbers with those for geographical numbers and telling all the companies to add their lost revenues onto their products and/or services.Why should OFCOM be made to pay for CHANGING the costs of restructuring the 0870 range? Let the companies who have exploited these numbers in the past now pay these costs!

Question 36:How might early migration to the 0300 range be encouraged?: Education and lower access pricing

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?: No.both are actually quite important.

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

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 ?:

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??: Yes-particularly with the anticipated growth in data card use with laptop computers.ie.mobile internet-internet on the move.

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 ?: Yes but unfortunately I don't know how

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

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: The charging should be the exact same as for calls to geographical numbers.Otherwise I believe we will end up with another 0870 type of rip-off mess.In addition,OFCOM would then probably have to revisit this problem with yet another public consultation.This problem needs "nipped in the bud" NOW before people start using personal numbers as a means of generating extra revenue for their own pockets

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 because the purchaser would have no incentive to highlight the costs to users contacting him/her

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 ?: As short a time as possible as I see it as another rip-off just like the 0870 mess.

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

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

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

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 ?:

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

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 suballocation to facilitate trading?:

Question 56:Which types of consumer abuse do you think Ofcom should particularly attempt to address through its numbering policy decisions?: As above.The pricing should be made uniform across the different number ranges with the exception of numbers beginning 09 which come under strict ICSTIS rules.This would ensure companies' call centres,and,individuals would use non-geographical and personal numbers respectively for the correct reasons.ie the former so that a company could change the call centre it uses without having to advertise a new contact

telephone number to its customers. The latter so that callers can easily contact an individual without paying a premium to the recipient for the privilege.

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?: This latter inclusion is good but the public would need to know what realistic action OFCOM could take in such instances and the extent to which these proposals would de-incentivise potential abusers in the first place

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?: Companies and individuals making easy money from individuals contacting them unless calling costs become uniform across the range with the exception of 09 numbers

Additional Comments: