



Representing the Communications Services Industry

FEDERATION OF COMMUNICATION SERVICES

1981 **25 Years** 2006

19th September 2006

Neil Nasralla
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Office of Communications
Riverside House
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Dear Neil

Implementing decisions from Ofcom's numbering review

This response has been produced by the Numbering Group within the Federation of Communication Services, FCS, the communications services industry trade association. A full list of FCS members may be found on the website www.fcs.org.uk.

The Numbering Group was set up in April 2006 expressly in response to Ofcom's Numbering Review to provide a collective view from numbering providers, their resellers and others associated with the telephony market. Input has also been received from FCS members delivering WLR, CPS and VoIP services. The Group objectives are to ensure that there is a fair open and competitive environment and to promote best practice and standards for number service providers.

We welcome the opportunity respond to this further consultation on the numbering review and would like to take this opportunity to restate our agreement with many of the decisions contained in the statement and our support for the underlying principles of providing greater transparency, improved availability of numbers and better consumer protection. However we do have some concerns about inconsistencies between the decisions arrived at in this statement and other closely related recent consultations.

Our responses to each of the consultation questions are given below.

Q1 *Which of Ofcom's two options for a price ceiling for 070 numbers – above which a free pre-call tariff announcement would be required to inform the customer of the maximum price that could be charged - do you prefer, and why:*

- a) a standard price ceiling of 20p per minute or per call from all originating providers ; or*
- b) a customer-specific price ceiling of no more than the maximum that a customer would pay, on a per minute or per call basis, to call a customer on a mobile network from that*

The Federation of Communication Services Ltd

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originating provider?

In general, we do not believe that the case for imposing a price ceiling has been clearly demonstrated. However, of the options proposed by Ofcom, we favour a ceiling of 20p as we believe this will be easier for end-users to understand and will, therefore, support Ofcom's declared objective of improving transparency in pricing. It should be noted, however, that the setting of a vat inclusive price could lead to complications later if the vat rate is changed.

We do also have serious concerns that OCPs are not currently equipped to provide the price announcements required, which may lead to a disproportionate cost for many companies in developing such capabilities.

Q2 *Is the proposed implementation date of around February 2007 reasonable to implement either of the two price ceiling options? Will either of the price ceiling options be more complex or require more implementation time than the other?*

In light of our comments above on the ability of OCPs to provide price announcements, we feel that February 2007 may be too early a date for implementation of this measure.

Q3 *Do you agree with the proposed designation of 071 to 075 inclusive as mobile services, and the corresponding amendment to the application form to include 075?*

We agree with the allocation of these specific ranges for mobile use but we do have concerns about the promotion of the 07 range generally as a "mobile-only" brand.

Q4 *Do you have any comments on Ofcom's guidance on the categories of end user eligible for 0300 numbers? Can you suggest any other categories of public service and not-for profit bodies that should be included in the guidance?*

We do not have a problem with the principle of reserving this range for use by public service and not-for-profit bodies but feel that there may be difficulties in establishing which organisations fall into the definition if it is too prescriptive.

Q5 *Do you have any other comments on the specific changes that Ofcom is proposing on the Numbering Plan and application forms?*

As noted above, we believe there are clear inconsistencies between the conclusions arrived at by the numbering review and other closely linked consultations; for example those contained in the consultation on the regulation of VoIP services and the NTS statement.

Specifically we note that the NTS consultation closed before the proposals in the numbering review were made public; for example, proposals on the 03 range which may have had an impact on responses to the NTS consultation.

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