Question 1:What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions? : Many of your proposals are ideas you would LIKE to happen rather than insisting that they MUST be invoked. You suggest that market forces together with OFCOM sanctions will remove the abuse. So far market forces have not prevented abuse of the 087x system and experience has shown that when a scams is closed those running it just start up again under a different name and different nominal directors. Without criminal sanctions it will be impossible to restore user confidence.

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? : I can talk only for myself but my experience is that most people are unaware of the charges for non-geographical numbers, particularly when they are advertised as local or national charges. The actual charges bear no resemblence to actual local and national charges.

Unless OFCOM dertermine that changes must be made, BT will continue to expand its monopolistic use of these numbers.

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? : Most of the current problems are not technological but cultural. It is OFCOM's resposibility to change the culture.

It is impossible to anticipate how technology will change the use (and misuse) of the telephone system. Who could have foreseen the effects the internet and mobile phones would have.

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? : b) OFCOM admits that 087x numbers are mini premium rate and therefore should be given 09x numbers.

c) It is an abuse of the system for receivers of non premium-rate calls to receive part of the revenue unless they give a service that warrants it. This has the effect of the company allowing or even creating delays so as to increase revenue.

In the USA most sales calls are FREEPHONE whereas some sectors in the UK, such as travel and computers, are mainly 087x numbers. Why should customers be charged a telephone supplement for purchasing by telephone!!

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?: I do not have sufficient knowledge of the subject to make a useful comment.

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?: see Q5.

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? : The problem is not technological but cultural. It is the lethargy or ignorance of the general public that allows companies to profit from non-geographic numbers without giving suitable service. I do not have any objections to free internet service providers from using 0845 numbers to pay for the service and therefore this type of charging must still be possible but only for approved usage.

The public need educating as to the true cost of these calls but also non-geographic numbers must be either transferred to 03x or classed as premium rate with all that implies. To allow the present system to continue is a misuse of OFCOM's role.

Question 8:Do you agree with Ofcom?s proposal to open a new ?03? number range for non-geographic, non-revenue sharing services? : Yes - provided it is fully compatible with 01 and 02 numbers.

Question 9:How should the ?03? range be structured, in terms of tariffs and services ?: These numbers must be treated as geographical numers (01 and 02) in all respects including cost and access via all carriers. These numbers should also be available from abroad.

Question 10:How should the ?08? range be structured, in terms of tariffs and services?: 080x freephone.

084x where the receiver gives an approved service. Doctors surgeries should not be approved for higher rate calls.

087x should be removed from the system unless a special service is provided such as technical assistance.

BT's monopoly must be broken. This will reduce the pressure to convert to these 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)?: Due to the wide range of services provided by these numbers it is necessary to have a wide range of charging but these should be clear from the prefix.

Where 09 numbers are fraudulently dialled by internet viruses etc. the cost should not be borne by the innocent party but by the owner of the line.

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?: Not sure.

Question 13:Are there any practical means by which the Numbering Plan could provide improved mobile tariff transparency?: Don't know.

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? : Personal numbers should have a limit, probably comparable with that of mobile phones.

People receiving these or any other calls should not be charged, as is common in some hospitals.

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.

Question 16:Do you have any comments on the use of the 05 number range?: I have not had time to read the full proposals, only the summary, and therefore I am not in a position to comment.

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 have not had time to study them fully, but they appear to be an improvement but efforts must be made to minimise unintended consequences. This would require detailed consideration by panels on which consumer groups have as much representation as the carriers and providers.

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?: There are two types consumers and these are somtimes confused in the questions. One is the consumer of the carrier eg the provider which requests an 087x or 09x number from the carrier, the other is the member of the public who calls this number.

The public need to be protected from abuse by law. This would include the maximum time (including any messages and menus) between the call being accepted and connection to person or service required. Even at this stage there must not be unecessary delay.

How do you prevent an abuser who has been barred by OFCOM from reappling under a different name!

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?: The numbering plan should be simple and self evident. Then there would not be any need to make a special effort to communiate to the public.

If this is not the case OFCOM will have failed.

Question 21:What are your views on Ofcom?s analysis and the different options for number charging ?: Seeq Q16.

Question 22:Which, if any, numbers might appropriately be allocated using a value-based charge ?: See Q16.

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 ?: See Q16.

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

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?: Technology always allows systems to expand in unforseen directions eg the internet, cable television and mobile phones. It is impossible to anticipate whether demand will increase or decrease.

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?: It is a proposal which will overcome immediate shortages but is likely to result in multiple changes as we saw in London.

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?: See Q26

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.

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 ?: a) Essential

b) 08 numbers must be restructured (see Q10) and the cost should be borne by the existing users of these numbers as they have received a share of the revenue. They will kick and scream as usual but that must not deter OFCOM from taking the correct path.

Question 36:How might early migration to the ?03? range be encouraged?: It will require more than 'encouragement' to migrate away from the lucrative revenue-sharing scheme. It will require compulsion from OFCOM.

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?: I use 1899 even though it is not recognised by OFCOM because it is 'price per call' in the UK.

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??:

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 ?:

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: This question is incomplete.

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?: Information at the point of sale is useless because
a) the tarrif could change

b) it is the caller who pays not the purchaser.

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 ?:

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

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 ?: Experience has shown that some people will find a way to circumvent your good intentions for their own gain. This seem to be a system fraught with such possibilities.

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 ?: Any charges eventually falls on the consumer. Even if the money raised from these charges were to ploughed back the cost to the consumer wouyld still increase.

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?: It must not only tackle existing abuse but prevent future abuses made possible by system changes.

The main abuses involve artificial delays designed to create revenue.

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 ?: See Q18

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?: I have always been amazed at peoples ingenuity in overcoming 'foolproof' systems.

Additional Comments: From the summary and the questions I suspect that comsumer organizations have been underrepresented in the discussions.

087 numbers must be banned in favour of 03 numbers.