

The following are my general comments to the consultation.

My Overall Impression of Ofcom

My overall impression of Ofcom's activities in respect of its telecommunications function, is that it acts more like a trade association for the telecom industry, than to further the interests of the consumer citizen.

Ofcom produces consultation after consultation. The purpose of the consultations appears, not to elicit views and opinions from consumers, but to reinforce opinions already held by Ofcom. If a consultation does not produce the "correct response" then Ofcom produces another consultation. The consultations and accompanying consultations questions are framed to produce an 'Ofcom acceptable outcome'. A recent example is the consultation on NTS (non-geographical numbers) followed by a Consultation on Telephone Numbering (this consultation). Both consultations relating to widely overlapping topics. The first consultation resulted in an unprecedented massive response of well over 1000, and produced widespread criticism of the scams associated with the use of non-geographic telephone numbers (087x and 084x), the second consultation appears to be designed to produce a much smaller response, and was far too long with 61 consultation questions. The second consultation ignored the overwhelming views expressed in the first consultation.

Consultation documents put simple ideas in convoluted, complex and prolix ways.

Ofcom has failed time after time to protect the consumer and appears to support the telecom industry in the many scams and sharp practices, by its weak and indecisive regulation.

Comments About the Consultation.

This is yet another consultation relating to telephone numbering and although wider in scope than previous consultations, it again covers much the same ground. The previous consultation on NTL numbering had an unprecedented response (well over 1000), but as that consultation produced the "wrong conclusions", in being critical of Ofcom's failure to properly regulate revenue sharing in the "08" range (084x and 087x). Ofcom have resorted to the device of producing an over complex consultation document, which will deter most from responding. Ofcom generally ignore consultation responses.

The primary aim of a number plan should be to produce telephone number ranges that are readily recognised both in function and cost by the vast majority of callers. The proposals outlined by Ofcom fail in that aim. The function of "01", "02" and the proposed "03", appear clear, but time will tell. If "03" emerges as described (treated in all respects like the current 01/02 numbers and revenue sharing prohibited), that range should not present any problem to consumers. Removing "070" (so called personal numbers) from the rest of the mobile numbers is also to be welcomed.

The remainder of the proposals keep and perpetuate the current problems and make matters worse. The proposals keep the mix of revenue sharing numbers (087x and 084x) together with free-phone numbers. The current "08" range is a fertile ground for scams, deceits and half truths, practiced by telecom companies and organisations.

The only honest and transparent reform is to confine all revenue sharing and "above normal" tariff numbers to one single designated range. That range is the "09" range which can

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accommodate 1,000,000,000 number combinations. Prices in a reorganised and reformed "09" range could run from 1p to 150p/minute, so "low cost" revenue sharing numbers can be accommodated as well as more expensive numbers.

We should have a simple and transparent rule: If the number to be dialled (apart from mobiles) is revenue sharing and/or not included in the normal schemes and tariffs then it must be placed in an appropriate sub range of "09". The only reason for not adopting that simple coherent solution is to aid organisations and telecom providers that wish to make hidden charges to consumers.

My Response in a Nut Shell.

"01 & 02" This range should be left as it is.

"03" It is proposed that this range should be non-geographic and non revenue sharing. This is fine provided 03 is treated in the same way as 01/02 as regards inclusion in various call schemes. This range should only have one set of tariffs, the idea that "03" could be split into "national" and "local call" rate is nonsense and flies in the face of the reality of call costing in the 01/02 range, which to all intents and purposes has one universal rate.

"04" Reserved

"05" No change

"06" This range should be reserved. All revenue sharing should be confined to a suitable sub-range of "09". The proposal to remove the 070 (personal numbers) range is fine, but it should not be moved to the "06" range. This will provide another fertile ground for various scams. "070" should be moved to an appropriate sub-range in "09". For example, "097" can hold over 99 million numbers.

"07" The proposal to confine this range to mobile telephones only, is to be welcomed.

"08" Should be free-phone only.

084x and 087x should migrate to "09" or "03", depending on price structure required. Keeping parts of the 08 range for revenue sharing would be to continue and make worse the scope for scams and deceitful practices. I can not see any logical objection to the number plan being transparent - all land line numbers that cost more than normal or are excluded from the various call packages should be placed in an appropriate sub-class of "09".

"09" Any land-line number which cost more than the normal rate and/or is excluded from a consumers call options at 0p/min, should be placed into this range. With charges ranging from 1p/min to 150p/min. So that so called "low cost" revenue sharing numbers can be accommodated into the "09" range. A three second, pre announcement as to cost, should be made.

The 11 digit "09" class can be split into 090, 091, 092, 093, 094, 095, 096, 097, 098 and 099 sub-classes, each sub-class having 99,999,900 different numbers (allowing for, say, 100 unusable combinations). The total capacity of the full "09" range would be up to 1,000,000,000. number combinations.

For example:

090 all calls less than the normal rate, but not included in "free" call packages - internet dialup and "low cost" revenue sharing. (say from 1p to 2p/min)

091 charges above the normal call rate (say from 3p to 10p/min)

092 charges above the normal call rate (say 20p/min)

093 charges above the normal call rate (say 30p/min)

094 charges above the normal call rate (say 40p/min)

095 charges above the normal call rate (say 50p/min to 150p/min)
096 charges above the normal call rate (reserved)
097 for so called “personal numbers” (now on 070). (with price cap of 10p/min)
098 fixed charge per call.
099 for adult lines (with a 150p/min price cap)

Consultation Questions

Question 1:

What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions?

Ofcom has failed in its strategic principals not to expose consumers to abuse and has failed to follow, amongst others, Article 10 of the EU Directive, by continuing with the mixture of 08 numbers being both free (0800) and revenue sharing (084x and 087x) and risks, as a public body, litigation in the UK courts for failing to properly implement this directive.

Ofcom’s own documents acknowledge that the present system lacks transparency and consumer confidence, but its proposals do not draw a clear distinction between free numbers and revenue sharing numbers or “normal tariff” numbers (01 and 02) and revenue sharing non-geographical numbers (087x, 084x) The proposal to extend the 08 range of revenue sharing numbers is perplexing.

All revenue sharing numbers should be placed into the reorganised and designated revenue sharing “09” range, with tariffs of 1p to 150p per minute.

Provided the proposed new class of “03” of non-geographical numbers is to be treated in all respects in the same manner as “normal tariff numbers” (01 and 02) then this proposal is reasonable.

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?

A primary aim of numbering should be to make the nature and cost of a particular number obvious and transparent. Transparency is not achieved by continuing with the present clandestine revenue sharing numbers 087x, 084x and 070 (so called personal numbers).

All revenue sharing numbers should be placed into a suitable sub-range of the “09” class with tariffs of 1p to 150p /min. (each sub-range – 091 – 092 – 093 - etc. can hold over 99 million numbers).

Consumers views are ignored at the expense of maintaining clandestine scams. Consumers have expressed a clear view in Ofcom’s previous consultation on NTS numbers.

Question 3:

What do you think are the main ways in which technological developments will change the

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focus of numbering policy decisions, and how should Ofcom's current decisions take these developments into account?

Irrespective of technological developments customers should know, above all, the nature and cost of dialling a particular number.

01, 02 and the proposed 03 should all be priced in the same way.

07 should be reserved for mobile numbers only (070 moved to 09..)

08 should be free numbers.

09 numbers should contain all numbers that are revenue sharing or outside the usual tariff of normal numbers 01 and 02. 09 would have a price range of 1p to 150p per min.

The ranges 04, 05 and 06 should be reserved for future technological developments.

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?

Ofcom acknowledges that consumers do not find the present 08 range transparent, but appear to do little about the problem. The proposals to extend the 08 range of revenue sharing numbers is inexplicable. All revenue sharing numbers and numbers outside the normal tariff should be placed into a revamped "09" range with prices between 1p and 150p/min and with a pre announcement as to call cost.

Abuses will continue and be further encouraged by the continuing use of the 08 range as both free-phone and revenue sharing.

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, but the large amount of dormant numbers should be used first.

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?

Geographical identity should be preserved.

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 they are treated in all respects in the same way as 01 and 02 numbers and are included in the various call packages.

Question 9:

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

03 should be treated in all respects in the same way as 01 and 02 numbers. 03 should have one tariff, the discussion, in the proposals, about "local rate" and "national rate" is plainly absurd and would provide another avenue for scams.

If 03 is treated in all respect like 01 and 02, subdivision, by tariff, is not necessary and would be highly undesirable.

Question 10:

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

08 should only contain free-phone numbers. Organisations who do not wish to put consumers to extra expense should migrate to the proposed "03" range of non-geographical numbers. Organisations wishing to participate in revenue sharing, however small, should change to a suitable sub range in the "09" class, with prices from 1p to 150p/min. The above is honest and transparent. Clandestine revenue sharing in the 08 range should be abolished.

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)?

All revenue sharing numbers or numbers outside the normal tariff (now 01 and 02) should be placed into a suitable sub range. Prices would increase as the sub range increased.

For example:

- 090 all calls **at less than the normal rate**, but not included in "free" call packages - eg internet dial up and lower cost revenue sharing. (1p and 2p/min)
- 091 charges above the normal call rate (say 3p to 10p/min)
- 092 charges above the normal call rate (say up to 20p/min)
- 093 charges above the normal call rate (say up to 30p/min)
- 094 charges above the normal call rate (say up to 40p/min)
- 095 charges above the normal call rate (say 50p/min to 150p/min)
- 096 charges above the normal call rate (reserved)
- 097 for so called "personal numbers" (now on 070). (10p/min cap)
- 098 fixed charge per call.
- 099 for adult lines (sex – gambling - etc).

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Note: each sub-class can hold over 99 million numbers each. Over 999 million in total.

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?

See answer to Q11. The structure would allow any sub range to be blocked.

Question 13:

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

07 should be reserved for mobile phones only.

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?

The only way to restore trust is to make the cost of the calls transparent. I would have both a price ceiling and a pre call message advising the tariff to be charged.

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?

No this would be a waste of number resources. Personal numbers (another form of non-geographical number) should be confined to the "09" class, a sub class of say "097" could hold over 99 million personal numbers.

Question 16:

Do you have any comments on the use of the 05 number range? No

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 ?

No, they are not coherent.

01, 02, and 03 should all be treated in the same way by the same telecom provider. 0p to 3p/min and no revenue sharing permitted.

04, 05 and 06 should be reserved (05 has a current residual use)

07 Mobile phones only

08 free-phone only

09 all revenue sharing and numbers charged outside the normal (01, 02 and 03) tariff. This range would cost between 1p and 150p/min, and include the so called personal numbers.

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?

The only satisfactory way to provide consumer protection, is to put the different types of calls into clearly defined and unambiguous number ranges.

The test to be applied should be: "Is the tariff to be applied to a particular number being dialled going to be obvious to the caller without detailed enquiry"

01, 02, and 03 (proposed) should all be treated in the same way by the same telecom provider. 0p to 3p/min and no revenue sharing permitted.

04, 05 and 06 should be reserved (05 has a current residual use)

07 Mobile phones only

08 free-phone only

09 all revenue sharing and numbers charged outside the normal (01, 02 and 03) tariff. This 09 range would cost between 1p and 150p/min depending on the sub-range. This would include the so called personal number range in a suitable sub-range of say, "097".

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?

The same tariff principals should apply to all telecom providers.

01,02 and 03 normal cost. (ie included in free call plans)

07 mobile tariffs

08 free-phone

09 all revenue sharing and numbers charged outside the normal (01, 02 and 03) tariff. This 09 range would cost between 1p and 150p/min depending on the sub-range. And would include the so called personal number range in a suitable sub-range.

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Question 20:

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

I do not think that the present numbering plan could effectively be communicated to the consumer as it contains the same mixture of revenue sharing in the 08 range that has caused so much confusion in the past.

Keep it simple – If a consumer sees “09” then he is alerted to the fact that the call is likely to cost more than a normal call. Simple and transparent. (US use “900” for higher cost calls)

Question 21:

What are your views on Ofcom’s analysis and the different options for number charging ?

The US and UK both have successful economies and do not charge anything for numbers.

Question 22:

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

see answer to Q 21

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 ?

The numbering plan should be clear, unambiguous and transparent. Numbers of different tariffs should not be mixed in the same section. Revenue sharing numbers should not be mixed in the same section as other numbers. For example 08 revenue sharing numbers should not be mixed with 0800 free-phone numbers or be capable of being described as “local” or “national” rate. Lack of clarity and transparency not only breaches the relevant EU directive on the matter, but allows organisations to exploit the consumer. The distinction between national and local rate numbers has been abolished in practice for over 99.9% of consumers, who paying one universal rate. The obsolete terms “national” and “local rate” are used to confuse consumers and help perpetuated overcharging of consumers; those terms should not be used in the numbering plan.

01,02 and the proposed 03, all at normal cost. (0p to 3p depending on consumers provider)

07 mobile tariffs

08 free-phone

09 all revenue sharing and numbers charged outside the normal (01, 02 and 03) tariff. This 09 range would cost between 1p and 150p/min depending on the sub-range. And would include the so called personal number range (now 070) in a suitable sub-range.

Question 24:

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

The geographical link should be maintained.

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? NO COMMENT.

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 ? NO COMMENT.

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 ? NO COMMENT.

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? NO COMMENT.

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Question 32:

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

The current system should be kept.

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 current system should be kept.

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?

I agree that the customers mistrust the present 08 (except free-phone) and 09. They also mistrust 070; they are mistrusted because consumers are uncertain as to the cost and nature of those numbers.

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 ?

None of the options proposed increase customer transparency of the 08 range. The current problems spring from the lack of transparency of the 08 range and the misleading descriptions of 087x and 084x numbers, leading to clandestine revenue sharing. All 08 numbers should be free-phone. Revenue sharing numbers should be confined to a suitable sub-range "09", priced between 1p and 150p/min, including so called personal numbers.

Question 36:

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

When the numbering plan is transparent, consumers, through market forces will force (or shamed) organisations to migrate to "03". To be transparent all revenue sharing numbers would have to be moved to a suitable sub-rang in the "09" class, costing between 1p and 150p/min. A price announcement in this 09 range should be compulsory. When consumers realise that 03 number are treated in the same way as 01 and 02 numbers and are included in various "free" call packages, this will increase the pressure on organisation to migrate to 03.

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?

A tariff announcement should be made on all calls costing more than the normal tariff (01 and 02).

Question 38:

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

No, a ceiling of 150p/min should be applied. Having no ceiling would invite fraud.

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 ?

Migration to 09 would be encouraged if consumers realised that all calls had a pre announcement as to tariff. This transparency would encourage trust. The price range of 09 should be 1p to 150p/min. Consumers would soon come to realise that some services are charged at reasonable rates.

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.

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 ?

By making pre call cost announcements.

Question 42:

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

Yes, but the blocks should be kept smaller than 100,000 to aid number conservation.

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

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070 (so called personal numbers) should be confined to a suitable sub class of "09". For example "097" can hold over 99 million numbers. A pre announcement of tariff, should be required, with a ceiling of 10p/min.

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?

Having no ceiling would invite fraud.

070 (so called personal numbers) should be confined to a suitable sub class of "09". For example "097" can hold over 99 million numbers. A pre announcement of tariff, should be required, with a ceiling of 10p/min.

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 ?

1 year or less.

Question 46:

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

070 (so called personal numbers) should be confined to a suitable sub class of "09". For example "097" can hold over 99 million numbers. A pre announcement of tariff, should be required, with a ceiling of 10p/min.

Question 47:

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

No comment.

Question 48:

Do you agree with these principles for number charging?

The US and UK both have strong economies and both do not charge. Charging would eventually be another form of taxation.

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 ?

see answer to Q48

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?

see answer to Q48

Question 52:

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

see answer to Q48

Question 53:

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

No comment.

Question 54:

How would charging for number blocks affect consumers ?

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The cost would be passed on to the consumer.

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?

see answer to Q48

Question 56:

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

The most annoying abuse consumers presently suffer is in the revenue sharing numbers 084x and 087x. The proposals do nothing to address this issue and some options proposed will aid and increase this abuse. The root of the abuse stems from the fact that 084x and 087x numbers are not clearly revenue sharing numbers and are often portrayed as no more than "local" or "national" rate numbers. They are clandestine revenue sharing numbers.

The only satisfactory way to solve this problem is to make all revenue sharing numbers obvious and transparent. This solution is not popular with some organisations, who rely on these numbers being a secret stream of revenue for the organisations themselves or the telecom providers or both. Transparency to them is an anathema, to be resisted at all cost. Transparency in tariff rates can only be achieved by consigning all revenue sharing numbers to a suitable sub set of a reorganised "09" range. "09" could be priced from 1p to 150p/min depending on the sub range used. So called personal numbers (070) should be placed in a suitable sub set of "09" (say 097).

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?

I would devise a simple and clear plan with all the current exceptions and anomalies removed.

01,02 and the proposed 03, all at normal cost. (0p to 3p/min depending on consumer provider)

07 mobile tariffs only

08 free-phone

09 all revenue sharing and numbers charged outside the normal (01, 02 and 03) tariff. This 09 range would cost between 1p and 150p/min depending on the sub-range. And would include the so called personal number range (now 070) in a suitable sub-range.

Keep it simple.

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 ?

Ofcom should implement the sanctions that they have, but at present do not enforce.

Question 59:

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

Any organisation engaged in scams should not be allocated numbers.

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 ?

Yes.

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?

The proposal to keep in place (and in some of the proposed options, extend the range of) revenue sharing in the 08 range, will increase abuse. Only by placing revenue sharing numbers in a reorganised "09" range will abuse be brought under control. Abuse prevails because of the lack of transparency of tariff of the present and proposed numbering plan.

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