

**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 Mark Rivkin

Representing (self or organisation/s): Self

Address (if not received by email):

**CONFIDENTIALITY**

What do you want Ofcom to keep confidential?

Nothing  Name/contact details/job title

Whole response  Organisation

Part of the response  If there is no separate annex, which parts?

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?yes

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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?*

I think that the general ideas are correct, however I think that the impact on small businesses such as myself should be carefully considered. I own an 0707 number which I am proud of, which is easy to remember, and which all customers can contact me on. I have just spent £1000s on stationary and business cards, and I feel that changing the number would cost me a large amount of money, and would lose me part of my company identity which I chose carefully in the first place.

*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 think consumers are becoming more wary about being ripped off, and will look in to charges carefully before dialing a number.

*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 think it is important that companies and individuals can be allocated a VOIP number as a landline without it being in a specific number range for VOIP only numbers (as it is at the moment).

*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?*

*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?*

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

Yes. I think this is a positive step.

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

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

*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)?*

*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?*

*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?*

I think that a tariff ceiling is a good idea on any number range. It is a bizarre idea that you can call a number without knowing how much it will cost. However, I don't think an enforced recorded message is appropriate, because for business users like me using a follow me number it will instantly make the consumer end the call. Also, the recorded messages are misleading when called from a different network such as mobiles, where prices are different.

*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. I think that having 070 differentiated from other mobile numbers is clear enough for most consumers. I don't think having yet another number range will help consumers appreciate the costs involved with calling the number. Infact it may only confuse them more.

I have a personal number that doesn't cost too much to call compared to normal mobiles. I use it so that i can change my internal number easily when working around the country - sometimes there is no reception on my mobile etc. I have printed this number all over £1000s of advertising and brochures, and promised my customers they can reach me on this number for life.

Even friends have been told that no matter where I move to you can always get me on that number because it can be redirected. That is the whole point of the number.

THis means that changing it should be avoided at all costs. Not only will it cost me (a small businss) £1000s, it will lead to many situations where I cannot reinform customers and lose them as a consequence.

I will also lose contact with friends who I promised can always call me on a

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personal number. I would never have made that promise with a mobile or a landline, however I thought the whole point of a personal 'follow me' number was that it was yours to redirect for life.

In my opinion personal numbers are the one number range that cannot be moved. The very nature that they are for personal use, and act as a single point of contact for businesses and people alike means the personal loss of contact cannot be underestimated.

It seems to me that it is essential for small businesses to have a number they can rely on keeping for the lifetime of their business. Without this they will always be reprinting business cards and losing customers. It also is logical that you can redirect the number when you move offices around the country. A personal number seemed the answer to all my needs. To move this now would be very unfair to businesses like me who use these numbers.

*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?*

*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?*

*Question 20 How do you think the new Numbering Plan could be effectively communicated to consumers?*

*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?*

*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?*

### Detailed questions from Annexes 1-5

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

*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?*

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*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?*

*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?*

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

*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?*

*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'?*

Having suggested moving 070 numbers to clear the 07 band for mobiles, adding a new sub section for mobile services seems like a step backwards.

*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?*

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*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 ?*

*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?*

*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?*

*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 sub-allocation to facilitate trading?*

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

*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?*

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*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?*

*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?*