

Response Name Withheld 37

Question 1:What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions? :

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? : Us consumers have wanted price transparency (your terminology). In other words we want to know how much these calls are regardless of where we call from. For example, there should be a call announcement from mobiles when calling 084x/087x numbers because they cost upto 40p/min compared to upto around 8p/min from a landline. A huge difference I'm sure you'll agree but yet you don't force the mobile networks to have a call announcement advising us of the calls so therefore consumer detriment/confusion still remains. I'm fully aware you are proposing the teleco's be more upfront/transparent with their call charges (bit late if you ask me) but that would mean relying specifically on all consumers to visit their teleco's website for these charges which would be fine except not everyone has access to the internet (therefore you could be seen as punishing those consumers who don't have access to the internet if no call announcement is not necessary in your view) or the fact that why would consumers do this when 084x is still known as local rate and 087x is still known as national rate (and described in most cases as such - from teleco's offering these numbers to businesses, 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? :

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? : Abuse? These numbers are in most cases only used to abuse consumers because we're not aware of the cost of these calls (especially from mobiles - see answer 2) and more importantly that a revenue is earned from them. Compare this to 09x numbers where consumers have to regardless of where advertised be transparent on call charges and that these premium rate numbers earn the company money from us calling.

The same thing applies (but on a lesser scale) to 08x numbers except we don't generally know the cost of these calls and don't know that revenue sharing is taking place.

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? : This shouldn't be needed because anyone wishing to continue with revenue share should use 09x range that was specifically designed for this principle and includes safeguards for us consumers - all of which are not available on existing revenue sharing 08x numbers. Why can't a company that currently uses, say an 0844 costing 5p/min, use an 09x range at the same cost?

With all of these consultations, I have become disillusioned if your role is to protect consumers or protect businesses?

As you obviously have no intention of curtailing the abuse of these numbers then an 03x number range where no revenue sharing is adopted would be ok provided that these calls are priced the same as geographical and included in call allowances. Why do you mention local/national rate when this would just confuse consumers because no provider now charges more/less for local/national calls.

Question 9:How should the '03' range be structured, in terms of tariffs and services? : Tariff should be the same as geographical numbers and included in inclusive minutes/call allowances. Your mentioning of local/national on this range will yet again confuse consumers.

Question 10:How should the '08' range be structured, in terms of tariffs and services? : They should be restructured logically. For example, 0844 1 is charged at a maximum of 1p/min, 0844 2 is charged at a maximum of 2p/min. Right now the 0844 range is in a complete mess and it is near impossible to get the accurate price of calling a number from this range. The non-broadcast ASA have guidelines in place that force companies to be transparent with call charges but yet the call broadcast ASA don't have any such thing. You claim to be consumer-orientated but refuse to intervene even though this mess was brought about by yourselves (and Oftel) and allowed to continue for years

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)? : Call transparency would help but as they are regulated by the ICSTIS and call charges have to be announced (unlike 08x which you allow to continue as it is) then it's not a big problem

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? : Adult only stuff should use it's own range(s) exclusively. This could possibly allow teleco's to block all premium rate numbers or adult-only premium rate numbers

Question 13: Are there any practical means by which the Numbering Plan could provide improved mobile tariff transparency?: Not that I can see. Due to number portability it makes no difference if a certain number was identified as being to a certain mobile network.

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? : These should be removed from existence. I'm not aware of any consumer using this as it's all mobiles now.

This range is used by companies to earn more revenue than is permitted on 08x numbers and without being subject to ICSTIS regulation. I'm aware that you apparently put a stop to revenue sharing but then a company simply purchases these numbers direct, etc and can then keep the revenue for themselves without ICSTIS regulation. This loophole which you've allowed with Patientline by changing the underlying numberplan so as to allow Patientline to continue with this abuse is used by some other companies as contact numbers and Ofsted use it for when ordering publications.

If you continue to allow this abuse (for which you seem to have already made your mind up) then a price ceiling and recorded message is needed. A price ceiling of 10p/min I believe is all that is necessary. Anymore then you are just allowing the abuse to continue without being regulated by ICSTIS which these companies are avoiding by using this loophole you've allowed to continue.

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?: This question doesn't apply if you put a stop to the abuse.

If you don't have any plans on stopping this abuse then it may be considered a good idea except a waste of a number range for the few 070 numbers that are in use by companies but keeping them on the same range as mobiles is definitely confusing to us consumers as they're easily interpreted to be a mobile number. The easiest solution to stop the use of these numbers - thus saving the 06x range for future use

Question 16: Do you have any comments on the use of the 05 number range?: No as its rare you get these numbers but I would suggest that these numbers be migrated to other relevant numbers (ie freephone 0800/0808) so make it clearer for us consumers and freeing this number range for future use.

One thing that is shown by this complete mess of numbers is that our regulator seem to be unable to think ahead otherwise all these constant consultations on 08x numbers wouldn't be needed.

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, for the reasons I've mentioned in my reply.

You seem to have a policy of very slowly over years (in some cases) of introducing such changes which again just benefits the companies/organisations, etc not us end users/consumers.

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?: I'm not entirely sure what you mean but if you mean for example that 08x numbers should be charged the same on all networks (including mobiles) then the answer is yes. This would help towards price transparency.

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 ?: I suggest you start listening to consumers and fulfilling your obligations to consumers instead of tending to side with that of companies that continue to use these numbers unregulated without price transparency just so they can continue revenue sharing - despite that is what 09x range was designed for.

Question 24:What do you think of Ofcom's proposed general approach to managing geographic numbers?: Smaller blocks will help but I don't think that introducing charging for these numbers helps because these charges will ultimately be passed on to us consumers.

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?: You have identified only SOME problems us consumers face but still choose to do nothing in most cases.

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 ?:

Question 36: How might early migration to the ?03? range be encouraged?: by it being very clear from the outset that these calls are charged the same as geographical numbers unlike all existing 08x numbers and are included in consumer tariffs again unlike existing 08x numbers.

You should ensure that businesses are clearly informed that their so-called local rate 084x and so-called national rate 087x numbers are not as they appear and actually cost consumers a lot more (upto 40p/min) and are not included in call packages we may have. A lot of businesses are still under the impression that these are local/national rate mostly thanks to teleco's still marketing these numbers as local/national rate including BT themselves on their bills.

These numbers should be made to be as cheap as possible for businesses/gov depts to use. In other words, businesses should not have to pay a per minute charge for any incoming calls they get. They will, if needed, have to pay for call routing but that would just be an additional fixed charge.

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?: If the 09x number is a fixed charge per call then this should be clearly mentioned.

If its a per minute type call then it should be clearly identified as costing x amount per minute. If the call length can in most cases be expected to last a certain time then the likely length of the call should be clearly identified.

I believe this is what happens now but not entirely sure.

Question 38:Should there be any PRS number ranges with no tariff ceiling ?: No, where is consumer protection in that? This would be open to constant abuse.

Why have you even mentioned this?

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??: If you mean mobile numbers when you mean mobile services then I'd say yes. This allows future expansion of mobile numbers as and when necessary

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 ?: Isn't this used now with regards to 80 shortcode numbers when texting, etc? I believe it better to leave it as it is otherwise it would be easy for a consumer to think he/she was texting another mobile number if the 071-075 range was used for this. This seems like there isn't a problem except for the fact that texting 80 shortcode numbers isn't included in inclusive text allowances so us consumers now know that only texting 07x numbers are included in text allowances. Allowing the 071-075 range for the same thing but it being chargeable and not included in inclusive text allowances, etc would just add to consumer confusion.

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: Already answered

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?: What difference would it make? They wont be calling themselves so why would they even care. Those companies that currently use this loophole to earn revenue don't care and are obviously don't want to let consumers know the cost otherwise they would use 09x numbers instead. As mentioned earlier, these numbers are generally used to earn revenue bypassing consumer safeguards and you continue to let this happen!

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 ?: 6months. Anymore and you are, as usual, tending to side with that of companies and not us end consumers.

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?: No strengths that I can see. The weaknesses seems to be that at one time 084x did cost the same as local rate and 087x did cost the same national rate but competition has brought geographical local/national rates down. In addition, most consumers have inclusive call packages which don't include these numbers simply because they cost so much and they cost so much because you allow the revenue sharing to continue on them.

To accomodate the misuse of these numbers, you seem to keep changing the Numbering Plan which ultimately is to the detriment to us consumers.

Question 48: Do you agree with these principles for number charging?: If you are referring to charging teleco's for numbers they want from you then no because as mentioned earlier this charge will just be passed on to us end consumers.

Why do you seem to ask the same question again but worded slightly different?

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 ?: See above

Question 50: Do you agree that charging for numbers could disincentivise economically inefficient behaviour, and incentivise economically efficient utilisation ?: See answer 48

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 ?: It would ultimately be passed on to us.

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?: Answered in my answers above. I have highlighted current abuses in the relevant questions above.

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?: These companies that seriously abuse consumers should be barred from getting anymore numbers.

Question 59: Are there any other circumstances in which it may be appropriate for Ofcom to refuse number allocations?: See answer 58.

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?: Have all revenue sharing numbers regulated by ICSTIS or migrated to where they belong on 09x numbers.

At the very least call queuing should not be allowed (as is the case for 09x numbers) on all 08x numbers like 084x numbers. This would help reduce abuses that are going to occur now that companies are likely to migrate from 0870 to 0844 numbers.

Additional Comments: This consultation was in no way user-friendly whatsoever. Other consultations had a user-friendly summary and in some cases the questions were split between full and user-friendly (ie consumer use). This had neither, was off-putting by over 60 questions most of which were worded to technical to be answered by consumers even though a lot of the questions concerned us end consumers.

In fact, I plan on taking this further to my MP and other relevant bodies you may answer to - highlighting just how you seem to be more on the side of businesses than us end consumers for which this consultation appears to prove this and the general way in which these abuses have been allowed to continue despite having consultation, after consultation and getting over 1000 responses about these abuses.