

Consumer Panel: advice to Ofcom Response to Consultation



Title of Ofcom Project:	Telephone Numbering: safeguarding the future of numbers
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1. The Consumer Panel recognises the present need for telephone number conservation and a general review of the numbering plan. The review is being undertaken at a time when telephone numbers and their relationship with people is changing. The near universality of mobile phones has perhaps had the largest impact on this relationship. For many the mobile number has become their primary and personal number, which they port between networks - a nomadic service not tied to a local or geographic price.
2. The rollout of Next Generation Networks (NGN) will also impact on numbering and as the consultation states number conservation may only be a short-term measure until the NGN framework is complete. An NGN network may well permit the allocation of numbers at the granularity of one and not by blocks.

Geographic Number Conservation and Market-Based Mechanisms

3. We recognise the short-term need for number conservation in certain areas. With this in mind we agree with the proposed changes by Ofcom to number allocations in order to increase number utilisation. That being: Ofcom audits an area's needs for the period of five years and increases the number of conservation areas; to introduce 10 000 number allocation blocks (down from 100 000), and 1000 number blocks in conservation areas; in those areas of the country where numbers still face exhaustion for Ofcom to use overlay codes as a fallback option; and the introduction of a charge to communication providers when being allocated numbers. The present system of free number allocation does not provide any incentive to a communication provider to use their numbers efficiently and a market-based allocation approach will hopefully remedy this. We reserve

comment on how Ofcom should charge communication providers for number allocation until Ofcom finishes its own research in this area.

4. We agree with Ofcom's principles to ensure that any proposed cost on numbers is fair, proportionate, promotes efficient utilisation and does not unduly discriminate between communications providers. However, in an IP world numbers would not need conserving and we would expect Ofcom to remove this market-based regulation from industry - fitting in with Ofcom's intention to not intervene in markets where intervention is not required and to reduce regulatory burdens where possible on business.

Countrywide numbers

5. We welcome the introduction of a non-geographic non revenue sharing number on the 03 range. We hope as do Ofcom that it will provide a number range for companies that desire a national presence but do not want to generate revenue - for example, public bodies.

Premium Rate Services

6. We do not specifically want to comment on PRS numbers having just responded to the Ofcom NTS consultation. What we would say is that solely 'tidying' up the number range will do little unless consumers have confidence in these number ranges which will only be achieved by clear and accurate pricing made available to consumers. We do welcome the restoration of the geographic link to the 0870 number range set out in the consultation.

Mobile and Personal Numbers

7. We think the introduction of a new number range, 06, for personal numbers and stopping any new personal numbering services opening on the 070 range is sensible in order to introduce transparency to the numbering plan. The 07 number range is clearly identified with mobile phones. Also, we agree with the proposed transitional period of 3 years to minimise businesses migration costs to the new range.
8. We agree with Ofcom's proposal to place a ceiling on call charges to the personal number range as it will help stop scams operating on this range. We are not in the position to state what the price ceiling should be but to have an effect we believe it should be as low as possible. We also think the proposed consumer test (see below) will help provide additional protection to consumers from scams operating on the number range. We do question Ofcom's view that companies such as those that provide service within hospitals, for example, should be exempt from the price ceiling. Such a company operates within a monopolistic environment and the personal number is rarely used as a follow me number as a patient moves from ward to ward.

9. We understand that the intention of the new number range on 06 is effectively a relaunch for personal numbers, which has so far failed to take-off. When personal numbers were first introduced there was a logical argument that a follow-me number could benefit people. Today, the ubiquity of the mobile phone has introduced a defacto follow-me service; as have services like call forwarding and IP PBX. Neither of these have required a separate numbering range. The Panel asks Ofcom to look again at the issue of personal numbers and whether this regulatory intervention is necessary.

Consumer Protection Test

10. We think the tariff levels for the number plan should be set wider to all fixed line operators than for those calls which originate on the BT network. As Ofcom points out it weakens customer understanding and price transparency of call costs if the cost of the number ranges is not consistent across all the networks. We understand that the same can not be said of call costs on mobile networks due to the differing interconnect charges. We ask Ofcom to undertake research into this area and see what possible measures could be introduced to ensure price transparency and customer understanding of the numbering plan is increased when making calls from a mobile.
11. We welcome Ofcom's intention to set service definitions for the differing number ranges. This will not only help consumer understanding of the numbering plan but also help Ofcom combat scams and abuses, e.g. fax back scams on the personal number range. It is sensible that 'service definitions must accurately and precisely describe the service being offered (and) exclude those services which are not to be offered (and) do so in language which is comprehensible to consumers'. We agree with Ofcom that it must be careful when defining strict guidelines it does not invoke the law of unintended consequences. And while the 'use of mobile numbers to deliver non-mobile services' is the cited example by Ofcom there must be flex within the guidelines to ensure technological innovation is not stifled so that future services not yet thought of are able to be delivered to consumers.
12. We agree with the conditions to be set on providers who wish to be allocated numbers and with the suggested appropriate criteria. Often when one scam is closed down the same people merely re-open business under another name. The proposed criteria will be an additional tool to curb these criminal activities. As will the proposal by Ofcom to withdraw numbers from providers causing harm. But as Ofcom points out it must ensure that the withdrawal of numbers does not then cause greater detriment to the consumer by removing the number and the consumer suddenly finding themselves without a number and access to the network.