

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: *M.K.H. PANK*

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?

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Name *[Signature]*

Signed (if hard copy) *26/04/06.*

Telephone Numbering Consultation

Safeguarding the future of numbers

Consultation Submissions from the Summary Document

In your proposals for the above you point out that you would open up two new codes 03 and 06. I suggest, in the case of 03 this will not be necessary if the consultation on "Number Translation Services" concludes that 0870 and 0845 numbers revert to geographic call charges, that appeared to be put forward by Ofcom in the NTS proposals which are being substantiated in a very high number of responses with the dissatisfaction of the charges, as no one can fully understand the charges. One exception being, the pay-as-you-go internet access on 0845 numbers, these are numbers used for outgoing service only. The 0844 range seems to have a very high percentage of numbers used for outgoing services, therefore, anyone using these numbers will know the cost of the service. As the 087 numbers would be at geographic call rates, you would be able to use 081,3,5,7,8 and 9 for countywide numbers, safeguarding 03 numbers. As you indicate that you are looking for a possible five year plan because technology will have moved on and a completely new format may have to be involved by 2010/12.

On page one number 1.6 dot 3 you signal "03 numbers tightly linked to the charges of geographic numbers" at 1.29 "as covering clearly-understood services and price ranges" with 1.29 dot 1 "call tariffs would be the same as geographic rates" which will it be - and would the companies be able to offer discounts as they do now for 01/02 numbers?

At 1.10 dot 3 with 1.30/31 why would 2-digit level in the 08 range be more transparent if the owner is not forced to state the price of the call? Will the 088/089 be above the 087 which is "8ppm or less"? If it continues as it is now with 0871 10ppm(not stated)how will the customer know the cost of calling 081 or 089 if it is not stated. By making all 08 numbers that do not wish to charge geographic rates, with the exceptions already specified above, even 084 should move eventually to the 09 level, they would then have to state the charge for the call and would also take a percentage of the cost of the call it would then be absolutely transparent for all parties. I refer for judgment, even as you state "Services which require a small micro-payment", a caller can pay three times as much as a normal call 01/02 3ppm, to call 0871 is 10ppm. I submit, this is larger than a micro-payment for the customer to make the call. The original reason for 0845/0870 has been over taken by changes in charging with the one price to call anywhere in the UK the 08 group has become untenable after July 2004.

The reason for 1.28 is that companies can make money, albeit small amounts, I suggest, you answer the reasons in 1.27. In 1.28 how will this deliver further benefits to consumers, what are the benefits at the moment?

In 1.29, dot 3 you make reference to a possible problem with international calls on 03 what about 06?

At 1.32. The reason that this is one type of "08 number that is well-recognised and trusted by consumers" is because in most adverts it is **stated** "Freephone".

In 1.33, 99.9 percent of customers are only interested in the cost of the call, which they will be told on the 09 group, they will know who and why they are calling.

At 1.35/36/37/38/39 you express a view that 070 services have had "relatively little market impact with abuse of the number" why then does Ofcom continue with this type of facility when there is a lack of interest in the service. I suggest, a standard mobile number is a "Personal Number"/"Individual Number" which is a "Follow-me" type service as it can be used anywhere in the UK and abroad with the system finding you just as 070 numbers. You do not indicate the charge ceiling that you intend to impose and why do you consider this will rectify the problems with 070. You would allow the current 070 services to migrate perhaps within three years, it would be better that they just cease over the three year period, then it would not be necessary to open the 06 level at this stage, again helping to stop more confusion in charging, as at this time you do not give any idea of the cost to call the 06 numbers. The 0500 was to migrate to 0800 but six years on 0500 is still in use.

One could then use the following table A for the next, say, five years.

Table A

Numbers starting:	Service provide:
01 02	Geographic numbers *
03 04 05 06	Reserved
07	Mobile
080	Freephone
082	Dedicated to Schools'
084	Chargeable services
081:083 085:086	Countrywide numbers *
087:088:089	
09	Chargeable services
	* Charged at Geographic rates

Your new and exiting levels:

03	Chargeable not yet stated	0845	Chargeable 3ppm
06	Chargeable not yet stated	0870	Chargeable 8ppm or less
0844	Chargeable 5ppm or less	0871	Chargeable 10ppm

The 08 range will always be a mix of prices however it ends up in the future with the possibility of the new arrangement having nine charge groups. I refer for consideration, the above "Table A" would safeguard the future of numbers, with a view to give more time in trying to look beyond the next five years and predict the way technology and customer behaviour will evolve, as it offers a saving of numbers and uses number ranges that are already known by the general telephone users and only has **five** charge groups which could be in operation within the next one/two years without opening new levels. If one goes into a shop you are able to see the price of the item before you buy, in the 08 range that charge, the cost of the call maybe 5p or less or perhaps 8p more or less or 10p or some other cost not identified, therefore, I submit, complete confusion as one does not know the cost of the call until you receive your bill. The smaller number of charge groups the easier for everyone to understand the cost of a call, therefore, we should, except for 080 and 082 numbers, have only the following groups:

Geographic charge rates
 Mobile charge rates
 All other charge rates on the 09 level

A total of three charge groups.

N.B. All the above charges are based on BT rates.

Footnote:

In the NTS booklet under the heading "Improved consumer information about call prices" in other words "Transparency in call charges" in the Ofcom's responses to the NTS September 2005 consultation, you state the findings were "Broadly similar to the proposals set out in the September 2005 consultation" therefore, did Ofcom use any ideas from the 1308 submissions. It would appear not because, reading 1.29 to 1.37 and taking one example 1.33, I suggest, the only people it did **not** help are the customers who will have to call the 0871 numbers at higher costs, which, I put forward, does not satisfy the points put forward in the NTS booklet. How can you justify the statement that moving 0871 numbers to the 09 range "It would not give more significant benefits in terms of improving price transparency". You may be aware that the organisations change their numbers from 0870 to 0871 numbers to make more profit, they do not seem concerned about costs, therefore, the only people that are pleased with the report are the Communication providers, resellers and services providers. At 1.51 this would indicate that you are just moving the problem to another level.