

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: Peter Potter

Representing (self or organisation/s): self

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

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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?*

Alright up to a point, but I would like to see an end to 0870 and 090 numbers altogether. Also, an 030 national number is no better than an 0845/0870 number.

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?*

Most consumers I have spoken to agree that 090 and 0870 numbers are perfect for # scammers, since most people are not aware of their meaning. Even the new numbering proposed will be very confusing, particularly for the disabled and elderly.

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?*

Your reasons for making these code changes are irrelevant, since additional numbers can be provided simply by splitting cities, towns and parishes into additional areas, just as London is 0207 and 0208, it could be divided into smaller areas using 0207 to 0297 and 0208 to 0298

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?*

See Question 3. b) What transparency? c) Consumer abuse is rife, and I welcome your efforts to prevent this. However, most scammers and phishers, being criminals, will find some way round it.

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?*

No

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

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?*

Yes. However, as people become older, and thus more confused, so they will find any system of numbering difficult.

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

It is unclear whether you mean a replacement for 0870 (which is revenue sharing, and tantamount to a premium number) or a code covering the whole of England instead of geographical areas.

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

Well, since I don't know what structure you plan, I would suggest 03 tariffs be geographically distributed, if you do change to 03 for the whole country. The main problem, as I see it, is that people are going to have to do a lot of phoning, letters, emails, etc. to tell their friends in the UK and abroad that they have a new number. This could become costly for someone like me, who has many friends abroad - except that in most cases I can email them! The cost to companies would be much larger.

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

No, it should be closed altogether, or changed to normal tariffs. I have an 0845 number in addition to my normal 0118 number (the 0845 redirects to my home phone for those, like my brother, who is 300 miles away. It was given free with my change to a new phone provider).

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)?*

The 09 range should be abolished.

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?*

While there might be merit in an "adults only" classification, this could easily be overridden by paedophiles, and children could very easily gain access to the adult only number. There again, abolish the 09 range and you remove reasons for sex shops and others to earn revenue which they don't deserve.

Question 13 *Are there any practical means by which the Numbering Plan could provide improved mobile tariff transparency?*

If you are going to include the mobile numbering in this plan that trebles the number of calls people will need to make to advise friends. Is this whole plan in fact aimed at increasing the phone provider's revenue?

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'm not sure I can agree with personal numbers either, but if they have to be the tariff ceiling should be around 20p.

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 am suspicious of this whole process. Why go to the expense of consultations, papers, meetings, etc. just to change a system which can be changed much more simply. I seem to remember during the last number change that it would save having to make any further changes, giving complete extensibility.

Question 16 *Do you have any comments on the use of the 05 number range?*

Same as above

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?

Coherent, no, comprehensive, far too much

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?

There must be a free phone number which people can use to report scams and phishing, or whatever comes in the future. There should also be measures which would close down the person or company. The main problem is that such calls often come from abroad. I was very pleased to here that Moscow has taken action.

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?

Yes, so long as they are low enough.

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

By sending every main telephone user (head offices of companies, individual consumers and people who use mobiles as their main phone) full details of the changes and making every telephone service provider send new numbering proposals to every member.

Question 21 What are your views on Ofcom's analysis and the different options for number charging?

Too complex, particularly for the disabled and elderly.

Question 22 Which, if any, numbers might appropriately be allocated using a value-based charge?

None.

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?

See Question 3.

Detailed questions from Annexes 1-5

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

In this section, I am particularly opposed to this process of supplying blocks of numbers to large users. This Numbering Plan would be unnecessary if all spare numbers could be allocated to new requests. It is entirely wasteful to allocate block of numbers, many of which would remained unused for year

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?

The implementation of a demand model would depend to some extent on liaison with local authority planning departments and the Home Office. New towns, or large extensions to existing towns, can place pressure on the system almost undetected to users. This is where block allocations are bad, since it ties up numbers which should be brought into general use.

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?*

Yes, generally. However, there would not be surprises in conservation if block allocations were withdrawn and good liaison with planners was available.

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?*

Perhaps in the short term, but technology tends to increase with demand.

Question 28 *Do you agree with Ofcom's assessment of the impact of conservation measures on stakeholders?*

Yes

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?*

The main practical issue is cost, and I don't see any justification for a change of this magnitude.

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?*

Overlay codes should be used in areas with large demand (Reading is on an expansion curve).

Question 31 *What are your views on closing the scheme, and Ofcom's assessment of it, as a fallback option to increase number supply?*

Agree

Question 32 *What are your views on wide area codes, and Ofcom's assessment of them, as a fallback option to increase number supply?*

I know of no country with wide area codes, and my suggestions to increase number supply are covered earlier in this questionnaire.

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?*

Government Office regions.

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?*

Yes

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?*

All providers of services using lines costing above the BT National Rate should be required to announce costs before the call is passed to the number.

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

Don't "encourage" it, just impose it.

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?*

See Question 35

Question 38 *Should there be any PRS number ranges with no tariff ceiling?*

No

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?*

09 numbers should be abolished.

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, definitely

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?*

Reserve the higher number (074/075) and require service providers to publicise pricing.

Question 42 *Do you support the use of 100,000-number blocks in allocating mobile numbers to new mobile voice providers?*

I do not support block numbering at all.

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 ?*

15ppm

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?*

To some extent. There must be no prevention on disclosure

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?*

6 months

Question 46 *What issues do you think would need to be resolved before Ofcom makes individual numbers available for direct allocation to end users?*

Costs

Question 47 *What do you consider to be the main strengths and weaknesses of the current rules-based system of UK number allocation?*

Strengths - known parameters; Weaknesses - Restricting change

Question 48 *Do you agree with these principles for number charging?*

No

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?*

You must consider the effects on the disabled, elderly and young people.

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

Not really. Charging could disincentivise take-up

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?*

No, they would not be preferable to conservation measures and some changes.

Question 52 *How might existing number allocation rules be reduced if charging for numbers was introduced?*

Charging should not replace rules, where they are in place

Question 53 *What are your views on this illustrative charging mechanism, and would you suggest any changes or alternatives to it?*

I am against it

Question 54 *How would charging for number blocks affect consumers?*

Customers would be charged more for services.

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?*

Gobbledegook!

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

All abuse.

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 am not in favour of extensions to the tariffing provisions

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?

The conditions are a good start, but need extending. You must battle abuse of the

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

Where a provider's customers have submitted over 50 complaints to Ofcom.

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?

The main problem in this is that abusive callers could simply move abroad.

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?

I am not familiar enough with abuse patterns to comment on the first part, but would suggest all service providers should be asked to set up an abuse department.