Response Clifford Russell

Question 1:What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions? : The use of 0845, 0870 and other non-geographic numbers should be priced such that their tarriffs are identical to whether a caller called a land line.

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? : These numbers are currently good for BT land line customers where an 0845 is charged at a local rate. For other operators, or people using call plans, these are much more expensive. For people who use pay as you go phones - they can be very expensive, and my concern is that this will impact on the poorest families the most.

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?
: Numbers need to give consumers a clear indication of pricing. I was recently robbed by an 070 call scam to the tune of £10. They called my mobile and hung up. I assumed it was another mobile so called back as it was part of my inclusive minutes. I chatted for 10 minutes and received a bill for £10. The recipient's service provider would have been the major beneficiary. To prevent such frauds, I would like to see all telcos giving the customers an alert on what a call will cost after they have dialled the number. I currently receive this from www.1899.com and find it invaluable. It's also the same on mobiles. I can call somebody on one number and get a free call one day. They take their number to a new service provider and on the next day, that call is 40p per minute. Consumers have absolutely no way of knowing what a call will cost 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? : Unless a clear indication of the price of a call is given at the point of dialling, the price will never be known and this will be an irresistable temptation for operators and service providers to use these channels as another way of creating revenue. Charges should be for the service delivered, not the channel used.

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. The best way to do it is to make NGNs tied to their land line equivalents for pricing, make consumers aware of the price of each call up front and to let the markets decide.

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?: No. By shifting to a scheme where pricing is announced upfront, the need to know whether a number is geographic or not disappears, which in turn liberatres ofcom to be more flexible in number allocation. It also reduces the demands placed upon the consumer.

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? : I feel that the time has come to allow the notion of individual platform and location numbers to come to fruition. The question is one of pricing and as long as consumers can be protected and confident, I do not feel that they care about the numbers.

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

Question 9:How should the ?03? range be structured, in terms of tariffs and services ?: They should be pegged by statute to their natural equivalents. Where a number can perhaps lead to a mobile, some form of cost share should be put in place.

Question 10:How should the ?08? range be structured, in terms of tariffs and services?: The 08 range is currently a mess. We all know 0800 and 0845, but beyond that, it's confusing. Is 0808 free? I asked my family and friends and most thought it would incur a charge. The other insane range which should be 0898 are the 070 numbers. We all know 0898 is going to cost a large sum to call and 070 numbers which look like mobiles should be put in the 0898 range to alert consumers.

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?: Yes. Mobiles are widely used by minors and it is appropriate for a parent to be able to easily control content. My three phone has soft porn on it and I have asked them to remove it, but they will not.

Question 13:Are there any practical means by which the Numbering Plan could provide improved mobile tariff transparency?: Yes. A simple "4p per minute" warning having dialed a call before connecting is all that is required.

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? : Personal numbers should be categorised into mobile and or landline and the tarriffs should be pegged to match these. Currently I know of several people who have been robbed by service providers on 070 numbers including myself.

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?: Personal numbers should be placed according to charges. I want a clear STD code that says "This is Expensive/Adult whatever" so I can avoid these numbers.

Question 16:Do you have any comments on the use of the 05 number range?: No.

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 ?: The status quo favours BT over other operators and encourages fraudulent scams. Local councils offering 0845 numbers create social exclusion. The problems are rife and the consumers have no effective way of knowing what a call will cost. Changes are long overdue and failure to enact improvements means the markets will remain skewed to BT and people will continue to be fleeced.

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?: The question is "Would the man on the Clapham Omnibus be able to explain how much a call will cost him to a specific number?"

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

Question 20:How do you think the new Numbering Plan could be effectively communicated to consumers?: Verbal notification on all calls. Beyond that, it's one of those things where a clear and consise A6 flyer needs to be mailed to every home in the country. If it can't be explained so that a granny of 80 receiving it can understand it on an A6 flyer, then your proposals are too complicated.

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 ?:

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?: If I could have a "Number for Life" which was only going to cost people calling me the same as a land line, I would jump at the chance to change. By encouraging people to adopt these, the need to ration other numbers will diminish.

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 ?: The upper limit is really the length of number that people can remember. I do not believe that extending beyond a 5 digit STD code and 6 digit number is practical - purely due to the human factors.

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 ?: Yes, but the tarriff should be broadcast upfront, consumers should press a button to accept this and the running total should be broadcast avery 60 seconds.

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??: Yes. I also think that 070 should be completely removed and placed elsewhere.

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 ?: Yes.

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:

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?: Purchases of PNS's read the small print. It is the casual caller to those numbers who needs protecting.

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 ?: It should be stopped immediately. A new digit should be inserted and then all numbers could carry on as was. An alert should be put on the advise callers of the changes and also the actual charge they will incur.

Question 46:What issues do you think would need to be resolved before Ofcom makes individual numbers available for direct allocation to end users?: A statutory obligation to peg pricing to the land line equivalents.

Question 47:What do you consider to be the main strengths and weaknesses of the current rules-based system of UK number allocation?: With a few exceptions (0800, 0845, 0898, 020) nobody really knows what is going on. Simply flicking through my tarriff guide from NTL was an amazing experience. Pages on the subject.

Question 48:Do you agree with these principles for number charging?: With reservations.

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 ?: No.

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 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?:

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 ?:

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?:

Additional Comments: