

Additional Comments

Ofcom has previously reserved certain number bands for particular purposes in order to assist users understand charges however these have been abused and not only by scammers. An example was London BusinessLink using an 070 'Personal Number' as a disguised premium rate service. Organisations such as the BBC have continued to promote 0845 and 0870 as 'local' and 'national' rate long after they should have ceased this practice. BT is making significant charges for incoming calls to its 05 Broadband service. These numbers are rarely included in call packages.

Patientline and similar services have offered premium rate calls which some phone companies (NTL) don't give the rates for and when pressed give incorrect rates. There being so many bands that even they've lost track of them. This being the case it is unreasonable to have such a random variety of price bands. The boundaries of ICSTIS are unclear here given that they are supposed to cover premium rate numbers, of which, Patientline is clearly one.

The cost of calls from fixed to mobile phones should be made transparent with many fewer charging bands.

05 for nationally distributed organisations never took off. The proposal for 03 numbers sounds interesting, especially if current users of 0845 numbers could be persuaded to move to them but would providers include them in their basic packages without an Ofcom ruling?

I don't like the term 'NGN' Next Generation Networks. How about a competition for a better name?

All the IP voice services do need to connect together without needing bi-lateral access codes – as used by SIP services. They are already issuing their own numbers. Skype uses names rather than numbers.

Question 1 – Strategy

Generally agreeable however the number of price bands should be significantly decreased in order to improve transparency. 07 currently has a vast number rates are completely unpredictable.

Question 2 – Consumer views

VOIP companies are already obtaining geographic numbers from various areas around the country which can be used, or are being promoted, as 'Out-of-area' numbers.

Question 3 – Future technology

Users want all systems to interconnect with ease as has been demonstrated many times before. Enabling BT of use 05 numbers as access to it's VOIP has enable them to make significant charges to callers.

Question 4 – Current challenges

Fails to mention the chaotic sub-ranges in the 07 band and the scope for abuse by companies such as Patientline.

Question 5 – Conservation

Yes

Question 6 – Overlay codes

Probably as it will bring less disruption than the alternatives although it's ironic that Brighton's 0791 code was merged into the then 0273 code

Question 7 – Geographic identity

Yes. 01 and 02 numbers have clear geographic meaning to callers VoIP services could be restricted to the proposed 03 numbers.

Question 8 – 03 numbers

Agree. Option 3

Question 9 – 03 Tarriffing

Local rate and national rate appear to have merged in most cases other than as misleading terms for 0845 and 0870 so Option 3(a) seems too late to introduce.

Question 10 – 08 numbers

Any of Option 3 choices would be agreeable

Question 13 – Mobile tariff transparency

Callers are entitled to know the rate but Numbering plans probably cannot help here. There is virtually no competition for calls to mobiles. One option is to have a rate agreed by the industry then the operators with their customers gaining or losing rather than the caller.

Question 14

See answer to Q13

Question 16 05 numbers

055 Corporate numbering might be merged into 03 numbers

056 VoIP termination. BT have been charging 5ppm to incoming calls – probably best merged into 03 numbers at 01 / 02 rates.

Question 17 Roadmap

No mention of Pan-European numbering scheme, which if it happened, would have a major impact.

Question 18 Consumer abuse

Until very recently the BBC has been saying 'Local rate 0845' which is still an abuse.

Question 19 All providers

Yes clearly the rules should apply without fear or favour to all providers.

Callers need to be made aware of deviations from their expectations. See Q20

Question 20 Communication to Consumers

Consumers should be warned at the time if a call is more than 10% more expensive than normal.

Providers must provide a code charge calculator both on the web and on the phone whereby the intending caller can enter the dialling code and be given the rate that that provider charges. Having to look up two tables on the web or waiting in a queue is unacceptable. There should be few enough bands that consumers can understand. It made commercial sense for BT, when they managed numbering, to obscure rates but Ofcom should be working in the public interest.

Question 24 Geographic numbering

Although the significance of geographic numbers is rapidly vanishing for pricing it is still valued by consumers as a way of identifying which companies are locally based. Out of area users should be given 03 numbers instead.

Question 30 Overlay codes

Perhaps a referendum or opinion polls could be held for the people affected

Question 31 Closing the Scheme

The ability to dial local numbers with just 6 digits is valuable to consumers. Where, in Wide area numbering, it is already 8 digits and only a further 3 are required a prefix the value of an open scheme is reduced.

Question 32 Wide area

Keep Wide area codes as an option for the future

Question 35 08 numbers

Consumers believe 08 and 09 number, other than 0800 and possibly 00800, are expensive and given that 0870 numbers are outside most packages they are for the long calls to call centres. Once 03 becomes available is it worth the effort of trying to row backwards? The concept of local rate and national rate is now almost meaningless.

Question 36 Encouragement for 03 numbers

Getting included in common packages is the starting point.

Question 40 07 as a mobile brand

Yes

Question 43 Ceiling on calls to 070

Personal numbers should be moved off 070 – see Question 40

Personal numbers might better fit into the 08 or 09 ranges and the ceilings should match those in the appropriate 08 or 09 range. 070 numbers are fundamentally the same as 08 numbers and would be less confusing to callers to merge them into the 08 range. The more ranges there are the more confusing it is for callers. 01, 02, 03, 07 (mobiles only), 08 and 09 should be sufficient.

Question 44 Personal numbers

Callers should be warned at the time of using if any call is more than 10% above the norm for that two or three number group

Question 46

Don't release 06 numbers at this time. It has been demonstrated before that opening a whole range for a few small specialist usages does not help the consumer and often requires reclaiming them later.

Question 47

Supply and demand is not the primary principle here rather it is clarity for the user, not the sophisticated user but the casual user. Hence the initial digits should provide the basic information most people only look at the first digit after the initial zero. With all other products the consumer is entitled to see the price before deciding to purchase. Telephone bills do not differentiate between weekdays and weekends even when itemised, long, after the event. Bank Holidays are rarely treated as Weekend rate despite the majority of consumers assuming that this is the case.

The current tariffs associated with 07 are impossible complex and may suit the service providers but are positively opaque to the user – even more so when a major provider (NTL) is unable to provide the rate on request for Patientline. The existing approach was inherited from British Telecom which did not have clarity as it's top priority.

Question 56

The greatest abuse has been from major companies using 0870 as the only published numbers surely this dwarfs all other abuse calling 'National Rate' when it is nothing of the sort. This is followed by 0845.