



Llywodraeth Cynulliad Cymru
Welsh Assembly Government

BASIC DETAILS

Consultation title: Telephone numbering – safeguarding the future of numbers

To (Ofcom contact): Nic Green

Name of respondent: Richard Sewell

Representing (self or organisation/s): Welsh Assembly Government

Address (if not received by email):

CONFIDENTIALITY

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Name Richard Sewell

Signed (if hard copy)

Nic Green

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Dear Nic Green

Telephone numbering: safeguarding the future of numbers

I am providing the Welsh Assembly Government's response to Ofcom's consultation on telephone numbering – safeguarding the future of numbers. We would like to thank Ofcom for the opportunity to provide a response on this issue.

We agree with the underlying strategic principles guiding Ofcom's policy approach, identified in this consultation as:

- to maintain the availability of telephone numbers to consumers, so that they can access the services that they value
- to maintain the continuity and meaning that is provided by numbers and which is valued by consumers
- to allocate numbers in a manner that delivers the benefits of competition to consumers, and that does not inappropriately discriminate between different providers, or the networks and technologies used by those providers
- to allocate and manage numbers in a manner that does not unnecessarily expose consumers to abuse

We acknowledge Ofcom's proposed numbering plan and agree that it has the potential to introduce clarity for both consumers and suppliers, to improve tariff transparency and consumer protection and to introduce more efficient mechanisms for allocating numbers in future.

Regarding the need to increase the supply of geographic numbers, we note that Ofcom has identified the following three options:

- overlay codes
- closing the numbering scheme
- wide area codes

We understand that the wide area codes option involves instigating a code change, requiring consumers to change their telephone number according to a set migration plan. A code change would involve combining every existing area code currently beginning with the digits 01 with other 01 area codes into much larger geographic areas (i.e., wide areas), and giving this wide area a code beginning with the digits 02 or 03.

We note that Ofcom has a plan for implementing wide area codes in the UK that involves splitting the UK into 15 wide area codes according to regional boundaries, with ten codes for England, three for Scotland and one each for Wales and Northern Ireland.

We understand that the whole of the 029 code has been set aside for Wales, but that only Cardiff required an additional supply of numbers when the 02 codes were initiated in 2000. The remaining codes in Wales were not migrated at that time although under the wide area code plans, there are 029

XX codes set aside for the remainder of Wales if and when required.

We recognise that pursuing this option would have implications for residential consumers and businesses as set out by Ofcom in this consultation, as:

- need for detailed planning
- 10k blocks of numbers tied up
- cost and inconvenience to businesses (particularly small businesses)
- lack of public appetite
- cost and disruption to all stakeholders

We note that the preferred option set out by Ofcom for increasing the supply of geographic numbers is the overlay codes option as this provides an effective means of providing additional number resource in a manner that is targeted at specific areas.

We also note, however, that the migration to 028 for Northern Ireland supports the suggestion made by Ofcom in paragraph A1.76 of this consultation that an area with a strong sense of regional identity, could convey this identity by introducing a wide area code.

We think, therefore, that Ofcom should look more closely at Wales in order to further explore all three options. We believe that the UK-wide market research referred to in the Numbering Review: Report of Market Research Findings document attached to this consultation should be repeated in Wales to enable a detailed analysis of all three options to be carried out from a Welsh perspective. A cost/benefit analysis of these options, within the context of the underlying strategic principles set out above, would enable Ofcom to make a recommendation that best supports the needs of households and businesses in Wales.

Yours sincerely

Richard Sewell
Head of Telecommunications Policy