

Competition Group
Ofcom
Riverside House
2A Southwark Bridge Road
London
SE1 9HA

16th June 2008

Dear Sirs,

I am writing on behalf of Global Radio, in response to your current consultation on extending premium rate services regulation to 087 numbers. Our response is not confidential.

Global Radio is the third largest radio company in the UK. We operate nine analogue radio stations across three brands: Heart, Galaxy and LBC, in what is an increasingly competitive radio market. As well as broadcasting our analogue services on DAB across the country, we are the major shareholder in the MXR regional DAB multiplex network, and also broadcast our services online, via their own radio players, and via digital television. We currently do not operate any 087 numbers; it is possible that we will use such numbers in the future.

Question 1: Do you have any comments about the proposed extension of PRS regulation to 0871, 0872 and 0873 numbers?

We are broadly happy with the proposals set out in the consultation. We agree with Ofcom that 0870 should be excluded from this regulation, as has been set out in the related consultation, 'Changes to 0870'. It is understandable that Ofcom wish to make clear the differences between so-called 'national rate' calls, and calls to 087 numbers, the relative costs of which are often significantly different. Given the variety of alternatives to 0871, 0872 and 0873 numbers, we feel that these changes to that number range are reasonable.

Question 2: Do you have any comments about the PhonepayPlus Statement of Application and Ofcom's comments about the concerns that have been raised by stakeholders?

Using a Statement of Application to apply the Code of Practice appears to us to be an appropriate and easy way to regulate the 087 series of numbers. We agree with the proposals that 087 numbers should not be subject to the stringent rules that apply to controlled premium rate services. As has been recognised, these services carry less risk for the consumer, due in part to

the nature of services that will use this number range, and in part to the lower cost of calling. We are pleased to see that, to reflect the reduction in consumer harm, the obligations for network operators and service providers (due diligence requirements, undue delay restrictions) have also been reduced. The Statement of Application, in our view, provides a good balance between practicality for operators and the protection of consumers.

Question 3: The proposed extension of PRS regulation would mean that service providers offering services on 09 numbers would not be permitted to use 0871, 0872 or 0873 numbers for complaints unless call charges are refunded. Ofcom would welcome stakeholder comments about this secondary impact of the proposal.

As we operate no customer service telephone lines on 087 numbers, nor are we likely to in future, we are not affected by this part of the proposal and offer no opinion.

Question 4: Do you have any comments on the proposed modifications to the PRS Condition?

Making the changes as proposed by Ofcom in the consultation requires a change to be made to the PRS Condition; as we are in support of these changes, we are happy for the PRS Condition to be changed.

Yours faithfully,

Carina Tillson
Regulatory and Public Affairs Executive
Global Radio