

Question 1: Do you agree with our proposal that revenue sharing should no longer be allowed on 0870 calls if the link between 0870 call prices and prices for 01 and 02 geographic calls is restored?

This is a cleverly phrased and loaded question that implies that Ofcom intends to remove revenue sharing on the 0870 range and thus end the 0870 scam. In reality, revenue sharing will continue on this range of numbers as well as on 0844, 0845 and 0871 because an exception will be permitted. The permitted exception (which is totally unacceptable) is that telephone companies choosing not to charge the geographical number rate will merely have to make a call charge announcement at the beginning of the call to inform consumers of the cost and then proceed with the rip-off as before, since consumers who simply have to phone that number have no other choice. The only acceptable solution is for the whole 084 and 087 NTS regime to be removed from the National Telephone Numbering Plan (NTNP). Accepting that this may take up to six months to implement, as an interim measure, geographic replace codes must be made available to overlay 0844, 0845, 0870 and 0871 numbers. There is provision within the NTNP for revenue sharing in the 09X Premium Rate Service (PRS) range, and this is where any such service, currently operating using 084 or 087 belongs. No other country has the equivalent of the UK's crazy and wretched 084 087 scam and the sooner we are rid of it and its effective licence to print money the better. The argument that NTS is needed to avoid overloading of company or government switchboards is rubbish since other countries with far larger telephone networks and companies (notably the US) manage perfectly well without it.

Question 2: In connection with Option B4 and B5, do you agree with Ofcom's initial view that 0870 calls should be removed from the scope of the NTS Condition if the geographical link between 0870 calls and geographical calls is restored?

Pending my (question 1) ideal solution of the complete dismantling of the 0870 number range, then any use of 0870 numbers by companies and government departments should be for the convenience of the number owner only, and not for their financial gain at the expense of the consumer, who currently receives nothing by way of return for the "privilege" of effectively paying extra to phone them.

Question 4: What do you think of our proposal to extend the rules controlling premium-rate services using 09 numbers to include 0871 numbers?

As an interim solution I agree, but ideally as in my question 1 response, 0871 numbers should be removed from the NTNP altogether. 0871 is currently a premium-rate number in all but name and therefore it should sit with all other PRS numbering in the appropriate range, 09X. My additional concern is that if you merely remove the 0870 revenue sharing potential for current owners of those numbers they will simply migrate to 0871 and the whole disgraceful scam will continue on that range.

Question 5: Do you agree we should insist that any adult entertainment services using 08 numbers have to move to the 09 numbers set aside for this type of content?

Yes. Any revenue generating numbers be they adult or anything else should be clearly identifiable by being in their own number range and 09 is a good way of doing this. Having all such numbers within a single and simple range makes it far easier for parents to block such numbers from inappropriate use by children than the current mess does. Additional strengthening of the PRS regulation is needed including the explicit granting of consent, i.e. an 'opt-in', by the bill payer before any PRS service can be accessed from any UK network or provider.

Question 7: Do you agree that the package of measures we propose to introduce will tackle most of the problems with Number Translation Services? If not, what else do you think we could do and why?

No I do not for the reasons above and below. From the many media articles and the popularity of websites such as *saynoto0870.com* it is clear that the public does not want these NTS numbers. Your proposals are merely toothless tinkering at the edges of the problem. What is needed is a root and branch extraction of the NTS rip-off, whereas you are merely wasting money on yet more futile consultation in an attempt to delay the inevitable, which will occur because of growing public anger with NTS as its cancerous growth pervades our networks and ever more people begin to realise why their phone bills are increasing instead of decreasing. Ofcom needs to look and learn from elsewhere, rather than perpetuate the scandal of the uniquely British NTS rip-off. The United States by contrast does not have any equivalent to 084 and 087 NTS whereby public bodies and others are content to make money by letting their callers pay about £6 per hour on hold before they can complain about shoddy service.

Another reason for doing away with NTS is that if one is abroad and needs to contact a UK NTS number in an emergency then one cannot because the foreign phone system will not recognise the number, it takes little imagination to see that this could have serious financial or medical etc consequences.