



Mr Nic Green, OFCOM

by e-mail

14 March 2007

Dear Mr Green

RAISING CONFIDENCE IN TELEPHONE NUMBERS

During 2006 OFCOM consulted on the introduction of a national 03 number range. The stated objective of the proposed number range was to 'increase certainty, trust and confidence in the numbers that consumers use to call public services, not-for-profit organisations and companies who want a national presence'. OFCOM specifically proposed the sub-ranges, 0300, 0303, and 0306, for 'public services and other not-for-profit organisations'.

In his report to the Chancellor on 6th December 2006, Sir David Varney welcomed the concept of the 0300 number range as an opportunity for government to simplify access to public services for citizens and businesses. The Citizen and Business Contact Council ('Contact Council') is tasked with responding on behalf of government to this recommendation. I am writing to you on behalf of the Contact Council.

On 13th February 2007 OFCOM published its implementation plan for the proposed 03 number range and sub-ranges, *Raising confidence in telephone numbers*.

On 20th February 2007 Central Office of Information (COI) wrote to OFCOM stressing the need for greater clarity and consistency around tariffs.

Following a review of the implementation plan the Contact Council has concerns that the current plan would not achieve its primary objective to instil confidence, trust and certainty in telephone numbers. Specifically the plan, if implemented as stated, risks increasing confusion amongst citizens, businesses, public and 3rd sector service providers; offering bad value for money for the taxpayer and allowing further fragmentation of services.

We have the following detailed concerns:

1. We support OFCOM's intention to cap charges to the consumer for 03 calls at the national tariff for 01 and 02 calls, but the current implementation could result in some 03 calls being more expensive to the user. OFCOM rightly disallows revenue sharing on 03 numbers but it does not preclude communications providers from charging public and voluntary service



providers a management fee for the provision of the 03 service. This fee will ultimately be paid out of taxpayers' money, effectively subverting OFCOM's intention to cap. **We would like to see a prohibition on the charging of management fees for this range.**

2. The implementation plan does not require a minimum set of 03 services from communications suppliers before 03 becomes available; nor does it require all suppliers to offer 03 services. This will restrict access to public services for some citizens and businesses. An obvious example would be the lack of access that international callers will have to 03 range once the sub-range products are launched. **We would like a minimum set of service requirements that providers must supply before they are entitled to sell the 030x to clients;**
3. OFCOM's announcement of a dedicated public and voluntary service range before it is fit-for-purpose will mislead public bodies and consumers into thinking that they must use the 03 range. **We would like to see a clear statement from OFCOM and the industry on what this range is, how much its usage costs, which services are included in it and when transition can begin, by departments, to the range;**
4. The 03 range will have limited appeal to users of local tariff numbers, such as Local Government, as pegging the 03 range to 01 and 02 national tariffs will mean a more expensive service for consumers and local public service providers. Calls to local government represent over 50% of all call for public services. **We would like to see a 'not more than' cost set for all calls to 0300, 0303 & 0306 numbers. The cost should not exceed a local tariff;**
5. An intended benefit of 0300, 0303 and 0306 for public services was that departments could occupy entire sub-ranges e.g. HMRC 0300 1000 XXXX, DWP 0300 2000 XXXX and so on. However, in allocating numbers to communications providers in 10K blocks and on a first-come-first-served basis, OFCOM will require departments to apply to several communications providers in order to obtain one contiguous number block. **We would like to see number blocks allocated by government for its sub-ranges. Carriers should 'bid' against these;**
6. The cost of making a call to a public service on 030x will be confusing for citizens and businesses. 03 tariffs are modelled on 01 and 02 call charges where call costs to the consumer depend on the specific tariffs charged by a communications provider to its customer. These charges vary widely in the UK and do not allow public and voluntary service providers to give to citizens and businesses a clear understanding of what they will pay for a specific call. **As above, we would like to see a 'not more than' cost set for all calls to 0300, 0303 & 0306 numbers. The cost should not exceed a local tariff;**
7. OFCOM allocates 0300, 0303 and 0306 specifically for public services and voluntary organisations. The implementation plan should additionally provide clarity on the status of organisations that come under the Utilities Directive. **We would be grateful for further clarification on the use of the allocated sub-ranges;**



8. Some communications providers are already offering 0370 to public sector organisations. As this number is outside of 0300, 0303 and 0306 it is likely to confuse customers when they see it as an access point to a public service. **We would welcome early clarification of the use of 0370 and other non-0300, 0303 and 0306 sub-ranges for public services.**

While the principles of the 03 proposal are generally sound, it is important to ensure that the implementation plan creates a firm foundation for a range that instils certainty, trust and confidence in both consumers and providers of public and voluntary services that use the number range. At present the proposals from providers suggest that the management fee will mean that 03 services will actually cost the taxpayer more than current 0844 services – a credible alternative to 030x which could undermine trust in the 03 range.

With OFCOM's decision to end revenue-share on 0870 on 1st February 2008 departments will be under pressure to move to an alternative and credible number range. If the 03 range issues cannot be resolved in the near term **we would ask OFCOM to revise the 0870 decision to ensure that departments are can prolong their usage of 0870 until a sound alternative is firmly in place.**

On behalf of the Contact Council

Ian Law (Chair)

