

Raising confidence in telephone numbers - response from David Lindsay

Introduction

As a general consumer I welcome the opportunity to give my views on the matters raised in Ofcom's consultation document, *Raising confidence in telephone numbers*. I respond purely as a user of telephone services in the UK.

When I first started to read the document my initial reaction was that it makes no mention of the reforms on the 0870 range. It is my understanding that from 1 February 2008 calls to 0870 numbers will also be charged at geographical rates, and thus from the consumer's perspective, will be identical to 03.

Having read through it, I think it would be a good idea to see what the uptake is like with 03 numbers. It would be much better for SPs to change voluntarily rather removing revenue on 0870, thereby forcing them to either do without the revenue or move to another number range that allows revenue-sharing. It will also mean that there will not be an anomaly of 0870 being charged at geographical rates mixed in with revenue-sharing 08 numbers.

If some large public bodies have expressed an interest in 03 numbers, then hopefully the word will spread consumers and make other organisations that operate on 084 and 087 non-geographical numbers think about changing.

The Importance of 03 being charged at Geographical Rates

The research carried out by Ofcom shows that the potential for some OCPs to opt-out, as it were, and charge above their geographical call rates may be detrimental to 03 numbers' acceptance amongst SPs. This linkage is the unique selling point of this range, and must be upheld for all OCPs without exception.

I am pleased to see that Ofcom will be looking at controlling how OCPs charge for other types of numbers as well. Calls to freephone numbers are generally not free from mobile telephones, and often attract a higher call charge than geographical calls. If this continues to be the case, then there is the potential for calls to freephone numbers to be more expensive than calls to UK-wide Numbers from some mobiles. This is an anomaly which must not be allowed.

In my opinion, UK-wide Numbers should be charged at a provider's local call rate, for those which have differing rates for local and national calls. There are two reasons for this:

- When SPs give a pricing description for their numbers, it would be misleading to describe the calls as being "local rate" or "geographical rate". Therefore they should be labelled as being "national rate", but this has the potential to fuel the misconception that a longer distance call is more expensive, and;
- SPs, including small local companies, such as garages, who adopt these numbers to portray a 'professional' image, will unwittingly force some of their customers to pay more to phone them than if they had called it on its 01 or 02 number. This is another anomaly that should not be allowed.

If UK-wide Numbers were to be charged at local rates, then they could be described as “geographical rate” or “local rate”, terms which (especially the latter) consumers are familiar with. I feel that whilst it may be acceptable to use the term “UK-wide Number rate” on telephone bills, for an SP to put it on its promotional material will leave consumers confused as it does not explain the linkage in rates.

Pre-call Announcements

I am sceptical about Ofcom’s research (discussed in paragraph 3.25) which says that 42 percent of consumers would find routine pre-call announcements annoying. What is the meaning of the word ‘routine’ in this context and did all the people questioned bear this in mind when answering?

I would find it annoying to have pricing messages at the beginning of *all* calls. What I would find useful is the ability to have announcements on those ranges where there is a mixture of different charging rates such as with 0871 and 09. Ideally, it would also be useful to be able to turn these on and off, perhaps by visiting the CP’s website.

If there was an announcement at the start of calls to all 070 numbers, it would only affect one in every 100,000 of all calls made in total. One can hardly regard this as being routine. Indeed, the lack of understanding of potential call cost is probably as a result of the low usage of 070 numbers coupled with the high usage of 07 numbers being perceived as being for mobile phones.

If the pricing announcements prove successful in achieving the goal of creating a clearer picture for consumers, then perhaps Ofcom can consider it as an option for other types of numbers.

The issue raised in paragraph 4.12 about pre-call announcements on 070 numbers being related to the retail price that the network operator charges when a reseller CP is involved are probably relevant to 03 numbers as well. I think that there may be other side effects:

1. It may be against the law. Various trading standards have reported that it is the SP’s responsibility to provide the correct pricing information. They have said that those who provide incorrect information may be misleading within the meaning of Part III of the Consumer Protection Act 1987.
2. Whilst the consultation document explains that all users of the same network will hear the same message, it does not go into whether it will be possible for the it to be played or not depending on whether a particular customer’s telco requires it or not. So if the reseller CP’s rate does not require it and the network operator’s does, will the reseller’s customers hear it? And, vice versa, what happens when the reseller’s is above the threshold and the network operator’s is not?
3. The idea behind pre-call announcements is to provide clearer pricing information than exists without them. Where consumers have a lack of awareness of charges for a type of number and call it regardless, then there is little incentive for telcos to reduce prices. So a reseller CP can set the call rate as high as it wants and the announcement will still give the

network operator's retail rate. Thus, it defeats the object of implementing this feature.

The message will need to be a brief one, so it will be something along the lines of "This call will cost 25 pence per minute if you are with provider x." Alternatively, if no mention of the network operator, provider x, is made, it could be something like "This call will cost around 25 pence per minute, but the exact amount may vary." How can this vagueness and possible inaccuracy be explained to the average consumer?

Customers of a reseller CP will be asking why they hear a pricing announcement from another provider. They will wonder why the rate they are given *may* be wrong. This will cause confusion and customers may feel that they have been misled by their provider, and may choose to leave it as a result.