



**Access codes: options for the future and proposals
to revise access codes and short codes conventions**

Statement issued by the Director General of Telecommunications

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Summary

S.1 Access codes are short, generally memorable three- or four-digit numbers beginning with '1' which allow customers to access a wide range of telephony services. However, given that these numbers only comprise a few digits, the availability of certain types of access codes was in limited supply and, due to increased demand, in danger of exhaustion. As a consequence, Oftel commissioned a Cost Benefit Analysis to help formulate public policy, and published a consultative document, *Access Codes - Options for the Future*, in May 2000.

S.2 There were 19 responses to the consultative document, including responses from network operators, service providers and consumer organisations. There was broad agreement that future allocations should be based on five-digit codes as this appeared to strike the best balance between widening choice for consumers without forcing changes on the industry. However, there was less consensus in relation to broader policy issues, with a wide range of different views being expressed.

S.3 In the light of responses received, Oftel has decided the following:

- all future allocations will be made in five-digit number form. This policy was outlined in Oftel's Numbering Bulletin (published October 2000);
- no redesignation of Type A and C codes at the present time given the move to five-digit codes, and the subsequent increase in the supply of Type B codes. However, the situation will be kept under review in the light of emerging demand, and Oftel may revisit this decision at a later date if demand becomes more certain;
- codes will be allocated on the basis of Company Groups;
- Company Groups will generally only be entitled to two access codes, although requests for additional access codes will be considered by Oftel on a case by case basis;
- operators with existing codes will not normally be allocated new codes, and shall be expected to extend existing codes;
- existing codes will only be withdrawn when not used;
- industry, in consultation with users, should consider the development of a common approach in certain areas, such as in relation to greater harmonisation of Type C codes for common services.

S.4 Oftel has given careful consideration to longer-term policy issues, such as the approach to code classification, but, on the evidence received during the consultation, has not been persuaded to take any further action at the present time.

S.5 Oftel is currently consulting on revisions to the Numbering Conventions as part of a separate consultation exercise (see the consultative document, *Revising the National Numbering Conventions*, published in February 2001). Annex A to this Statement outlines the revised text to replace the current section in the Numbering Conventions addressing access codes and short codes. Oftel seeks the views of customers, consumer groups, operators and

other interested parties on the proposed text at Annex A. Details of how to comment are outlined in Chapter 4.

S.6 It should be noted that this document does not address the specific issue of the use of short access codes for the provision of directory information and services. This matter is being considered as part of a separate Oftel consultation (see the consultative document, *Access Codes for Directory Enquiry Services*, published in November 2000).

Chapter 1

Introduction

Background

1.1 Access codes are short, generally memorable three- or four-digit numbers beginning with '1' which allow customers to access a wide range of telephony services. Examples include access code '100' to contact the Assistance Operator and access code '1471' to find out the telephone number of the last person who called you. Most telephone companies use access codes.

1.2 The current use of access codes dates back to when BT, as a monopoly, used such codes as a quick and convenient method to offer their customers access to a range of services (such as code '100' for the Assistance Operator). Over the years, BT increased its use of access codes, and additional numbers for further services were utilised (such as the codes '150' to '154' for customer services and fault reporting).

1.3 With the ending of the monopoly when Mercury was licensed to provide telecoms services, BT allocated codes to Mercury, such as '131' and '132'. These were used to give BT customers access to the Mercury network – known as 'Indirect Access' (see Glossary). The practice of allocating codes for Indirect Access was extended following the ending of the duopoly in 1991, and has been continued by Oftel since taking over responsibility for the management of the national Specified Numbering Scheme (see Glossary) from BT in 1994. There are now approximately some 200 Indirect Access operators.

Types of access codes

1.4 Access codes are categorised by the type of service for which they are used. There are three types of access codes: Types A, B and C access codes. The following definitions are based on proposed revisions to the current definitions of access codes (as outlined in Convention B11 of the second issue of the Numbering Conventions) for incorporation in the third issue of the Numbering Conventions when published later in 2001.

- Type A access codes are used by callers to reach commonly used services, such as '100' (operator services) or '123' (speaking clock). These codes may be used throughout the United Kingdom by all operators offering equivalent services (and may not be used by any operator for any other service). More recently, the use of Type A codes has been refined for particular services where there is a social imperative, sometimes backed up by regulatory force, such as '141' (suppress Calling-Line Identity (see Glossary)) and '1800X' (voice text services for the deaf). Type A codes are allocated by Oftel.
- Type B access codes have network-wide significance as they are used by the customers of one public telecommunications operator (PTO) to have selected calls connected by an operator other than the one from whom they rent their telephone line (known as 'Indirect Access'). For example, callers might use Type B codes to select Indirect Access providers for long distance and/or international calls. Type B codes can also be used by callers to access content services and facilities available outside their operator's system. These codes are allocated by Oftel.

- Type C access codes are set aside for independent use by PTOs, either to provide particular services exclusively to their directly connected customers, or for internal network operations. The access code '150', which is used by BT for residential sales and billing enquiries, and Orange for customer services, falls into this category. Operators of different systems have the opportunity to choose corresponding codes where it is convenient and potentially beneficial to adopt a common approach, but are not obliged to do so. While Oftel has designated a range, it does not allocate Type C codes but, based on information supplied by operators, their use is recorded in the Numbering Scheme.

The problem

1.5 Given that access codes were only three- or four-digits long, and the sudden growth of new telephony services in the UK market over the last few years, the availability of Type B codes was in limited supply, and in danger of exhaustion.

1.6 The following developments, in particular, significantly impacted (or have the potential to significantly impact) upon the availability of Type B access codes, resulting in increasing pressure on the access codes resource:

- changes to the allocation policy (in order to conform to recent EC requirements), with those companies operating under an individually registerable or class licence with a Numbering Arrangements Condition, and who operate a telecommunications system, now being entitled to access code allocations;
- the introduction of Indirect Access on mobile networks, with Vodafone and BT Cellnet now being required to implement Indirect Access using Type B codes;
- the development of new innovative technologies and services, with increasing customer demand for these services (particularly in the mobile market) attracting increasing numbers of service providers.

1.7 This Statement outlines the action Oftel has taken, and intends to take, in order to address the shortage of Type B access codes in the light of representations received to the public consultation. In addition, Oftel has taken advantage of the opportunity afforded by this exercise to refine policy on further issues, including entitlement to allocation and maximum permissible holdings.

Chapter 2

Responses to public consultation

2.1 There were 19 responses to the consultative document, including responses from network operators, service providers and consumer organisations.

2.2 There was broad agreement that future allocations should be based on five-digit codes as this appeared to markedly expand the supply of codes, so widening choice for consumers without forcing changes on the industry given that existing codes would not change. However, there was less consensus in relation to other issues, with a wide range of different views being expressed.

2.3 The consultative document invited comments on certain specific questions. These were:

Question 1: Do you agree with Oftel's view that Option 1 from the Costs Benefit Analysis [redesignating code types] should be implemented? If so, do you consider that Option 1 should be implemented all in one go, or is there merit in using a phased approach, as outlined in the consultative document?

2.4 There was broad support that Oftel's proposal that future allocations should be made on the basis of five-digit codes offered the least cost option for increasing the supply of access codes. In particular, it was agreed that this option had the advantage of minimising disruption to the industry and consumers, while not reducing competition and innovation. Some respondents expressed concern about the proposed lengthening of codes given the difficulties that may be experienced by users, although agreed that the reasoning behind such an action was sound.

2.5 The proposal to adopt a phased approach, with only certain unused Type A access codes being initially redesignated, drew broad support on the grounds that phasing would be important in limiting any potential impact upon existing services. However, concern was expressed that the shortage of access codes outlined in the consultative document may be overstated, given that certain Type B access codes which had been allocated, had not yet been implemented in networks. As a consequence, it was argued that these codes should be withdrawn and re-issued as five-digit codes, and that this would obviate the need to redesignate the proposed Type A range ('101' to '109') at the present time.

Question 2: Should future Type B access code allocations be made on the basis of either Company Group or licence?

2.6 The majority of respondents argued that future allocations should be made on the basis of Company Groups (see Glossary) as this offered the best method of monitoring the access codes resource. However, it was argued that there should be opportunities for innovation which may result in legitimate flexing of any basic allocations rules in this area.

Question 3: In the light of Oftel's statutory responsibility to ensure numbering capacity, what should be done to prevent the exhaustion of Type B codes in the event of Type B code allocations being made on an unrestricted basis?

2.7 There was general agreement that access codes should not be allocated on an unrestricted basis, and that a sensible balance could be arrived at through efficient use of the Numbering Scheme on the basis of demonstrable need, consumer focussed criteria, and principles agreed in the Numbering Conventions.

Question 4: If Type B access code allocations were made on a Company Group or licence basis, should the maximum holding be limited to one single-stage call set-up plus one two-stage call set-up code per applicant?

2.8 While there was broad agreement that access codes should not be allocated on an unrestricted basis, there was no clear consensus on what the maximum number of access codes should be. There was only agreement that there should be clearly defined criteria for those requiring additional access codes.

Question 5: If question 4 is answered in the affirmative, should these rules be applied to existing Type B allocations, and should holdings over any specified amount be withdrawn, or should operators be restricted to their current allocation?

2.9 There was limited support for any ruling to be applied retrospectively to existing access codes, with the view expressed that existing codes should only be withdrawn on the grounds of significant under-utilisation or non-utilisation. One proposed solution was that those operators with existing codes should not generally be allocated new codes.

Question 6: If question 5 is answered in the negative, what should be the maximum permitted holding of each sort and what should be the criteria for allocation?

2.10 See the response to Question 4 at paragraph 2.8 above.

Question 7: Is the current classification of Type A codes satisfactory?

2.11 There was broad agreement that the current classification of Type A codes was satisfactory, although a number of respondents argued that the overall approach to code classification could appropriately be the subject of a full review by Oftel.

Question 8: Do you agree that demand for Type A codes is unlikely to increase significantly in the future? If not, what other social codes should we consider making Type A?

2.12 There was overall agreement with Oftel's view that future demand for these codes appeared to be relatively limited. However, the view was put forward that there would be merit in considering whether some services currently provided by using Type C codes should be redesignated as Type A codes in order for certain common services to be harmonised across the industry; for example, all voicemail services being placed behind '117XX'.

Question 9: What are your views in relation to future demand for Type B codes. Do you agree with Oftel's assessment that future demand for these codes may be driven by content services and facilities?

2.13 It was agreed that there was difficulty in judging future demand for Type B codes, especially as the impact of future developments on the access code resource was uncertain.

Indeed, some respondents argued that there was no certainty that there would be increased demand for Type B codes in the future. There was also a divergence of views as to whether content services and facilities represented an appropriate use of Type B codes.

Question 10: Do you think that BT and Cable & Wireless should continue to hold three-digit codes (like '144' and '131')? If not, should some or all of them be withdrawn and what should be the criteria for withdrawal?

2.14 There was broad agreement that existing codes should not be withdrawn given that the withdrawal of familiar numbers would be inconvenient for consumers. It was argued that access codes should only be withdrawn in the case of not being activated or being significantly under-utilised.

Question 11: If you do consider that allocation of Type B access codes should be on the basis of company size, level of services or other similar parameter, how could this be managed?

2.15 As already discussed, while the majority of respondents argued that future allocations should be made on the basis of Company Groups, it was argued that there should be opportunities for innovation which may result in legitimate flexing of any basic allocations rules in this area.

Question 12: What are your views in relation to future demand for Type C codes?

2.16 The responses to the consultation were generally supportive of Oftel's proposal not to withdraw Type C access codes at the present time. In particular, it was argued that the pace of innovation within the developing mobile market, and the development of new products and services, was likely to result in increased demand for Type C codes in the future. However, there was broad agreement that there was currently good availability of these codes – with different operators using identical codes and able to lengthen them, and that there was therefore no requirement at this stage to consider increasing the supply of Type C codes.

2.17 It was also anticipated that future demand for short codes (i.e. the '2XX' to '9XX' dialling space) for operator specific services would continue to grow across the industry as operators seek to innovate in their service offerings through the use of short memorable codes.

2.18 In addition, there was broad agreement that existing access (and short) codes used for common services should be harmonised across the industry. It was argued that Oftel should encourage operators and service providers to collaborate in agreeing the widest range of common services that can be placed behind specific code ranges or identical codes.

Chapter 3

Analysis and conclusions

Addressing the shortage of Type B codes

3.1 The responses to the consultation have confirmed Oftel's view that future allocations should be made on the basis of five-digit codes. In the light of strong support for such an action, and the imminent exhaustion of Type B access codes, Oftel proceeded with the implementation of five-digit codes with immediate effect (see Oftel's Numbering Bulletin, published in October 2000). Given that no existing codes would be changed, there would be minimal impact upon consumers and industry. Moreover, this proposal would benefit consumers by facilitating increased competition.

3.2 Oftel has given careful consideration to the view that the proposed redesignation of Type A access codes ('101' to '109') may no longer be necessary. Oftel investigates the status of numbering capacity as part of its annual audit, and any capacity which has not been brought into service is generally withdrawn. In the light of discussions with operators, Oftel has successfully withdrawn a number of four-digit access codes, and these will be re-issued as five-digit codes. As a consequence of this withdrawal, together with the move to five-digit codes, Oftel concurs that the argument for redesignating Type A codes has diminished. Accordingly, on balance, Oftel recommends that the range '101' to '109' should not be redesignated as Type B codes at present, but retain their Type A 'reserved' status. However, the situation will remain under review, and Oftel may revisit this decision at a later date, if demand becomes more certain.

3.3 Similarly, in the light of the increased supply of Type B codes, and broad agreement from respondents during the consultation exercise, Oftel has decided that there should be no changes to Type C access codes at present.

Entitlement to allocation and maximum permissible holdings

3.4 The responses to the consultation have confirmed Oftel's view that Type B access codes should not be allocated on an unrestricted basis in the future. Oftel concurs with the view that a sensible balance must be maintained through the efficient use of the numbering capacity on the basis of demonstrable need, consumer-focussed criteria and principles agreed in the Numbering Conventions.

3.5 In the light of representations received, Oftel has decided that entitlement to allocations should be on the basis of Company Groups, with entitlement generally being restricted to two codes per Company Group – one for single-stage call set-up plus one for two-stage call set-up. Oftel is of the view that basing entitlement on Company Groups is a more equitable way of allocating numbering capacity than licences; basing allocation entitlement on licenses would enable companies to increase their holdings of Type B codes by obtaining allocations for each of their licences under which they operate.

3.6 However, Oftel concurs with the view that a balance has to be achieved between the efficient use of numbering capacity and a degree of flexibility to enable opportunities for innovation to exist. Accordingly, while those operators who already have existing codes will

not generally be allocated new codes (given that existing codes may be extended), requests for future allocations will be considered by Oftel on a case by case basis.

Long-term strategy for access codes

3.7 A number of the responses to the consultation referred to the benefit of developing a longer-term strategy for access codes in the light of the rapid development of the telecommunications sector and, in particular, the development of innovative technologies and services. It was argued that the telephone (especially mobile) was increasingly becoming a source for information rather than just voice communication, and that this was having a significant impact upon access code usage. As a consequence, it was further argued that the overall approach to code classification was no longer appropriate, and should be the subject of a more comprehensive review.

3.8 However, of those respondents that argued for more strategic focus, there was a divergence of views in relation to preferred outcomes. The different proposals made during the consultation in the context of longer-term strategy are summarised in Figure 1.

3.9 Oftel has given careful consideration to the view that there may be benefit in considering the current access code regime in the light of developing a longer term-strategy. However, on balance, Oftel has not been persuaded that a genuine need for a departure from the current arrangements has been identified, particularly given the general agreement of the requirement to maintain continuity in several key areas, and the potential inconvenience to consumers and industry. Nor, on the evidence provided, has the case been demonstrated that changes to the current regime would necessarily command widespread support. Moreover, the responses to the consultation have confirmed Oftel's view that future demand for access codes is difficult to judge, especially given that the impact of future developments, such as Carrier Pre-Selection (see Glossary), on the access codes resource is highly uncertain. For these reasons, Oftel does not consider that a comprehensive review would be appropriate at the present time.

3.10 However, there is an opportunity for industry to address particular concerns raised, in consultation with users, within the current framework, and without regulatory intervention. This would be consistent with Oftel's strategy of moving towards co- and self-regulation, where appropriate. For instance, two areas where a strategy of self-regulation may be adopted are:

- in relation to the development of either carrier-led or service-led codes, using access codes already allocated. This would require industry to develop a common approach to the use of such codes, with all codes being available across all networks; and
- in relation to greater harmonisation of Type C access codes for common services. As above, this would require the development of a common approach in order for common services to be placed behind specific code ranges.

3.11 Oftel is prepared to facilitate discussions on these issues if there is sufficient industry interest.

Figure 1: Longer-term policy issues

<p>BT</p>	<p>Would like to see a carrier-led approach to increasing the number of access codes, with all carriers making all codes available on request. Carriers would have the option of requesting access to their codes from other carriers, thus allowing customers to have access to carrier-specific services. This would allow consumers to select the provider of the service of their choice wherever they are.</p> <p>Also proposes that rather than continue with Type A, B and C codes, there would be just two categories – carrier codes and service codes. These would be used either by dialling a carrier code prior to a service code or just dialling a service code for those served directly by that carrier. By prefixing such a service code with a carrier code, consumers could have the choice of accessing different carriers’ service variants independently of where they were located, and which carrier they were using for access.</p> <p>Proposes that some service codes would continue to be industry-wide codes.</p>
<p>Cable & Wireless</p>	<p>Agrees that it is important to have in place a long-term transparent policy for access codes, and it would therefore be prudent to carry out a wholesale review.</p>
<p>Centrica</p>	<p>Argues that the current regime favours network operators. Would wish to see the current three categories of access codes reduced to two, with the first type being the equivalent of Type A codes (i.e. industry wide), and the second type being the equivalent of Type B and C codes (i.e. for indirect access/content services and facilities, etc). Argues detailed guidelines would need to be established for identifying codes types and specific usage categories.</p>
<p>Federation of the Electronics Industry</p>	<p>Argues that the identification of those services for which it is appropriate to invoke the use of a short service code and those for which a freephone number may be more appropriate needs to be considered as part of a long term strategy.</p>
<p>Operators Group</p>	<p>Broadly questions whether the concept of ‘types’ remains relevant in today’s market as when these codes were originally introduced. However, argues that well-established codes used for services with a significant customer base should not be subject to disruptive regulatory change.</p> <p>Also argues that the analysis should have considered in more detail the evolution in routing, naming and addressing.</p>
<p>Orange</p>	<p>Argues that consideration should have been given to the potential impact of the technological enhancement of fixed wire networks’ routing functionality as well as the evolution in naming and addressing standards in respect of access codes and short codes.</p>

Use of Type A codes

3.12 The responses to the consultation have confirmed Oftel's view that the current classification of Type A access codes is largely satisfactory and that, irrespective of the regime, there will always be a consumer requirement for certain service codes to be consistent across the industry.

3.13 In the light of representations received, Oftel does not propose any revisions to the current Type A access codes resource. While Oftel has considered the view that there may be merit in redesignating certain services currently provided using Type C codes as Type A codes, Oftel has not been persuaded that this would represent an appropriate use of Type A codes. In Oftel's view, and outlined in the proposed revised Numbering Conventions text (see Annex A), Type A codes should only embrace those services where there is an overriding, social imperative for a common code to be used throughout the UK. Recent examples of such codes include '141' (suppress Calling-Line Identity) and '1800X' (voice text services for the deaf).

3.14 In Oftel's view, the argument for the redesignation of Type C access codes is on the grounds of minimising the potential for consumer confusion rather than any overriding, social benefit. For this reason, Oftel considers that the case for greater harmonisation of Type C codes would be better addressed within the current framework of Type C codes, through the development of a common industry approach. This is discussed in more detail in the section dealing with the use of Type C codes (see paragraphs 3.18 to 3.20 below).

Use of Type B codes

3.15 The responses to the consultation have confirmed Oftel's view that future demand for Type B access codes is difficult to judge especially given that the impact of future developments on the access codes resource is highly uncertain.

3.16 Oftel has given consideration to the view that content services and facilities are not an appropriate use for Type B codes given that they do not conform with the definition for Type B codes, as outlined in the second issue of the Numbering Conventions. However, while such services are distinct from 'traditional' Indirect Access, offering content services or facilities rather than call conveyance, in Oftel's view, they represent a form of Indirect Access insofar as they enable customers of one public network to choose services outside that operators system.

3.17 In the light of the strong support for no changes to be made to existing codes already in use, regardless of the number of digits, Oftel has decided that there should be no withdrawal of codes already in use. In particular, Oftel shares the view that the withdrawal of familiar numbers would be inconvenient for consumers. Accordingly, normal rules on the withdrawal of non-activated codes will continue to apply; operators and service providers can retain their current allocations of access codes, provided that their use is in compliance with the Numbering Conventions.

Use of Type C codes

3.18 The responses to the consultation were generally supportive of Oftel's proposal not to make changes to Type C codes at the present time, and Oftel therefore confirms this view.

3.19 Oftel supports the case for greater harmonisation of Type C codes for common services, particularly given the potential that consumer confusion could increase as operators and service providers increasingly use the same code for different services. While there would be a cost involved in changing codes, Oftel considers that greater consistency within the Numbering Scheme would result in easier access to services, and provide medium to long-term benefits to both users and operators.

3.20 However, as already indicated, this is not an area in which Oftel considers that regulatory intervention is necessary nor desirable, particularly given that Oftel does not currently regulate the allocation of Type C codes. Accordingly, in Oftel's view, this would appear to offer an appropriate opportunity for industry to demonstrate self-regulation working in practice, and Oftel would welcome the development of a common approach in this area, and is happy to facilitate discussions to this end.

Use of short codes

3.21 Oftel has also given careful consideration in relation to the use of short codes (ie the '2XX' to '9XX' dialling space). Oftel has not designated these codes for public use, except in the case of '999'. However, despite this, as outlined in Oftel's consultative document, Oftel is aware that certain operators use such short codes as a means of providing customers with access to certain services and facilities, on networks where only full dialling is possible.

3.22 In the light of the responses received, Oftel has no plans to formally authorise the use of short codes as part of the Numbering Conventions. Accordingly, operators who continue to make use of short codes should be aware that there may be implications in the event of changes being made to the structure of the Numbering Scheme.

Chapter 4

How to comment

4.1 Oftel seeks the view of customers, consumer groups, operators and other interested parties on the proposed text for incorporation within the revised Numbering Conventions, by 22 May 2001. A further two weeks will be allowed to submit comments on comments.

4.2 Views and comments should be made in writing to:

Josephine Ibegbuna
Conventions Consultation
Numbering Unit
Oftel
50 Ludgate Hill
London, EC4M 7JJ

Fax: (020) 7634 8784

E-mail: josephine.ibegbuna@oftel.gov.uk

Internet Access

4.3 Oftel has a free e-mail based mailing list to help people stay informed about its work. Each time an Oftel document is published and placed on Oftel's website, subscribers to the list receive an e-mail informing them of the document. To register for this service you should visit the 'What's New' page on the Oftel website (www.oftel.gov.uk/new.htm).

Confidential Responses

4.4 Confidential responses should not be sent via the internet. Written comments will be made publicly available in Oftel's Research and Intelligence Unit, except where a respondent indicates that a response, or part of it, is confidential. Respondents are therefore asked to separate any confidential material into a *clearly marked annex*. In the interests of transparency, respondents are asked to avoid confidential markings wherever possible.

Viewing comments made

4.5 Appointments to view written comments in Oftel's Research and Intelligence Unit, which must be made in advance, can be arranged by ringing: 020 7634 8761 (fax: 020 7634 8946). If respondents would like to discuss the contents of the Statement please contact Gavin Daykin on 020 7634 5338.

Other formats

4.6 Copies of the Statement are available on disk. The summary can be made available in large print, braille and tape formats. Please contact the Oftel Research and Intelligence Unit on 020 7634 8761 for more information. Numbering information also appears on Oftel's web site, www.oftel.gov.uk.

Next steps

4.7 Following completion of the consultation exercise, Oftel will publish a third issue of the Numbering Conventions that takes into account the views of respondents later this year.

The consultation criteria

4.8 Oftel considers that this document meets the Cabinet Office code of practice on written consultation documents. The code is reproduced below for convenience. If you have any comments or complaints about this consultation *process* please contact:

Oftel Co-ordinator for the code of practice:

Robert Jex

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50 Ludgate Hill

London, EC4M 7JJ

e-mail: rob.jex@oftel.gov.uk

Tel: 020 7634 5350

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4.9 Timing of consultation should be built into the planning process for a policy (including legislation) or service from the start, so that it has the best prospect of improving the proposals concerned, and so that sufficient time is left for it at each stage.

4.10 It should be clear who is being consulted, about what questions, in what timescale and for what purpose.

4.11 A consultation document should be as simple and concise as possible. It should include a summary, in two main pages at most, of the main questions it seeks views on. It should make it as easy as possible for readers to respond, make contact or complain.

4.12 Documents should be made widely available, with the fullest use of electronic means (though not to the exclusion of others), and effectively drawn to the attention of all interested groups and individuals.

4.13 Sufficient time should be allowed for considered responses from all groups with an interest. Twelve weeks should be the standard minimum period for consultation.

4.14 Responses should be carefully and open-mindedly analysed, and the results made widely available, with an account of the views expressed, and reasons for decisions finally taken.

4.15 Departments should monitor and evaluate consultations, designating a consultation co-ordinator who will ensure that all the lessons are disseminated.

Annex A

Revised Numbering Conventions text

The following text will replace Convention B11 (Access Codes and Short Codes) of the current second issue of the Numbering Conventions (April 1997). However, as Oftel is currently consulting on revisions to the second issue of the Numbering Conventions (see consultative document, *Revising the National Numbering Conventions*, published in February 2001), Oftel intends to insert the following text as new Convention A11 in the third issue of the Numbering Conventions, when published later in 2001.

It should be noted that references to certain Conventions (such as Conventions 6, A2.4 and A2.7) in the text outlined below refer to the proposed new Conventions to the above-mentioned consultative document.

In addition to the text outlined below, Oftel proposes to insert the following terms to the Glossary of the third issue of the Numbering Conventions, since proposed Convention A11 below refers to these terms and therefore require clarification:

Calling-Line Identity – a facility that enables identification of the number from which a call is being made.

Company Group(s) – this term has the same meaning as the term “group” as outlined in Section 262(1) of the Companies Act 1985, namely it means a parent undertaking and its subsidiary undertakings (both of which are defined in Section 258 of the Companies Act 1985).

Details of how to comment are outlined in Chapter 4.

A11: ACCESS CODES AND SHORT CODES

A11.1 Access codes are short, generally memorable, three- to five-digit numbers beginning with ‘1’ which allow customers to access a wide range of telephony services. Lists of codes in use or designated for use is included in the access codes sections of the Scheme.

A11.2 Access codes are categorised by the type of service for which they are used. There are three types of access codes: Types A, B and C access codes.

Type A access codes

- (i) Type A access codes are used by callers to reach commonly used services, such as ‘100’ (operator services) or ‘123’ (speaking clock). These codes may be used throughout the United Kingdom by all operators offering equivalent services (and may not be used by any operator for any other service). More recently, the use of Type A codes has been refined for particular services where there is a social imperative, sometimes backed up by regulatory force, such as ‘141’ (suppress Calling-Line Identity) and ‘1800X’ (voice text services for the deaf). It is on this latter basis that Oftel intends to consider future allocations of Type A codes. Type A codes are allocated by Oftel.

Type B access codes

- (ii) Type B access codes have network-wide significance as they are used by the customers of one public telecommunications operator to have selected calls connected by an operator other than the one from whom they rent their telephone line (known as 'Indirect Access'). For example, callers might use Type B codes to select Indirect Access providers for long distance and/or international calls. Type B codes can also be used by callers to access content services and facilities available outside their operator's system. These codes are allocated by Oftel.

Type C access codes

- (iii) Type C access codes are set aside for independent use by public telecommunications operators, either to provide particular services exclusively to their directly connected customers or for internal network operations. The access code '150', which is used by British Telecommunications plc for residential sales and billing enquiries, and by Orange Personal Communications Limited for customer services, falls into this category. Operators of different systems have the opportunity to choose corresponding codes where it is convenient and potentially beneficial to adopt a common approach, but are not obliged to do so. While Oftel has designated a range, it does not allocate Type C codes but, based on information supplied by operators, their use is recorded in the Scheme.

Number of digits in access codes

A11.3 Given the need to ensure reasonable numbering capacity, allocation of access codes will be on the basis of five-digit '1XXXX' codes. While three- and four-digit codes will no longer be issued, three- and four-digit codes already in use will remain in use. Access codes will, however, be withdrawn in accordance with Convention 6.

A11.4 Where appropriate, different access codes may be linked together such as, for example, to allow choice of operator followed by access to a second operator's service. However, there may be limitations on the number of digits that the public system can handle in a single string (see Convention A2.4).

Entitlement to allocation and maximum permissible holdings

A11.5 Type B access codes will be allocated on the basis of Company Groups, with the entitlement generally being restricted to two access codes per Company Group. Oftel will consider requests for additional access codes on a case by case basis. However, those who already have shorter-length access codes shall not generally be allocated new codes, and will be expected to extend their existing access codes.

A11.6 The digits of access codes may be used for the purpose of single-stage call set-up, where the dialled digits of the access code and the following number are treated as a single unit or 'string', by the telephone networks in setting up the call. Calls to emergency services ('112') and operator assistance ('100') provide typical examples.

A11.7 The digits of access codes may be used for the purpose of two-stage call set-up, where the dialled digits are treated as two distinct strings by the networks; those in the access

code as one string and those in the ensuing dialled destination number as another. The access code is used by the host network to identify choice of service or routing in a single-stage call set-up process in which all digits may be passed to the accessed network, along with Calling-Line Identity.

A11.8 The digits of access codes may be used in the first stage of a two-stage call set-up process in which the second stage relies on the speech path to convey a Personal Identification Number ('PIN'), if required, and digits identifying the required destination.

Emergency numbers

A11.9 In order to minimise the risk of misdialling or incorrect routing on emergency calls, the use of digits '999' and '112' in prominent positions in longer number strings should be avoided.

Short codes

A11.10 As outlined in Convention A2.7, digits other than '0' and '1' may be designated by Oftel for public use (such as in the case of '999'), but may not be used for other purposes. However, Oftel is aware that certain operators use the '2XX' to '9XX' dialling space as a means of providing customers with access to certain services and facilities, on networks where only full national dialling is possible.

A11.11 Oftel has no current plans to formally authorise this use of such short codes. Accordingly, operators who continue to utilise such codes should be aware that there may be implications in the event of changes being made to the structure of the Scheme.

A11.12 The use of short codes represent substantial numbering capacity and, for this reason, are recorded in the details of the Scheme, where information is provided.

Glossary

Access Codes – short dialled numbers beginning with the dialled digit ‘1’.

Calling-Line Identity – a facility that enables identification of the number from which a call is being made.

Carrier Pre-Selection – the facility offered to customers which allows them to opt for certain defined classes of call to be carried by an operator selected in advance (and having a contract with the customer), without having to dial a routing prefix or follow any other different procedure to invoke such routing.

Class Licence – a licence granted by the Secretary of State to a class of people which permits any within the relevant class to provide specified services without the need for an individual licence or, in certain circumstances, the need to register the system or provide the service.

Cost Benefit Analysis – the analysis and comparative assessment of the relative costs and benefits of a particular course of action.

Company Group – this term has the same meaning as the term “group” in Section 262(1) of the Companies Act 1985, namely it means a parent undertaking and its subsidiary undertakings (both of which are defined in Section 258 of the Companies Act 1985).

Indirect Access – where a customer’s call is routed and billed through operator A’s network even though the call originated from the network of operator B. It is the generic term for both easy access and equal access.

Numbering Arrangements Condition - the condition contained in certain licences granted under Section 7 of the Telecommunications Act 1984. This deals with numbering arrangements in respect of numbers commonly referred to as ‘public numbers’, such as a licensee’s obligation to adopt a Numbering Plan for such numbers allocated to him by the Director General of Telecommunications from the Specified Numbering Scheme in accordance with the Conventions. This is currently Condition 26 of PTO licences, and Condition 22 of the Telecommunications Services Class Licence (‘TSL’) and equivalents in other licences. It is a breach of the Numbering Arrangements Condition, in the licence granted to an operator under Section 7 of the Telecommunications Act 1984, for an operator to not have a Numbering Plan, or to have a Numbering Plan that does not accord with these Conventions.

Numbering Plans- these are the plans that licensed operators shall adopt for such numbers as are allocated to them from the Scheme. These plans describe the method adopted, or to be adopted, for allocating and reallocating a number to any network termination point, user, telecommunication apparatus or service element. The Numbering Arrangements Condition in the licence granted under Section 7 of the Telecommunications Act 1984 obliges a licensee to have a numbering plan that is consistent with the Conventions. Pursuant to that condition, the Director may request such information about the licensee’s operations under its numbering plan as he may reasonably require to administer the Scheme.

Numbering Conventions – a set of rules and principles that govern the use, management, and allocation of Numbers from the Numbering Scheme. It is a breach of the Numbering

Arrangements Condition, in the licence granted to an operator under section 7 of the Telecommunications Act 1984, for an operator to not have a Numbering Plan, or to have a Numbering Plan that does not accord with these Conventions.

Numbering Scheme (also termed the UK Numbering Scheme, the Specified Numbering Scheme and the National Numbering Scheme) – a scheme for the allocation and re-allocation of numbers which is specified by the Director General and described in a list made available by him for public inspection. The list is published monthly on OfTel's Internet pages - <http://www.oftel.gov.uk>

Operator/ Network Operator - an organisation, generally with its own network, entitled to obtain allocation of numbering capacity from OfTel. The relevant criteria are identified in the Numbering Conventions.

PTO - Public Telecommunications Operator - network operators providing services to the public with powers granted by the Secretary of State for Trade and Industry under the Telecommunications Act 1984 to enable them to install their systems on public and private land, property etc.

Service Provider – provider of telecommunication services, or services with a telecommunication service component, to third parties whether over its own network or otherwise.