



GEOGRAPHIC TELEPHONE NUMBERS
CONSULTATION RESPONSE TO OFCOM

February 2011

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1 INTRODUCTION

Colt understands that geographic numbers are becoming scarce in certain areas of the UK and welcomes Ofcom's initiative to address the issue.

In the consultation Ofcom have made several proposals not all of which Colt agrees with. Colt believes that the options should be implemented in order of their simplicity and effectiveness:

- Remove **Local Dialling** in protected areas to release further number ranges
- Strengthen Ofcom's **Administrative Procedures** and reclaim allocated number blocks that remain unused.
- Introduce **Overlay Codes** as a last resort where number blocks are predicted to become exhausted

Colt does not support the use of **Blocks of 100 Numbers** or **Charging** for numbers.

2 LOCAL DIALLING

Colt supports the proposal to remove local dialling in areas where new numbers are in short supply.

Colt urges Ofcom to adopt the removal of local dialling as its first priority since it will provide the greatest alleviation of the shortage of numbers in relation to the effort required in its implementation.

Business users rarely use local dialling and it is not always compatible with PABXs, VoIP servers and other systems which operate the customer's own internal dial plan.

Local dialling no longer holds the importance that it did before the UK PSTN became wholly electronic and when charging was based on monetary units. Prior to this, it was necessary to dial the 'local' number in order to be charged at the local rate; dialling the same number with the trunk prefix would result in the customer being charged at the 'long distance' (national) rate. With the introduction of per second and itemised billing such restrictions no longer apply and there is no longer any incentive or imperative for callers to distinguish between local and trunk dialling.

Indeed, Colt believes that local dialling is now becoming increasingly less important to callers. This is especially true of the 'mobile' younger generation who store and dial numbers in full in their address books.

Colt notes that paragraph B3.1.3 of the National Telephone Numbering Plan will need to be altered to remove the obligation on CPs to provide local dialling. Colt would prefer to see this obligation removed for all area codes and not just the protected areas.

3 ADMINISTRATIVE PROCEDURES

Ofcom state that they will tighten their administrative procedures in relation to the allocation of telephone numbers.

Colt supports Ofcom's proposal to tighten its administrative procedures. However, Ofcom should go further, and actively reclaim unused number blocks from CPs in the restricted areas.

Ofcom state that geographic numbers are allocated to around 300 CPs. However, there are far fewer CPs (around 50) who are actively using geographic numbers in any significant quantities and this strongly suggests that there are many allocated number ranges that are not being used.

Ofcom should therefore use its powers under the Communications Act to enquire of CPs with allocated number ranges in restricted areas how the numbers are currently used.

- First any number ranges that have been allocated more than six months previously but not adopted should be reclaimed under General Condition 17.11.
- Second, where there are 1k number ranges within 10k number blocks allocated in restricted areas, Ofcom should prevail upon CPs to return the unused number ranges. (Ofcom refer to this procedure in paragraph 3.53 and 3.54 of the consultation)

4 OVERLAY CODES

The creation of overlay codes should be Ofcom's last priority in addressing the problem of number shortages.

Overlay codes will immediately double the quantity of numbers available for protected areas, but the code itself will be unfamiliar to end users. Ofcom's research shows that consumers and businesses value the geographical significance of 01 and 02 codes but clearly newly created codes will not carry any significance.

Colt therefore favours an approach where new overlay codes are created and made available in advance of when their future need is identified. In the interim period this will give CPs a choice of whether to apply for 10k blocks of the new number range or smaller allocations from the existing number range.

5 BLOCKS OF 100 NUMBERS

Colt does not support Ofcom's proposal to issue number blocks of 100 numbers.

TDM networks route calls based on routing tables located in each switch. These tables are already large in order to cope with routing to multiple CP networks, and each of the 613 area codes is split into 10k number blocks. The introduction of 1k number ranges in protected areas required the routing tables to be increased by – potentially - up to an order of magnitude in size.

Whilst this will not apply to every area code the increase in management of the routing tables for CPs with TDM networks will become too onerous.

Complexity may also be added to fault management systems where 'breakout' to the extra digit will have to be implemented.

6 PAYMENT FOR NUMBERS

Colt is opposed to Ofcom's proposal for charging for numbers.

Rather than rely on charging for numbers Ofcom should use its powers described in section 3 above to reclaim unused numbers from CPs.

Charging for numbers will not work, since in order to create an incentive for CPs to return numbers the charges would need to be significant. However, significant charges would unnecessarily penalise CPs who had numbers allocated that were being used efficiently. CPs would be incentivised to pass these charges on to their customers which would be to the detriment of UK consumers.

Colt notes that in the consultation Ofcom has not specified how number charging revenues would be accounted for or used.

7 INCREASE IN DIGIT LENGTH

In the Section 135 information requests made in 2010, Ofcom referred to two options that are not proposed in this consultation.

For the avoidance of doubt, Colt would not support any proposals that would involve changing existing numbers.

Colt would not support any proposal to change the numbers of digits in the National Telephone Dial Plan.