

**What do you want Ofcom to keep confidential?:**

Keep name confidential

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

You may publish my response on receipt

**Question 1: Do you agree with our analysis of consumer detriment on the 070 number range?:**

Yes

**Question 2: Do you agree that the costs outweigh the benefits in relation to closing the 070 number range and migrating users to an alternative range?:**

Yes

**Question 3: Do you agree that Ofcom should keep the 070 range open and monitor the market in light of enforcement action by PhonepayPlus?:**

Yes

**Question 4: Do you agree that Ofcom should require OCPs to give greater prominence to the cost of calling 070 numbers in published price lists and promotional material?:**

Yes

**Question 5: Do you agree that Ofcom should amend its guidance to ensure that PNS providers carry out appropriate due diligence of sub-allocatees of personal numbers?:**

Only when it is absolutely necessary. That is to say, not just to protect the requirements of large organisations trying to control international trade barriers.

**Question 6: Do you agree that Ofcom should not bar the presentation of 070 CLI? Please provide evidence to support your response:**

Yes. CLI is important in day-to-day use. If it is barred on 070 numbers then it should be barred for all other services. There must be better ways to deal with such scams that don't penalise all providers and users.

**Question 7: Should services provided by, for example, Hospedia, Premier Telesolutions and Trader Media be provided on an alternative number range to 070? Please provide any evidence to support your views.:**

Yes. The original reasoning behind 070 numbers was to allow 070 owners to keep the same number no matter where they resided. This has administration and business continuity cost benefits. Additionally, Organisations such as 'Patientline' are premium rate and use their call income for items unrelated to call-forwarding. These type of organisation should use 'recognised' premium rate numbers.

**Question 8: Do you agree that Ofcom should withdraw formally the requirement for pre-call announcements on 070 Personal Numbers?:**

Yes. Apart from its obvious flaws, flagged on several occasions to Ofcom by industry experts, this concept is not in line with ITU and EU recommendations and regulations.

**Additional comments:**

Regulation is supposed to be a method of ensuring that the systems and procedures adopted by business is fair and equitable for all users and suppliers; not to cave in to pressure by the few against the many. A 'common sense' approach used to be enough but that seems to have been cast aside in favour of pointless bureaucracy.