

## **Response From Mr Dougall Giles**

**Question 1:What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions? :** My view is that there is no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 2:What do you think are consumers? key current views on numbering, how do you think those views will change, and how should Ofcom's current decisions take those changes into account? :** I think that the original National Numbering Plan should be applied rigorously, not continuously manipulated by Ofcom to fulfil the latest demands of telcos who wish to use new scams to cheat Citizen Consumers and so that queuing on covert Premium numbers is allowed to continue.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 3:What do you think are the main ways in which technological developments will change the focus of numbering policy decisions, and how should Ofcom's current decisions take these developments into account? :** The only way in which any technological development should require any deviation from the original National Numbering Plan is where any new category or block becomes necessary. This should be added to the existing plan coherently, not inserted deliberately to conceal the real purpose and to scam Citizen Consumers as Ofcom are doing or to facilitate new covert Premium use with call queuing. Ofcom are attempting here to pretend or facilitate the use of supposed "technological advance" to justify future pretence and bamboozle as is their established track record in Telecommunications "regulation".

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 4: Do you have any comments on Ofcom's assessment of the current challenges to the Numbering Plan, in terms of a) number availability, b) transparency, or c) consumer abuses? :** They are totally inadequate and do not take the key issues into account, but continue to circumvent them, most of all the issue of call queuing on covert Premium numbers.

There is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 5: Do you agree that the extension of conservation measures is the best approach to take before the impact of NGNs eases the pressure on geographic number demand?:** No. However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 6: Do you agree that the use of overlay codes is the best backstop approach in the event that extended conservation measures are not sufficient to meet demand for geographic numbers?:** Yes, with reservations provided they are overt and not bamboozle as Ofcom usually currently deliberately seems to permit and condone or arrange, or to introduce a new form of call queuing on covert Premium numbers.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 7: Do you agree that Ofcom should continue to respect the geographic identity of numbers until consumer understanding of the impact of technology change evolves further, and what do you consider is the best way to develop that consumer understanding? :** This question is not in reality about technological change per se, but is deliberately phrased to condone future bamboozle and pretence in the guise of supposed "technological change"! Particularly no doubt the key objective is to be able to inject other scam revenue generating or higher cost calls into any block at any later date. We know your way of working by now.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 8: Do you agree with Ofcom's proposal to open a new '03' number range for non-geographic, non-revenue sharing services? :** Provided that this block is charged at normal geographic call rates and included in all so-called "inclusive" call packages and plans.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 9: How should the '03' range be structured, in terms of tariffs and services? :** One tariff only - normal geographic call rates.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 10: How should the '08' range be structured, in terms of tariffs and services? :** Consumers have already answered this question in many complaints to you and many previous consultations. You know what we want - honesty! You do not seem to have any?

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 11: Which broad approach should Ofcom take to structuring the '09' range, and if a re-structured '09' range is preferred how would you arrange the different types of '09' services (e.g., according to price per minute, price per call, inclusion of adult content)?** It is clear that what is properly required is banding with different charge rates; but the key issue is that ALL calls which generate revenue for the true terminating subscriber, or are charged in ANY at higher rates than normal geographic rates belong here with all call queuing prohibited according to the original National Telephone Numbering Plan. This is what Ofcom are continuously attempting to avoid and delay indefinitely.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 12: Should any specific PRS service categories be identified or segregated in order that parents can block access by their children (e.g., sexually explicit content, gambling)? Is there merit in having a general 'adults only' classification, including a range of services to which access might be restricted on the grounds of content, or might consumers wish to apply different rules for different types of content?** No. There should be a free service provided by all telcos and mandated by Ofcom to block all Premium rate calls including unsolicited Reverse Charge calls, Premium Text messages, etc. In other words all calls which generate revenue for any terminating subscriber in any and every form or are charged at rates other than normal geographic rates. Citizen Consumers can then block them all if they so wish, which most do and will.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 13: Are there any practical means by which the Numbering Plan could provide improved mobile tariff transparency?** Clearly. That was the original plan, which Ofcom have deliberately departed from.

Apply the original National Numbering Plan with no deviations and add any necessary (non Premium, non-surcharge, non scam) categories as any genuine need may arise.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their

contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 14: Do you agree that personal numbers should have a tariff ceiling (or recorded message) to restore trust in those numbers? If so, what level, and should that ceiling include the cost of recorded messages? :** They should certainly not be within 07. If they are going to continue diversion should be paid for by the terminating subscriber and no revenue sharing or Premium collection of any sort should be allowed, unless they are moved to 09 and call queueing prohibited. This was the original National Telephone numbering Plan principle.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 15: Do you agree with Ofcom's proposals to move personal numbers (with the same consumer protection provisions) to the 06 range and to pursue the direct allocation of numbers to end users as proposed at some point in the future?:** NO! As they stand they should have a category within 09.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 16: Do you have any comments on the use of the 05 number range?:** Yes! No revenue sharing, higher charge rates or Premium use shall be allowed. All of this type of use belongs in 09 with call queueing prohibited.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 17: Do you agree that Ofcom's overall proposals for a future Numbering Plan are coherent and comprehensive, and do you have any comments on the timescales in which the changes should be implemented ?:** No! They are totally unacceptable.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 18: Do you agree with the principle of using consumer protection tests in numbering in order to limit consumer abuses, as long as the relevant legal tests are met? Do you have any suggestions for what tests would be appropriate or any conditions that should be met to pass such tests?:** This again is just bamboozle for avoiding moving all Premium and revenue sharing and other higher charge call rate scams into 09 where they belong with all call queuing prohibited.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 19: Do you support the proposal to extend the tariffing provisions of the Numbering Plan so that they apply to customers of all providers on all types of network?:** Yes, of course! Why has it taken this long to even consider enforcing this?

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 20: How do you think the new Numbering Plan could be effectively communicated to consumers?:** By reverting to enforcing the original National Telephone Numbering Plan without mutilation. We all understood that perfectly well!

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention

whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 21:What are your views on Ofcom?s analysis and the different options for number charging ?:** They are inadequate and as usual complete bamboozle.

However, there is in reality no point whatever in a Citizen Consumer qiving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 22:Which, if any, numbers might appropriately be allocated using a value-based charge ?:** None. This is not acceptable to Citizen Consumers.

However, there is in reality no point whatever in a Citizen Consumer qiving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 23:Do you have any other comments on Ofcom?s proposals for numbering as discussed in Section 5, or any other suggestions for how Ofcom might revise the current Numbering Plan or its administration ?:** They are completely unacceptable, and are clearly designed deliberately again to avoid facing the real issues which affect Citizen Consumers. We have already made it quite clear over and over again that what we want is the original National Telephone Numbering Plan enforced. All of this is saliently a continued gambit by Ofcom to avoid their duties.

However, there is in reality no point whatever in a Citizen Consumer qiving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 24:What do you think of Ofcom?s proposed general approach to managing geographic numbers?:** We have no problem with geographic numbers

and Ofcom are no doubt in a much better position than we are to plan capacity for these. All we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, special rate numbers, and Premium call queuing all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 25: Do you have detailed evidence or suggestions on the variables likely to influence demand for geographic numbers, how those variables will change over time, and how Ofcom should develop a demand model?:** No. We have no problem with geographic numbers and Ofcom are no doubt in a much better position than we are to plan capacity for these. All we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 26: Do you agree with the specific proposal for how to extend conservation measures, including the extension to areas with a number shortage predicted in the next five (rather than two) years?:** Ofcom are no doubt able to plan for this rationally and coherently.

We have no problem with geographic numbers and Ofcom are no doubt in a much better position than we are to plan capacity for these. All we ask for is coherence and

complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 27: Do you consider there to be any upper limit, in terms of technical feasibility, on the number of areas in which conservation measures could be used ?:** We have no problem with geographic numbers and Ofcom are no doubt in a much better position than we are to plan capacity for these. All we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 28: Do you agree with Ofcom's assessment of the impact of conservation measures on stakeholders ?:** We are not really in a position to comment on this.

We have no problem with geographic numbers and Ofcom are no doubt in a much better position than we are to plan capacity for these. All we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are

compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 29: Do you agree that Ofcom should pursue these additional ways to improve number utilisation and, if we do, how would stakeholders be impacted and what practical issues are involved ?:** We have no specific comment on this issue.

We have no problem with geographic numbers and Ofcom are no doubt in a much better position than we are to plan capacity for these. All we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 30: What are your views on overlay codes, and Ofcom's assessment of them, as a fallback option to increase number supply? What should be the maximum number of areas where overlay codes are introduced?:** It depends upon which particular blocks Ofcom might decide to overlay. We would not be satisfied with using overlay as a future method of or device for mixing scamming categories with normal geographic numbers as at present.

All we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their

telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 31:What are your views on closing the scheme, and Ofcom?s assessment of it, as a fallback option to increase number supply?:** I do not even understand the meaning of this question. It is coded and indeffinitive.

We have no problem with geographic numbers and Ofcom are no doubt in a much better position than we are to plan capacity for these. All we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 32:What are your views on wide area codes, and Ofcom?s assessment of them, as a fallback option to increase number supply?:** We have no problem with geographic numbers and Ofcom are no doubt in a much better position than we are to plan capacity for these. All we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish

to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 33: Might wide area codes be appropriate in regions with a strong identity and, if so, which specific regions are suitable for wide area codes?:** We have no problem with geographic numbers and Ofcom are no doubt in a much better position than we are to plan capacity for these. All we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 34: Do you agree with Ofcom's assessment of the problems with current 08 and 09 in terms of information clarity and consumer perceptions?:** No. It clearly avoids facing the complete issues.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention

whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 35: Which of these options for current 08 services do you think is best in terms of a) increasing consumer transparency and b) minimising the costs of restructuring the 08 range ?:** None as proposed by Ofcom. You are still avoiding facing the real issues. What we need is reversion to the original National Telephone Numbering Plan. This means moving all uses where there is revenue sharing, revenue generation, Premium generation, higher cost charges of any sort or in any form relative to normal geographic numbers, into the 09 category, where all call queuing is prohibited.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 36: How might early migration to the ?03? range be encouraged?:** It would not be significant if Ofcom did not intend to allow covert Premium use within 08 to continue in contravention to the original National Telephone Numbering Plan.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their

contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 37: Is it more important to indicate price per minute or price per call, and does this vary for different types of PRS service? What granularity of PRS tariff information should be given to consumers by the Numbering Plan?:** It is of no significance except in the case of scam, covert Premium numbers with call queuing, reverse charge scams and the whole plethora of confidence trickery on non-09 numbers. This should all be finally prohibited by Ofcom, by moving all of these uses to 09.

How the charging structure is then implemented within the 09 category is of no interest to most consumers, who do not wish to use any of these.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 38: Should there be any PRS number ranges with no tariff ceiling?:** I would think not or even some of those who might wish to use these numbers could end up with infinite bills which they could not afford to pay?

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 39:What is the typical turnover of 09 numbers, and what does this mean for migration timescales to a new 09 Plan? How could Ofcom structure the 09 range or take other steps to promote voluntary migration of 09 services ?:** I have no comment on this issue.

**Question 40:Do you agree that that part of the 07 range which is currently unused (071-075) should be reserved for mobile services, with the aim of establishing 07 as a mobile ?brand??:** Yes. All Citizen Consumers were under the evident delusion that the complete 07 category was originally supposed to be for mobiles and pagers only without revenue sharing, revenue generation or covert Premium use in the original National Telephone Numbering Plan.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 41:Should Ofcom reserve specific sub-ranges within the 071-075 range for new mobile multimedia services, in the interests of promoting consumer awareness and tariff transparency, and if so how ?:** Only if they will be charged at normal mobile charge rates with all Premium, revenue sharing and revenue generation use prohibited.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 42:Do you support the use of 100,000-number blocks in allocating mobile numbers to new mobile voice providers ?:** Only if they will be charged at normal mobile charge rates with all Premium, revenue sharing and revenue generation use prohibited.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 43:Based on the above analysis, if Ofcom were to introduce a charge ceiling on calls to 070 numbers, which of the following levels should be adopted: Which following levels does this refer to?**

All 07 use must be charged at normal mobile charge rates with all Premium, revenue sharing and revenue generation use prohibited.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 44:Would a requirement to make tariff information clearly available to purchasers of personal numbering services at the point of sale, either in addition to, or instead of a call ceiling, be an effective means of providing tariff transparency on personal numbers?:** No. The use of all PNS current uses belongs clearly within 09 with call queuing prohibited.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 45:If a new sub-range is made available for personal numbering services, how long should the current ?070? sub-range remain available for existing providers, in order to minimise migration costs ?:** Not acceptable.

The use of all PNS current uses belongs clearly within 09 with call queuing prohibited.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these

issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 46:What issues do you think would need to be resolved before Ofcom makes individual numbers available for direct allocation to end users?:** This question is not sufficiently specific.

The principal issue is to ensure that any individual number allocated conforms to the original Telephone Numbering Plan.

The allocation of 09 individual numbers needs additional safeguards clearly, which are not in place now.

**Question 47:What do you consider to be the main strengths and weaknesses of the current rules-based system of UK number allocation?:** That it does not conform to the original National Telephone Numbering Plan.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 48:Do you agree with these principles for number charging?:** Which principles?

I do not agree with any principles for number charging other than those defined in the original National Telephone Numbering Plan.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish

to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 49:What are your views on Ofcom's assessment of the issues to be considered in setting and reviewing number charges? For example, should other issues be considered in developing charging proposals ?:** Yes - reversion to the original Telephone Numbering Plan.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 50:Do you agree that charging for numbers could disincentivise economically inefficient behaviour, and incentivise economically efficient utilisation ?:** No.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their

view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 51:What internal changes would communications providers have to make, and at what cost, to support charging for numbers? Would these changes be preferable to earlier and more widespread use of conservation measures and (limited) changes to increase geographic number supply?:** Consumers clearly could not comment rationally on this issue.

No.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 52:How might existing number allocation rules be reduced if charging for numbers was introduced ?:** Not at all.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their

contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 53:What are your views on this illustrative charging mechanism, and would you suggest any changes or alternatives to it ?:** Not acceptable.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 54:How would charging for number blocks affect consumers ?:** Unfavourably.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 55:What impact do you think charging for numbers would have on sub-allocation? Should Ofcom encourage or facilitate sub-allocation and, if charging were introduced, would changes be needed to the process of suballocation to facilitate trading?:** Not advantageous to Consumers.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 56:Which types of consumer abuse do you think Ofcom should particularly attempt to address through its numbering policy decisions?:** What we ask for as Citizen Consumers is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 57:Which number ranges and types of originating communications provider do you think should be covered by an extension of the Numbering Plan's tariffing provisions? What practical issues are involved, and how would this vary according to the number ranges and service providers involved?:** What we ask for is coherence and complete separation of all scamming, revenue generating,

revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 58:What do you think of the potential conditions proposed by Ofcom for inclusion in a consumer protection test for number allocation, including the proposals that numbers should not be provided to anyone with a particular track record of persistent and/or serious consumer abuse ?:** Unacceptable.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 59:Are there any other circumstances in which it may be appropriate for Ofcom to refuse number allocations ?:** Yes ! If they contravene the original National Telephone Numbering Plan.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their

telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 60: Would you support the use of a consumer protection test as a basis for withdrawing number allocations? What kind of considerations should Ofcom apply in any such test, and what would be the practical issues involved in applying such a test ?:** No.

No tests would be necessary if Ofcom face up to the real issues.

What we as Citizen Consumers ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Question 61: What consumer abuses do you think might occur in the future, and what steps might Ofcom take now in its numbering policy in order to reduce the potential for such abuses?:** If you continue to fail to regulate adequately and continue to fail in your predominant duty to protect the Citizen Consumer, there is no limit to the abuses, confidence tricks, scams, rackets and gambits which will continue within the UK telecommunications network to exploit and defraud the UK Citizen Consumer.

The first necessary step is to enforce the original National Telephone Numbering

Plan, and to ensure that no further abuses of it are allowed. The other key component is to police the system and prevent and prohibit any device, method or means attempted to extract revenue illegally from the Citizen Consumer. One of the key ways to do that is to actually LISTEN to Citizen Consumers who inform you that they have been or are being cheated and robbed through the latest trick. This is what you currently fail to do. Between Ofcom, Otelco and ICSTIS there is a cosy relationship which enables you to avoid taking any action to correct or prohibit scams and abuses. This is what must be addressed.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, there is in reality no point whatever in a Citizen Consumer giving their view on this issue, since Ofcom have proven conclusively and continuously their contempt for Citizen Consumers in their "consultations" and that they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has an incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!

**Additional Comments:** This consultation is yet another example of Ofcom's muddled bamboozle approach to the realities of the current abuses of the original National Telephone Numbering Plan.

When you get lots of responses to a consultation which are the opposite of what you wanted to hear, and many complaints from Citizen Consumers which are the opposite of what you wanted to hear, your approach is to have another consultation and another and another - it seems in the hope that they will not respond the next time so that you can disregard their views. You also attempt to hide the key issues amongst as much dross as possible in your subsequent consultation, to avoid the real action necessary. You also seem to hope that consumers will also be so overwhelmed by the sheer scale of your smoke screen that they will not understand the issued the next time?

The fact is, you have asked these same questions time and time and time again in an incessant number of serial consultations. Citizen Consumers have expressed their views on these key issues over and over again. You are well aware of what Citizen Consumers want you to do to protect them; but you stall and turn the other way.

Citizen Consumers want an end to all of these devices and tricks that have been deliberately allowed by you so that they can be fleeced by the telcos at every possible juncture, particularly call queuing being allowed on covert Premium numbers. That is not an unreasonable demand from us. In practically every other area of commerce

any of the scamming methods being used by telcos and allowed by you would be ILLEGAL and would be and are crimes of extortion.

What we ask for is coherence and complete separation of all scamming, revenue generating, revenue sharing, unsolicited reverse charging, unrequired or specifically individually accepted reverse charging, and special rate numbers, all of which can be blocked free of charge by Citizen Consumers to prohibit their use on their telephone, and that all telco providers are compelled to provide this service to their customers free of all charges.

Those who wish to continue to be victims may then offer themselves; those who wish to opt out of all these scams may then do so without incurring any cost.

However, Ofcom prove conclusively and continuously their contempt for Citizen Consumers in their "consultations" because they pay no attention whatever to the views of Citizen Consumers, despite it being Ofcom's principal duty under the Acts to protect the interests of the Citizen Consumer. Indeed it is clear that the principal reason that Ofcom has this incessant plethora of "consultations" on these issues is to avoid taking the regulatory action which they know they should take under the Acts!