

Additional comments:

Question 2.1: Should new replacement 080 numbers ? offered to SPs with 0500 numbers in use at present as a migration path away from the 0500 range, prior to the withdrawal of the 0500 range ? begin with an 080 85- prefix or with an 080 50- prefix? Please explain your preference. :

While Ofcom has long allocated all 080 numbers as freephone and restated this in consumer numbering guides, it is by no means certain that consumers will readily see all 080 numbers as free.

It is quite possible that freephone 'brand' recognition is still attached specifically to 0800 and, to a lesser extent, 0808, especially as such numbers are pretty consistently advertised in the format 080x xxx xxx rather than 080 xxxx xxxx and many telephone companies' tariff guides refer to "0800 and 0808 numbers" rather than "080 numbers". The significant tariff differences between 0844/0843 and 0845 or 0870 and 0871/2 are also likely to have conditioned consumers into expecting significant differences between 08 numbers where the first three (0-S-A) digits are alike.

Given the above, it is very possible that consumers would see 0805 numbers as an entirely new prefix rather than simply an extra batch of numbers in the '080' freephone range - just like London's new (020) 3 numbers were wrongly perceived as an additional new "0203" code by many. Service providers migrating from 0500 may also face difficulties in convincing customers that their new 0805 numbers are free, if there are no existing 0805 numbers in circulation.

It would therefore seem best to migrate 0500 numbers to the existing 0808 range (the "0808 5" option), rather than trying to establish an entirely new sub-range. With significant spare capacity in the 0808 range, relatively low demand for allocations of new 080 numbers in the last two years, and the scope of reclaiming significant capacity from the 0808 0 and 0808 5 ranges, this should not create any problems and avoids the risk of substituting one poorly recognised Freephone range (0500) for another (0805).

Question 2.2: Do you agree with our assessment of the technical difficulties, and potentially significant costs and disruption, that would result from making the proposed 080X migration sub-range available for allocation to all CPs currently hosting active 0500 telephone numbers and that, accordingly, it is appropriate to restrict the allocation of the sub-range to Vodafone (C&WW) during the migration period? If not, please explain your reasons.:

No comment.

Question 2.3: Do you agree with the measures proposed to ensure that all 0500 SPs are able to migrate regardless of the CP they use to host their 0500 number(s) currently? If not, please explain your reasons.:

No comment.

Question 2.4: Do you agree with our proposal to impose a time limitation of 3 years and 3 months on the allocation of each block of 10,000 numbers within the 080X migration sub-range to Vodafone (C&WW), save to the extent that

at least one number within the block is taken up by a migrating 0500 SP (in which case the allocation of that block will not be so time-limited)? If not, please explain your reasons. :

Yes, although it could appear inconsistent given that no such provision has been made regarding the similar 0808 0xx sub-range into which former Vodafone 0321 freephone numbers migrated a little over a decade ago.

Although the fact that both groups of numbers are now held by Vodafone would probably clear Ofcom from any accusation of unduly favouring a particular range-holder, it would seem sensible that the same rules apply to migrated 0500 and 0321 numbers alike (i.e. both the current 0808 0 sub-range and the proposed 0805 0 or 0808 5 sub-range).

An analysis of usage in the 0808 0xx range could also help inform Ofcom's plans for recovering numbers due to the similar circumstances. Determining how many 10,000 number blocks have become free since the completion of 0321 migration in 2001 may give an indication of what timescales and patterns could be expected after 0500 migration.

Question 2.5: Do you agree with our proposal of a 3-year timeframe for the withdrawal of 0500 numbers and for the migration of active services on these numbers to a new 080X sub-range (if so desired by any individual SP operating an 0500 number)? If not, please explain your reasons.:

Very reasonable. Number changes are still an annoyance, but so much trade and communication has moved online since the big number changes of 1995 and 2000. It's now much easier to get a new number into circulation, or for consumers to look up the current number of a company when they find the number they have on file no longer works.

Question 3.1: Do you have any comments on the draft modifications to the Numbering Plan, as set out in Annex 8, that we are proposing? Where you disagree with any of the proposed modifications, please explain why.:

No comment.

Question 3.2: Do you have any comments on the draft modifications to the numbering application form, Form S8, as set out in Annex 9, that we are proposing? Where you disagree with any of the proposed modifications, please explain why. :

No comment.