

RESPONSE TO HARMONISED EUROPEAN NUMBERS FOR SERVICES OF SOCIAL VALUE

17.05.10

Cable&Wireless
Worldwide

Cable&Wireless Worldwide is one of the world's leading international communications companies. On the 26th of March 2010 Cable&Wireless Worldwide demerged from Cable&Wireless plc, beginning an exciting new chapter in the company's history. Cable&Wireless Worldwide is a major provider of communication solutions to enterprises in the United Kingdom. We aim to provide great value and great service to all our customers.

At present Cable&Wireless Worldwide is working closely with the Department of Health in the roll out its '111' as the primary contact number to access non-emergency healthcare advice in England. We welcome the close parallels Ofcom has drawn between the Department of Health's service and the EU initiative for 116117, 'Non-emergency medical on-call service'.

We fully support the proposal to link the tariffs between 111 and 116117 with both being designated as "free to caller". This will prevent consumer confusion as to the price of calling either service and is the ideal pricing to promote tariff transparency. Without seeking to pre-judge the Service Provider selection process, were the Department of Health to show an interest in the new number, selecting them would also avoid potential consumer confusion caused by conflicting services competing on the numbers. It is essential that the extreme social value of both 111 and 116117 is preserved and that the services provide consumers with the greatest level of benefit rather than becoming differentiated by price considerations. Cable&Wireless Worldwide therefore fully supports Ofcom's proposals in relation to 116117.

In relation to 116006 Cable&Wireless Worldwide agrees with Ofcom's analysis and the guidance from the Advisory Committee. There is a concern however in relation to pricing transparency. As these services proliferate there will potentially be an

increasing mix of numbers that could range in price from zero to forty pence per minute. Consumers are understandably likely to struggle to understand the difference in pricing that could vary from 'free to caller' on the one hand and a 'freephone' service costing anywhere up to 40ppm. Such confusion could be entirely mitigated by categorising all 116XXX numbers as "free to caller".

QUESTIONS

- 1. DO YOU AGREE THAT 116006 'HELPLINE FOR VICTIMS OF CRIME' SHOULD BE 'FREEPHONE'? PLEASE GIVE REASONS FOR YOUR VIEWS.**

Cable&Wireless Worldwide supports the findings from Ofcom's analysis, but cautions that should a subsection of operators choose not to offer 116006 without charge, it is likely to cause consumer confusion. The distinction between 'freephone' and 'free to caller' appears to be at odds with Ofcom's desire for pricing transparency in relation to other number ranges. Clarity is especially important in ranges deemed to be of social value.

- 2. DO YOU AGREE THAT 116117 'NON-EMERGENCY MEDICAL ON-CALL SERVICE' SHOULD BE 'FREE TO CALLER'? PLEASE GIVE REASONS FOR YOUR VIEWS.**

The designation of 116117 is fully supported by Cable&Wireless Worldwide.

- 3. DO YOU HAVE ANY SPECIFIC COMMENTS ON THE PROPOSED MODIFICATIONS TO THE NUMBERING PLAN SET OUT IN ANNEX 6?**

Cable&Wireless Worldwide believes that the modifications Ofcom proposes to make to the numbering plan are appropriate. The terms 'freephone' and 'free-to-

caller' with the requirements these place upon operators are already clearly defined under "Definitions and Interpretation". We therefore support these changes.