

**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?:**

Yes, if proportional. For example, posting an authorisation code to the billing address of a subscriber paying by bank card. Requiring a subscriber to present sensitive documents, for example a passport, for the merchant to copy, seems disproportionate, and exposes subscribers to identity theft risk from, say, rogue employees of merchants, or rogue merchants set up for the purpose.

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

Yes. Abusus non tollit usus. But to bar its use for a presentation number for calls originating in the VOIP environment might be proportionate.

**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, unless they assign one unique 070 number to each end user, for life, and allow them to control its routing. Otherwise they are clearly misusing a personal numbering service to pay for a premium service.

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

Yes. This practice appears to be in restraint of trade.

**Additional comments:**

A proportionate response to the misuse of brief calls from 070 numbers to generate return calls to fake "missed calls" might be to require service providers who send 070 CLI to create an alarm condition which results in investigation, and service suspension if necessary, if a threshold of n calls under s seconds each, terminated by the calling party before the called party answers, is made in a defined period