



Verizon Enterprise Solutions response to Ofcom's Proposed modifications to the telephone number application forms

1. Verizon Enterprise Solutions ("Verizon") welcomes the opportunity to respond to Ofcom's Proposed modifications to the telephone number application forms (the "Proposals").
2. Verizon is the global IT solutions partner to business and government. As part of Verizon Communications – a company with nearly \$108 billion in annual revenue – Verizon serves 98 per cent of the Fortune 500. Verizon caters to large and medium business and government agencies and is connecting systems, machines, ideas and people around the world for altogether better outcomes.
3. Verizon welcomes the changes outlined in the Proposals, and considers that they should represent a significant improvement over the current arrangements. Verizon agrees that as described the Proposals should modernise and simplify the procedure used by Communication Providers ("CPs") to obtain telephone numbers. From the description given, the new web-based number management system should provide a much better experience for CPs, give them more control over their requests and make the whole process quicker, easier and more transparent.
4. It also appears that the new system will bring substantive benefits for Ofcom as well, in the management and control of number allocations. This can only be a good thing and we would hope and expect that over the longer term it will serve to reduce the costs associated with number management. However while automated systems can bring about welcome efficiencies, they need to be fully tested by users in advance to ensure they are fit for purpose. We would therefore expect Ofcom to carry out comprehensive user acceptance testing in advance of the system going live. In addition Ofcom should ensure that there is some form of back-up system in case of failure of the automated process.
5. The modifications to the information that will be requested, set out in Section 3 of the Proposals, appear to be reasonable, proportionate and not unduly burdensome.
6. We would urge Ofcom to ensure that the guidelines it intends to publish to advise CPs on the benefits of the capabilities of the system (as indicated at paragraph 4.18) also set out clear instructions on the use of the new system, so there is a smooth transition from the legacy process.

Verizon Enterprise Solutions
January 2014