

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: [Telephone Numbering - Safeguarding the future of numbers](#)

To (Ofcom contact): Andy Montaser NumberingReview@ofcom.org.uk

Name of respondent: Paul Ebling

Representing (self or organisation/s): Self

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing	<input checked="" type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
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Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

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Name Paul Ebling

Signed (if hard copy) *Paul Ebling*

Telephone Numbering - Safeguarding the future of numbers

I welcome the opportunity to comment on this matter.

I'm afraid I do not have time to study over 140 pages, but I would like to offer the following general comments, please:

Overlay Numbers

“Overlay” numbering is not a good idea. It is currently causing much confusion in those parts of the world where it was adopted – usually as an expedient because no alternative existed. If overlays are introduced, 98% of people in a typical area would be able to reach each other by dialling just the local number, but those with overlay numbers would not be reachable in this way. Businesses would perceive (rightly) that they are being disadvantaged by being given an overlay number. Public confusion would be significant, especially in tourist areas, where visitors would not be familiar with the local situation. The last numbering consultation indicated that the public strongly support “local dialling procedures”, preferring to dial 6 figures instead of 11 to call someone nearby - a majority of the land-line calls made. Overlay numbering is incompatible with this clearly expressed public preference.

“Wide Area Numbering” is the correct way forward, as already completed in London and Ulster, and started in Cardiff, Portsmouth / Southampton, and Coventry. In my opinion it is better to change existing numbers from 6 to 8 digits in a clean and tidy way - with adequate notice and a parallel running period - than to use overlays. If the alternatives are fully and clearly spelt out to the Public, they may well become less resistant to such logical changes of numbers.

If Ofcom really do believe that it has become imperative at present to avoid ANY number changes for existing customers, then each area at risk of exhaustion needs a currently unused “second selector level” reserving urgently so that a Linked Numbering Scheme can be created with a mixture of 6 digit (existing) and 8 digit (new) numbers. The six digit numbers retain the existing 01ABC code and the 8 digit use the currently proposed wide area code for that town - e.g. 023. This gives the advantages of overlay, but they can still inter-dial local calls using the 6 or 8 digits of the local number. Incoming national / international calls should use the appropriate codes according to the number of digits in the number. This kind of situation is not new. Frequently it has been necessary to publish one code for say 5-digit numbers and a different code for 6-digit numbers.

For example, if Bournemouth is at risk of exhaustion, retain 01202 followed by digits 2 - 8 for 6-figure numbers, but reserve (say) level 94 to create 8 digit numbers. Initially, use (023) 941X XXXX, 949X XXXX and 940X XXXX, so the last 6 figures do not overlap between the two ranges. This leaves open the option of extending wide-area numbering, by changing the 6 figure numbers to 8 figure by prefixing with 94, if public opinion develops in this way. Furthermore, anyone misdialling a “wide area number” 023 94DX XXX when they should be dialling 01202 DXX XXX (i.e. where “D” is in the range 2-8) can either be routed to the desired number or given a suitable recorded message according to policy as determined from time to time.

Non-Geographic Numbers

Provided that you do not compromise the extension of Wide-area Numbering, moving “Cheaper Non-Geographic Numbers” to 03 seems to me to make some sense. I trust you will give back the memorable numbers to their rightful owners in the process! E.g. 0345 678910.

As you propose that 04 should be reserved for “future use”, presumably Wide-area Numbers could begin with 02 and 04 in order to free up 03.

0870 / 0871 require additional controls to prevent profit sharing as though they were Premium Rate numbers. 0871 is more like a Premium Rate number range, and should be treated accordingly. This has been fully rehearsed elsewhere.

Personal Non-Geographic Numbers

I feel that the distinction between “Mobile Numbers” (07 ABC XXX XXX where A is in the range 6 - 9) and personal numbers (070BC XXX XXX) is insufficiently clear considering the way in which the prices of calls to the two ranges can currently differ, and may diverge in the future.

Moving Personal Numbers to 06 might be helpful in this respect, as well as increasing numbering space for Mobiles, which may become necessary in due course.

Thank you for your attention.

Paul Ebling

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