

**Representing:**

Self

**Organisation (if applicable):**

**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?:**

No. It has ignored a huge problem with 070 numbers.

These numbers are used extensively by advance fee fraudsters to represent themselves as being in the UK when in fact they are in West Africa or elsewhere in the world. In order to see this problem it is only necessary to search the web for "+44-703" for example.

Here's a link: [http://www.google.co.uk/search?hl=en&lr=&client=firefox-a&rls=com.ubuntu:en-GB:unofficial&hs=qYq&as\\_qdr=all&q=%2B44-703&start=10&sa=N](http://www.google.co.uk/search?hl=en&lr=&client=firefox-a&rls=com.ubuntu:en-GB:unofficial&hs=qYq&as_qdr=all&q=%2B44-703&start=10&sa=N)

**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?:**

Migrating customers to an alternative range would help, in that it distances them from mobile phones. However it is not a complete solution, and in view of that the costs may outweigh any benefits.

**Question 3: Do you agree that Ofcom should keep the 070 range open and monitor the market in light of enforcement action by PhonepayPlus?:**

PhonepayPlus does not seem to be attacking advance fee fraud, and it is difficult to see how that might be done. The fraudsters are individuals living in another country. The only possibility is to enforce extensive due diligence on the operators, involving proof of identity and address. This may have large implementation costs.

**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. Advertised rates for 070 numbers, along with a coherent description of what they are may allow fraud victims to realise that the number they are calling may not be in the UK. However it does nothing to advertise that fact to victims in other countries who think they are calling a UK number.

**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. All sub-allocatees should be required to prove their identity and residential address with a high degree of security. About the same as banks and credit card companies require.

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

I have no opinion.

If the CLI could be made to display the number that the call is redirected to, that would be great. However this may be expensive or impossible.

**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.:**

I have no opinion

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

I would want a pre-call announcement that the call is being redirected, and either the country it is being redirected to or a statement that it may not terminate in the UK.

**Additional comments:**

Advance Fee Fraud (aka 419) is a major problem costing the UK in excess of £3.5 billion. See this publication from UK Serious Organised Crime Agency (SOCA): <http://www.soca.gov.uk/downloads/massMarketingFraud.pdf>

The availability of redirection numbers anonymously and free of charge is a boon to such fraudsters. 070 numbers are used in a massive proportion of these frauds, maybe in excess of 50%. With these numbers, the fraudster can represent themselves as residing in the UK. Far more people will trust them if they believe they are in the UK than if they know they are in West Africa.

While these frauds would not stop if the 070 numbers were withdrawn or policed better, the fraudsters would lose a major advantage. If even 1% of victims were saved from being defrauded, (and that is a pessimistic figure,) the UK alone would save tens of millions of pounds annually.

This is a major impact, which your research has not considered. I urge you to do so before taking the matter any further.