



Increasing the supply of Reseller Identification Codes (RIDs)

Proposal to modify the National Telephone
Numbering Plan to change the format of RID administrative
codes

Consultation

Publication date: 27 October 2014

Closing Date for Responses: 28 November 2014

About this document

This consultation concerns a type of code known as a Reseller Identification Code (RIDs) that is allocated by Ofcom to communications providers (CPs) for administrative purposes.

Each RID is used to identify a reseller of BT's wholesale services. Changes to the process for customers switching may lead to an increase in demand for RIDs from resellers and, in their current format, there may not be sufficient unique RIDs to satisfy demand. This document sets out our consultation on our proposals to change the format of RIDs to accommodate expected increases in demand.

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Section 1

Summary

- 1.1 This document is about a type of code, known as a Reseller Identification Code or RID, that Ofcom allocates to communications providers (CPs) for administrative purposes. We are proposing a change to the format of RIDs to increase the number of codes available. This is in order to meet potential increased demand for RIDs from CPs.

Background & need for change

- 1.2 It is Ofcom's responsibility to administer the UK's telephone numbers and to ensure that best use is made of these numbers. As designated in the National Telephone Numbering Plan ('the Numbering Plan')¹, RIDs are three character alpha-only codes used for administrative purposes to identify a reseller² of BT's wholesale services. They are used to identify the CP placing an order with Openreach for the transfer of a line from another CP.
- 1.3 We typically issue around 300 RIDs each year. The use of RIDs to date has been limited to CPs migrating fixed voice and fixed line services (WLR³ and MPF⁴) on the Openreach network, as these follow the Notification of Transfer (NoT) process. However, as a result of our decision to harmonise the switching process for fixed voice and broadband services on the Openreach network to a single Gaining Provider Led (GPL) NoT process⁵, we expect the demand for RIDs to increase as broadband only CPs will need a RID for the first time.
- 1.4 Within the context of our programme for the implementation of changes to the switching process over the Openreach network, we have also encouraged CPs, particularly retail CPs entering into contractual agreements with end-users for the provision of communications services, to use a unique RID. As many retail CPs previously used the RID of their wholesale provider to place orders, we expect that a number of retail CPs who already use the NoT process may also request a RID for the first time.
- 1.5 Under the current format of AAB to ZZZ, there are 15,625 combinations of RIDs available, of which 3,264 have been allocated as of 15 October 2014. In discussion with stakeholders at the Switching Process Implementation Group (SPIG) meetings, there have been some suggestions that the overall demand for RIDs may increase to 20,000. Therefore, there is a risk that we may run out of RIDs in their current format.

¹ <http://stakeholders.ofcom.org.uk/telecoms/numbering/>

² In this context, a reseller includes both reseller of wholesale services and a retail CP using resale services.

³ WLR – Wholesale Line Rental

⁴ MPF - Metallic Path Facility

⁵ See documents:

http://stakeholders.ofcom.org.uk/binaries/consultations/consumer-switching-review/summary/Consumer_Switching.pdf

<http://stakeholders.ofcom.org.uk/binaries/consultations/consumer-switching-review/statement/statement.pdf>

Proposals for consultation

- 1.6 In this document we are setting out our proposals for a new format of RIDs and also seeking views from stakeholders as to the likely demand for RIDs.
- 1.7 We have identified three options for the format of RIDs.
- Option 1: Do nothing. If responses from stakeholders suggest that the demand for RIDs is unlikely to exceed 15,600, we may decide to retain the current format of RIDs. This would be on the basis that there is little evidence of risk that the RID capacity under the current format would be insufficient.
 - Option 2: Extend RIDs to three character alphanumeric format (i.e. using both alphabetic characters and numbers such as AA1). This will increase the number of RIDs available to approximately 40,000.
 - Option 3: Extend RIDs to a four character alpha-only code, increasing the number of RIDs to almost 400,000.
- 1.8 Having considered these options, our preferred approach, on which we are consulting in this document, is Option 2. We initially favour this option as:
- The changes to the switching process mean that it is difficult to predict future demand for RIDs and this presents a risk that we may run out of available RIDs for allocation. We therefore consider action is required in order to increase supply and do not propose Option 1.
 - Following discussion at SPIG, we understand that it would be easier for CPs to retain RIDs in a three character format rather than move to a four character format. We expect that option 2 will provide sufficient RIDs to meet future demand. We therefore do not propose Option 3.

Next steps

- 1.9 The Numbering Plan sets out the designation of RIDs. Our proposal to change the format would require a modification to the Numbering Plan to bring it into effect. Annex 3 of this document contains a notification of the modification reflecting the option proposed. We will re-consult on a new notification if we decide, in light of responses to this consultation, to proceed with a different option that requires a modification to the Numbering Plan.
- 1.10 We are seeking responses to the proposed modification to the Numbering Plan and general comments on our proposals by 5pm on 28 November 2014.
- 1.11 Once this consultation has closed, we will take account of all submissions received and then reach a decision.
- 1.12 We plan to publish the statement and the revised Numbering Plan in Spring 2015.

Section 2

Introduction and background

The need for this consultation

- 2.1 Ofcom is responsible for the administration of the UK's telephone numbers. We do this as part of our regulation of the communications sector under the framework established by the Communications Act 2003 ("the Act").
- 2.2 We are required by section 56 of the Act to publish a Numbering Plan, setting out the telephone numbers available for allocation and any restrictions on how they may be adopted or used. We make the latest version of the Numbering Plan available on our website.⁶
- 2.3 Administrative codes used to identify CPs are classed as telephone numbers under section 56 of the Act. These administrative codes include RIDs. A RID is defined in the Numbering Plan as:
- "a three-character alphabetic Administrative Code (e.g. 'AAB') that is Adopted or otherwise used to identify a reseller of BT's wholesale services".*
- 2.4 According to Part A of the Numbering Plan, RIDs are available for allocation in the format AAB to ZZZ inclusive. This provides for 15,625 combinations of RIDs, of which 3,264 have been allocated as at 15 October 2014.
- 2.5 RIDs are currently used as a part of the GPL NoT switching process for the migration of fixed voice and fixed line services (WLR and MPF) on the Openreach network. They are used to identify the CP placing the switching order. We allocate around 300 RIDs each year.
- 2.6 However, changes explained below designed to harmonise the switching process for fixed voice and broadband services on the Openreach network will lead to an increase in demand for RIDs. This consultation considers whether we have a sufficient supply of RIDs available for allocation to meet future demand. It presents the options we have examined and sets out our proposed approach for addressing the situation.

Likely increase in demand for RIDs

- 2.7 In 2013, we set out our decision⁷ to harmonise the switching process for fixed voice and broadband services on the Openreach network to a single GPL NoT process. We are working with industry, including through the establishment of the Switching

⁶ <http://stakeholders.ofcom.org.uk/telecoms/numbering/>

⁷ See documents:

http://stakeholders.ofcom.org.uk/binaries/consultations/consumer-switching-review/summary/Consumer_Switching.pdf

<http://stakeholders.ofcom.org.uk/binaries/consultations/consumer-switching-review/statement/statement.pdf>

Process Implementation Group (SPIG), to implement the harmonised process by 20 June 2015.

- 2.8 As a result of the harmonisation programme, we expect the demand for RIDs to increase. Currently, the use of RIDs is limited to the CPs migrating fixed voice and fixed line services (WLR and MPF) on the Openreach network, as these follow the NoT process. Providers of broadband only services are not currently required to have a RID because their customers need to request a Migration Authorisation Code (MAC) from the losing provider and do not follow the NoT process. For these broadband providers to be able to place orders using the NoT process, they will each need a RID.
- 2.9 In the context of our switching implementation programme, Ofcom has encouraged CPs, specifically retailers entering into a contractual agreement with the end user for the provision of communications services, to use a unique RID. This is to enable CPs to provide accurate and reliable reports to Ofcom for the purpose of assisting our monitoring and enforcement capabilities in tackling mis-selling and slamming. These reports are to be provided by any CP conducting migrations within their own footprint. We understand that many retail CPs directly entering into contracts with end users currently use a RID belonging to their wholesale provider. Therefore, a number of retail CPs who already use the NoT process today may request a RID for the first time as well.
- 2.10 We expect that the vast majority of retail CPs that have not been allocated their own RID to date are either small retailers of communications services or are broadband only CPs. Therefore it is particularly difficult to estimate the number of companies who will need a RID as a result of the switching harmonisation programme. In discussion with stakeholders at the SPIG meetings, there have been some suggestions that the demand for RIDs could increase to 20,000. However, other CPs have also provided much lower estimates.
- 2.11 We are seeking views from industry on the potential number of RIDs which will be required when all CPs providing fixed voice or broadband service are required to follow the NoT process.

Question 1 – What is your estimate of the number of RIDs that will be required by your downstream CPs who contract with end users, at the harmonisation date of 20 June 2015?

Question 2 – What is your estimate of the total number of RIDs that will be required by industry at the harmonisation date of 20 June 2015? On what basis have you reached this estimation?

Section 3

Options for consultation

- 3.1 In Section 2 we set out the changes that are taking place which may drive increased demand for RIDs. We explained that due to the requirement to harmonise switching of services based on the Openreach copper network to the NoT process and the potential need for unique RIDs to be allocated to individual retailers of communications services, it is likely that there will be a significant increase in the demand for RIDs. However, we also noted that the scale of this increase was uncertain and have sought views from stakeholders on how demand might develop.
- 3.2 In this section we present the options we have considered for increasing the supply of RIDs, assess their potential impacts, and, following on from this, set out the option that we currently prefer in light of the uncertainties as to how future demand for RIDs will develop.

Option 1 – No change to the current RID format

- 3.3 RIDs are currently three character alpha-only codes, in the form AAB to ZZZ. There are 15,625 combinations of RIDs, of 3,264 have been allocated as of 15 October 2014, leaving over 12,000 RIDs available for allocation.
- 3.4 If the stakeholder responses to our questions in Section 2 suggest that there is little evidence of risk that the RID capacity under the current format would be insufficient to meet demand, we may decide to retain the current format of RIDs.

Option 2 – Extend RIDs to a three character alphanumeric format

- 3.5 If stakeholder responses to our questions in Section 2 suggest that there is a risk that demand for RIDs could exceed 15,600 following harmonisation, we would need to implement a change to the format of RIDs to increase the number of available codes.
- 3.6 Under Option 2 we would retain a three character code, but extend the format of each character from alpha-only to alphanumeric (i.e. using both alphabetic characters and numbers such as AA1). This would increase the supply of RIDs to approximately 40,000. With this change, we would continue to issue codes in an alpha-only format until these are exhausted. Thereafter, codes would be a mixture of alpha characters and numbers.
- 3.7 CPs' administrative systems are currently constructed to recognise and handle three character alpha-only RIDs. Extending the format to include three character alphanumeric RIDs would require CPs to make some adjustments to their systems.

Option 3 – Extend RIDs to a four character alphabetic format

- 3.8 Another option for extending the number of available RIDs would be to retain the alpha-only format of the code, but introduce a fourth character. This would increase the number of available RIDs to almost 400,000. However, to implement this change, we may need to add an extra character to the three character RIDs which have already been issued to maintain a uniform format across all RIDs.

- 3.9 As stated in relation to Option 2, CPs' administrative systems are currently constructed to recognise and handle three character alpha-only RIDs. More significant adjustments would be required to accommodate four character RIDs.

Assessment of options

Impact assessment

- 3.10 Impact assessments form a key part of the policy-making process and provide a transparent way of considering different options for regulation, including not regulating. The analysis set out in this document comprises Ofcom's impact assessment as defined in section 7 of the Act.

Equality impact assessment (EIA)

- 3.11 We assess the effect of functions, policies, projects and practices on equality in accordance with the Equality Act 2010.
- 3.12 EIAs assist us in making sure that we are meeting our principal duty of furthering the interests of citizens and consumers. We have therefore also considered what (if any) impact the issues under consideration in this document may have on equality. Where relevant, we have highlighted our consideration of equality issues in the document.
- 3.13 We have done an initial assessment and do not believe our proposal will have an impact on equality. As such, we do not propose to carry out a more in-depth EIA.

Impact on consumers

- 3.14 RIDs are administrative codes which are only used between CPs, and therefore changes to the RID format would not have any direct impact on consumers.
- 3.15 However, unique RIDs will mean that there is more accurate information on the orders placed between CPs when transferring customers between them. Where a slam or an Erroneous Transfer has occurred, an accurate RID would help the CP losing the customer to identify the provider who has placed the order, and would speed up the dialogue for restoration of the service to take place. Ensuring a sufficient supply of RIDs to identify all CPs with a retail relationship with customers could reduce the harm caused to a consumer where they have been slammed or have had their telephone services switched in error.
- 3.16 Additionally, there could be an indirect impact on consumers were we to run out of RIDs and new CPs are prevented from entering the market because they are unable to place NoT orders. This could adversely impact consumer choice and competition.

Impact on CPs

- 3.17 **Option 1** (no change) means existing CPs would not have to make any changes to their systems as RIDs would be maintained in their current format. However, was demand for RIDs to exceed capacity provided by the current format, new entrants would not be able to request a unique code and could be prevented from entering the market.
- 3.18 **Option 2** (extending RIDs to three character alphanumeric codes) would require CPs to make changes to their systems to accept alphanumeric codes and not just alpha-

only codes. However, since we intend to continue to issue alpha-only codes until these are exhausted, CPs who do not wish to make these changes now can delay their changes to a later date when the first alphanumeric codes are issued.

- 3.19 **Option 3** (extending RIDs to four character alpha-only codes) would require CPs to adapt their systems to accept four character codes. However, unlike Option 2, all CPs would need to do this before the four character codes are implemented, as existing RIDs will have to be extended into four character codes. This would immediately impose costs on all CPs.

Impact on availability of numbers

- 3.20 In this section, we assess the impact of the options against both the availability of RIDs and on the supply of numbers for other purposes.
- 3.21 **Option 1** (no change) would mean that there is a risk that RID capacity would be insufficient was CP demand for codes to exceed the 15,625 codes available. Some codes could be conserved by CPs returning multiple RIDs where they currently hold more than one. However, this would not provide a long term solution.
- 3.22 Under this option we are not making any changes to the format of the code, so there is no impact on the supply of numbers for other purposes.
- 3.23 **Option 2** (extending RIDs to three character alphanumeric codes) would mean that there would be approximately 40,000 RIDs. As our largest estimate from industry to date for likely demand is 20,000, RID capacity under this option should be sufficient.
- 3.24 However, under this option we would reserve the format of three character alphanumeric codes for the purpose of RIDs. Although Ofcom is not currently aware of any other uses of such a code, this may remove the potential for these codes to be used for a different administrative purpose in the future.
- 3.25 **Option 3** (extending RIDs to four character alpha-only codes) would mean that there are almost 400,000 RIDs, well in excess of the expected demand as indicated by industry.
- 3.26 This option would mean that four character alpha-only codes are reserved for RIDs. As in Option 2, Ofcom is not currently aware of any other uses of such a code, but this may remove the potential for these codes to be used for a different administrative purpose in the future.

Provisional views – our consultation proposals

- 3.27 Having assessed the options, our initial view is that Option 2 is likely to be the most proportionate in terms of balancing the risk of demand for RIDs exceeding capacity against imposing additional costs by amending the RID format.
- 3.28 Option 2 provides for expansion of available RIDs significantly in excess of the highest estimates provided by industry so far. We note that under Option 2, we would continue to issue RIDs as three character alpha-only codes until these are exhausted. CPs also have greater choice as to when they need to make the appropriate changes to their systems to accommodate the new format of the code.

- 3.29 Feedback from industry stakeholders at SPIG also suggests that that it is a simpler change to incorporate a three character code in a new format than to introduce a new four character code.

Question 3a – Do you agree with our proposal to increase the number of RIDs by changing the format of the code to a three character alphanumeric code, as per Option 2?

Question 3b – Please provide us with an indication of the scale of costs that Options 2 and 3 would entail.

Question 4 – Are you aware of any other administrative purposes for which a three character alphanumeric code might be required or be useful?

Legal tests and duties

- 3.30 Our proposals would require a modification to the Numbering Plan. It is our duty, when proposing a modification to the Numbering Plan, to show how we consider that the proposal complies with our legal tests and duties in the Act (see Annex 1 for further information on the legal framework).
- 3.31 The proposed modifications to the Numbering Plan would extend the format of RIDs to a three character alphanumeric format, thereby increasing the supply of available codes for allocation to CPs and facilitating the harmonisation of switching processes.
- 3.32 We are satisfied that the proposed modifications to provisions of the Numbering Plan meet the tests set out in sections 60(2) and 49(2) of the Act being:
- **objectively justifiable**, it is Ofcom’s general duty in administering numbers to ensure their best use. We have identified a potential scarcity of RIDs to allocate to CPs. We therefore consider that the proposals would further best use of numbers by ensuring the long-term availability of RIDs to meet CPs’ needs, so that they can provide services to consumers, and to further competition, consumer choice and innovation;
 - **not unduly discriminatory**, for the following reasons:
 - i) all CPs eligible to apply for telephone numbers would be subject to the proposed modifications to the Numbering Plan;
 - ii) all CPs would need to adjust their administrative systems to recognise and handle RIDs in a three character alphanumeric format; and
 - **proportionate**, it is our duty to ensure that sufficient and appropriate telephone numbers (including administrative codes) are available to support competition and innovation in fixed-line voice and broadband services across the UK for the foreseeable future.

The proposed modification to the Numbering Plan would contribute to the meeting of our duty set out above by ensuring that sufficient RIDs are available to meet CPs’ needs; and
 - **transparent**, in that the Notification proposing the modifications to the Numbering Plan, and its effects, are set out in this consultation document.

- 3.33 We consider that we are fulfilling our general duty as to telephone number functions as set out in section 63 of the Act in making the proposed modifications by:
- securing the best use of the appropriate numbers to identify CPs; and
 - ensuring these numbers are allocated in the most efficient way,
- 3.34 We consider that our proposal to modify the Numbering Plan is consistent with our general duties in carrying out our functions as set out in section 3 of the Act. In particular, we consider that the proposal would further the interests of citizens in relation to communications matters and consumers in relevant markets by facilitating the harmonisation of switching processes and by ensuring that the supply of RIDs can more accurately identify the CP placing an order. This would help the CP losing a customer through an Erroneous Transfer or a slam to identify the provider who has placed the order.
- 3.35 In proposing the modifications to the Numbering Plan, we have also considered the Community obligations set out in section 4 of the Act, particularly the requirement to promote the interests of all persons who are citizens of the European Union. Taking measures to ensure there are sufficient RIDs to meet the demand from existing CPs and new entrants would thereby promote competition, choice and innovation, which is in the interests of all citizens.

Notification of modifications to the Numbering Plan

- 3.36 The notification of the proposed modification to the Numbering Plan is set out in Annex 3 of this consultation document. The notification and proposed changes to the Number Plan reflect our preferred option (Option 2 above).

Question 5: Do you have any comments on the proposed modifications to the Numbering Plan set out in Annex 3?

Section 4

Summary of proposals and next steps

- 4.1 We have explained, in the preceding sections of this document, the potential need to change the format of RIDs to increase the supply and thereby ensure that there are sufficient codes available to meet CPs' demand.
- 4.2 We have looked at options for intervention and our preferred approach, on which we are consulting, is to modify the Numbering Plan in order to:
 - Extend the format of RIDs to a three character alphanumeric code.

Consultation process and next steps

- 4.3 This consultation closes on 28 November 2014. We are seeking responses to the specific consultation questions set out in the document (see Annex 2) as well as general comments on our proposals.
- 4.4 Details on how to respond to this consultation are provided in Annexes 4 to 6.
- 4.5 Once this consultation has closed, we will take account of all submissions received and then reach a decision.
- 4.6 We plan to publish the statement and the revised Numbering Plan in Spring 2015.

Annex 1

Legal Framework

A1.1 Ofcom regulates the communications sector under the framework established by the Act. The Act provides, among other things in relation to numbering, for the publication of the National Telephone Numbering Plan (the 'Numbering Plan') and the setting of General Conditions of Entitlement relating to Telephone Numbers ('Numbering Condition'). It also sets out statutory procedures governing the modification of the Numbering Plan and any General Conditions.

The Numbering Plan

A1.2 Section 56(1) of the Act states that:

"It shall be the duty of OFCOM to publish a document (to be known as "the National Telephone Numbering Plan") setting out-

- a) the numbers that they have determined to be available for allocation by them as telephone numbers;
- b) such restrictions as they consider appropriate on the adoption of numbers available for allocation in accordance with the plan; and
- c) such restrictions as they consider appropriate on the other uses to which numbers available for allocation in accordance with the plan may be put."

A1.3 The Act provides for Ofcom to review and revise the Numbering Plan. Section 56(2) states that: "It shall be OFCOM's duty –

- a) from time to time to review the National Telephone Numbering Plan; and
- b) to make any modification to that plan that they think fit in consequence of such a review; but this duty must be performed in compliance with the requirements, so far as applicable, of section 60."

A1.4 Section 60 of the Act provides for the modification of documents referred to in the Numbering Conditions (which includes the Numbering Plan) and explains the procedures to be followed in order to conduct this review. Section 60(2) of the Act provides that:

"OFCEM must not revise or otherwise modify the relevant provisions unless they are satisfied that the revisions is –

- a) objectively justifiable in relation to the matter to which it relates;
- b) not such as to discriminate unduly against particular persons or against a particular description of persons;
- c) proportionate to what the modification is intended to achieve; and d) in relation to what is intended to achieve, transparent."

A1.5 Section 60(3) further provides that:

“Before revising or otherwise modifying the relevant provisions, OFCOM must publish a notification –

- a) stating that they are proposing to do so;
- b) specifying the Plan or other document that they are proposing to revise or modify;
- c) setting out the effect of their proposed revisions or modifications;
- d) giving their reasons for making the proposal; and e) specifying the period within which representations may be made to OFCOM about their proposals.”

Ofcom’s general duty as to telephone numbering functions

A1.6 Ofcom has a general duty under section 63(1) of the Act in carrying out its numbering functions:

“a) to secure that what appears to them to be the best use is made of the numbers that are appropriate to use as telephone numbers; and

b) to encourage efficiency and innovation for that purpose.”

A1.7 The principal duty of Ofcom to be observed in the carrying out of its functions is set out in section 3(1) of the Act as the duty:

“a) to further the interests of citizens in relation to communications matters; and

b) to further the interests of consumers in relevant markets, where appropriate by promoting competition.”

Duties for the purpose of fulfilling Community obligations

A1.8 In addition to our general duties and our duty regarding telephone numbers, Ofcom must also take into account the six Community requirements in carrying out its functions as set out in section 4 of the Act. These include the requirement to promote competition in the provision of electronic communications networks and services, as well as the requirement to promote the interests of European citizens.

Annex 2

Consultation questions

Question 1 – What is your estimate of the number of RIDs that will be required by your downstream CPs who contract with end users, at the harmonisation date of 20 June 2015?

Question 2 – What is your estimate of the total number of RIDs that will be required by the industry at the harmonisation date of 20 June 2015? On what basis have you reached this estimation?

Question 3a – Do you agree with our proposal to increase number of RIDs by changing the format of the code to a three character alphanumeric code, as per option 2?

Question 3b – Please provide us with an indication of the scale of costs that Options 2 and 3 would entail.

Question 4 – Are you aware of any other administrative purposes for which a three character alphanumeric code might be required or useful?

Question 5: Do you have any comments on the proposed modifications to the Numbering Plan set out in Annex 3?

Annex 3

Notification of proposed modification to the provisions of the Numbering Plan under section 60(3) of the Act

1. In accordance with section 60 of the Act, Ofcom proposes to modify the provisions of the Numbering Plan.
2. The draft modifications to the Numbering Plan are set out in the Schedule to this Notification.
3. Ofcom's reasons for making these proposals, and the effect of the proposed modifications, are set out in the accompanying consultation document.
4. Ofcom considers that the proposed modifications comply with the requirements of section 60(2) of the Act.
5. In making these proposals, Ofcom has considered and acted in accordance with their general duty as to telephone numbering functions under section 63 of the Act, their general duties under section 3 of the Act and the six Community requirements set out in section 4 of the Act.
6. Representations may be made to Ofcom about the proposed modifications by **28 November 2014**.
7. If implemented, the modifications shall enter into force on a date to be specified in Ofcom's final statement in relation to these proposals.
8. In this Notification:
 - a. "the Act" means the Communications Act 2003;
 - b. "the General Conditions of Entitlement" means the general conditions set under section 45 of the Act by the Director General of Telecommunications on 22 July 2003, as amended from time to time;
 - c. "Ofcom" means the Office of Communications; and
 - d. "Numbering Plan" means the National Telephone Numbering Plan published by Ofcom pursuant to section 56(1) of the Act, and amended from time to time.
9. Words or expressions shall have the meaning assigned to them in this Notification, and otherwise any word or expression shall have the same meaning as it has in the Act.
10. For the purposes of interpreting this Notification: (i) headings and titles shall be disregarded; and (ii) the Interpretation Act 1978 shall apply as if this Notification were an Act of Parliament.
11. The Schedule to this Notification shall form part of this Notification.

A handwritten signature in black ink, appearing to read 'Brian Potterill', with a long horizontal flourish extending to the right.

Brian Potterill

Director Competition Policy

27 October 2014

A person authorised by Ofcom under paragraph 18 of the Schedule to the Office of Communications Act 2002.

SCHEDULE

The following changes shall be made to the 'Definitions and Interpretation' section and Part A of the Numbering Plan. The changes are set out in bold.

Definitions and Interpretation

'Reseller Identification Code' means a three-character ~~alphabetic~~ **alphanumeric** Administrative Code (e.g. 'AAB'; '**99Z**') that is Adopted or otherwise used to identify a reseller of BT's wholesale services;

Part A of the Numbering Plan

A4: Administrative Codes	
Number(s)	Designation
000 to 999 inclusive	Communications Provider Identification Codes
AAB to ZZZ 99Z inclusive	Reseller Identification Codes

Annex 4

Responding to this consultation

How to respond

- A4.1 Ofcom invites written views and comments on the issues raised in this document, to be made **by 5pm on 28 November 2014**.
- A4.2 Ofcom strongly prefers to receive responses using the online web form at <http://stakeholders.ofcom.org.uk/consultations/increasing-supply-rids>, as this helps us to process the responses quickly and efficiently. We would also be grateful if you could assist us by completing a response cover sheet (see Annex 3), to indicate whether or not there are confidentiality issues. This response coversheet is incorporated into the online web form questionnaire.
- A4.3 For larger consultation responses - particularly those with supporting charts, tables or other data - please email Nicola.Humphrey@ofcom.org.uk attaching your response in Microsoft Word format, together with a consultation response coversheet.
- A4.4 Responses may alternatively be posted or faxed to the address below, marked with the title of the consultation.
- Nicola Humphrey
Third Floor
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA
- A4.5 Note that we do not need a hard copy in addition to an electronic version. Ofcom will acknowledge receipt of responses if they are submitted using the online web form but not otherwise.
- A4.6 It would be helpful if your response could include direct answers to the questions asked in this document, which are listed together at Annex 2. It would also help if you can explain why you hold your views and how Ofcom's proposals would impact on you.

Further information

- A4.7 If you want to discuss the issues and questions raised in this consultation, or need advice on the appropriate form of response, please contact Nicola Humphrey on 020 7981 3937.

Confidentiality

- A4.8 We believe it is important for everyone interested in an issue to see the views expressed by consultation respondents. We will therefore usually publish all responses on our website, www.ofcom.org.uk, ideally on receipt. If you think your response should be kept confidential, can you please specify what part or whether

all of your response should be kept confidential, and specify why. Please also place such parts in a separate annex.

- A4.9 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and will try to respect this. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A4.10 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's approach on intellectual property rights is explained further on its website at <http://www.ofcom.org.uk/terms-of-use/>

Next steps

- A4.11 Following the end of the consultation period, Ofcom intends to publish a statement in Spring 2015.
- A4.12 Please note that you can register to receive free mail Updates alerting you to the publications of relevant Ofcom documents. For more details please see: <http://www.ofcom.org.uk/email-updates/>

Ofcom's consultation processes

- A4.13 Ofcom seeks to ensure that responding to a consultation is easy as possible. For more information please see our consultation principles in Annex 2.
- A4.14 If you have any comments or suggestions on how Ofcom conducts its consultations, please call our consultation helpdesk on 020 7981 3003 or e-mail us at consult@ofcom.org.uk . We would particularly welcome thoughts on how Ofcom could more effectively seek the views of those groups or individuals, such as small businesses or particular types of residential consumers, who are less likely to give their opinions through a formal consultation.
- A4.15 If you would like to discuss these issues or Ofcom's consultation processes more generally you can alternatively contact Graham Howell, Secretary to the Corporation, who is Ofcom's consultation champion:

Graham Howell
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA

Tel: 020 7981 3601

Email Graham.Howell@ofcom.org.uk

Annex 5

Ofcom's consultation principles

A5.1 Ofcom has published the following seven principles that it will follow for each public written consultation:

Before the consultation

A5.2 Where possible, we will hold informal talks with people and organisations before announcing a big consultation to find out whether we are thinking in the right direction. If we do not have enough time to do this, we will hold an open meeting to explain our proposals shortly after announcing the consultation.

During the consultation

A5.3 We will be clear about who we are consulting, why, on what questions and for how long.

A5.4 We will make the consultation document as short and simple as possible with a summary of no more than two pages. We will try to make it as easy as possible to give us a written response. If the consultation is complicated, we may provide a shortened Plain English Guide for smaller organisations or individuals who would otherwise not be able to spare the time to share their views.

A5.5 We will consult for up to 10 weeks depending on the potential impact of our proposals.⁸

A5.6 A person within Ofcom will be in charge of making sure we follow our own guidelines and reach out to the largest number of people and organisations interested in the outcome of our decisions. Ofcom's 'Consultation Champion' will also be the main person to contact with views on the way we run our consultations.

A5.7 If we are not able to follow one of these principles, we will explain why.

After the consultation

A5.8 We think it is important for everyone interested in an issue to see the views of others during a consultation. We would usually publish all the responses we have received on our website. In our statement, we will give reasons for our decisions and will give an account of how the views of those concerned helped shape those decisions.

⁸ We are consulting for one month. We consider this an appropriate period for the consultation as this is a '[Category 3](#)' consultation, covering detailed technical issues with limited effect on a market. The statutory requirement in the Act is to consult for at least one month.

Annex 6

Consultation response cover sheet

- A6.1 In the interests of transparency and good regulatory practice, we will publish all consultation responses in full on our website, www.ofcom.org.uk.
- A6.2 We have produced a coversheet for responses (see below) and would be very grateful if you could send one with your response (this is incorporated into the online web form if you respond in this way). This will speed up our processing of responses, and help to maintain confidentiality where appropriate.
- A6.3 The quality of consultation can be enhanced by publishing responses before the consultation period closes. In particular, this can help those individuals and organisations with limited resources or familiarity with the issues to respond in a more informed way. Therefore Ofcom would encourage respondents to complete their coversheet in a way that allows Ofcom to publish their responses upon receipt, rather than waiting until the consultation period has ended.
- A6.4 We strongly prefer to receive responses via the online web form which incorporates the coversheet. If you are responding via email, post or fax you can download an electronic copy of this coversheet in Word or RTF format from the 'Consultations' section of our website at <http://stakeholders.ofcom.org.uk/consultations/consultation-response-coversheet/>.
- A6.5 Please put any parts of your response you consider should be kept confidential in a separate annex to your response and include your reasons why this part of your response should not be published. This can include information such as your personal background and experience. If you want your name, address, other contact details, or job title to remain confidential, please provide them in your cover sheet only, so that we don't have to edit your response.

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

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

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)