Comments on Ofcom's Consultation on Changes to Making Local Calls in Five Area Codes

by VON Europe, September 2013

Preliminary Remarks

The Voice on the Net Coalition Europe ('VON') welcomes the opportunity to comment on Ofcom's consultation on changes to making local calls in five area codes (hereafter 'the Consultation').

On the long term, VON encourages Ofcom to pursue a holistic approach towards numbering, an approach that fosters future technological and service innovations in further continuation of Ofcom's numbering policy. Such a holistic approach could for example be achieved by making all UK numbers (by analogy with the 03 range) UK-wide (as opposed to area-wide).

Numbers have been, are, and will remain, a critical resource for a wide range of communication services and applications. A well-designed and forward looking numbering plan is feasible: numbers are not intrinsically scarce; it is rather the way in which they are structured and managed that can artificially cause scarcity. Moreover, moving away from a copper-centric approach will bring consumer benefits and promote competition.

VON hence encourages Ofcom to adopt numbering principles and plans that are user-centric (*i.e.* technology- and service neutral) and take into consideration the reality of a switch to an all IP environment. Ofcom's approach should enable users to choose any of their number(s), keep any of their number(s) wherever they are and use any of their number(s) on the device(s) or services of their choice.

Detailed Remarks

VON considers that Ofcom should go beyond closing local dialling in these five areas, in order to ensure the ongoing availability of geographic numbers across the UK and to render the United Kingdom's numbering plan future-proof.

VON encourages Ofcom to pursue a holistic approach towards numbering, an approach that fosters future technological and service innovations. Such an approach could for example be achieved with the eradication of the linkage of area code and location by making all UK numbers (by analogy with the 03 range) UK-wide (as opposed to area-wide).

Other regulators have already come to the conclusion that only a holistic forward-looking approach could ensure a sustainable policy for numbers.

- The need for such a forward-looking perspective has been acknowledged as early as 2010 by the Swedish regulator PTS in a study on the future organisation of Sweden's numbering plan. In the study's conclusions, PTS stated that substantial changes needed to be made to the approach to numbering and the sooner, the better, as holding off major changes until the need arises to enforce them swiftly can bring along much higher costs than a well-thought out implementation over time.[1]

- The Australian regulator, the ACMA, presented an approach in its 2011 paper[2] on a coherent and inclusive medium to long term vision for numbering that could make Australia a frontrunner in putting in place a well-designed and forward looking numbering plan.

VON strongly encourages Ofcom to go down the same path of rethinking its approach to numbering and to take an approach that ensures the fullest possible retail price transparency and that removes the link between location information and geographic numbers.

Ofcom should enable users to choose any of their number(s), keep any of their number(s) wherever they are and use any of their number(s) on the device(s) or services of their choice. Such an approach to numbering plans is feasible: numbers are not intrinsically scarce; it is rather the way in which they are structured and managed that can artificially cause scarcity.

Moreover, **it will bring consumer benefits and promote competition**: VON observes that in the past decades, people have become more flexible and willing to move and travel at the spur of the moment. Today's consumer is increasingly nomadic. Mobile phones are overtaking fixed phones[3] for voice, and calling your plumber happens more often than not on his mobile phone. In parallel, people divert their fixed phones (*i.e.* call forwarding), or even abandon them to exclusively use their mobile phones.

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[1] See PTS. (2010). *Behov av en framtidsinriktad telefoninummerplan. 6 olika förändringsalternativ. Det fortsatta arbetet* [Need for a Future-Oriented Telephony Numbering Plan. Six Different Change Options. Next Steps] [PTS-ER-2010:20]. Stockholm: PTS. Retrieved at, http://www.pts.se/upload/Remisser/2010/10-8918-remiss-rapport-100929.pdf. p. 67.
[2] See ACMA. (2011a). *Telephone Numbering: Future Directions Paper*. Retrieved at, http://www.acma.gov.au/webwr/_assets/main/lib100283/numbering-future_directions.pdf.
[3] See for example tables 1.24 (p. 51), 1.25 (p. 52) and figures 1.21 (p. 52), 1.23 (p. 53) in Leckner, S., & Facht, U. (2010). *A Sampler of International Media and Communication Statistics 2010* [Nordic Media Trends 12]. Göteborg: Nordicom. Retrieved at, http://www.nordicom.gu.se/common/publ_pdf/NMT12.pdf

Today, the relevance of the geographic significance associated to numbers is thus fading.

When looking at the behaviour of Australian consumers, the ACMA has concluded in its Research into consumer behaviours and attitudes towards telecommunications numbering and associated issues to that *"the capacity of a mobile phone to store numbers and then display them as a name had also changed how many participants remember and use numbers"*.[4] It is also being remarked that the *"increasing number of communication gateways available (…) diminished the importance of, and level of dependence on, any particular service and consequently any particular phone number"*.[5] Furthermore, the changing behaviour of consumers regarding numbers and communication identifiers is influenced through advances in applications and services, as well as devices: people are getting more and more accustomed to the use of user names or IDs through the use of online applications and services.[6]

VON therefore urges Ofcom to swiftly adopt a vision that goes beyond what the Electronic Communications Committee (ECC), part of the European Conference of Postal and Telecommunications Administrations (CEPT), describes in its 2010 Report on the Evolution of Geographic Numbers (hereafter 'the ECC Report')[7] as:

> *"The design of NGNs* [Next Generation Networks] *implemented today is very much 'PSTN on IP based networks' with the features and restrictions of the PSTN being copied."*

The ECC Report[8] actually identifies multiple benefits associated to the removal of all constraints regarding geographic information in the numbering plan, namely:

1. It would allow a more innovative use of geographic numbers;
2. It decreases the possible barriers of entry for new parties in the telephony market;
3. It gives consumers the option to keep their number when they are moving; and
4. It allows a more efficient use of numbering resources.

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[4] See ACMA. (2011b). *Community Research Into Consumer Behaviours and Attitudes Towards Telecommunications Numbering and Associated Issues*. Retrieved at,
http://www.acma.gov.au/webwr/_assets/main/lib312144/numbering_4_research_report.pdf. p. 9.
[5] See ACMA. (2011b). *Ibid*. p. 10.
[6] See ACMA. (2011b). *Ibid*. p. 28.
[7] See ECC. (2010). *Evolution of Geographic Numbers* [ECC REPORT 154]. Luxembourg: CEPT. Retrieved at,
http://www.erodocdb.dk/Docs/doc98/official/pdf/ECCREP154.PDF. p. 24.
[8] See ECC. (2010). *Ibid.* p. 17-19.

The ECC Report[9] also remarks that the removal of geographic information could have wider benefits than a mere efficiency increase, as it would also allow the introduction of wider area location portability, a possibility that is very appealing in a society where both businesses and individuals become more and more mobile.

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We thank you in advance for taking consideration of these views. Feel free to contact Herman Rucic, VON Europe, by phone ✂   or email ✂   should you need further information.

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About the VON Coalition Europe

The Voice on the Net (VON) Coalition Europe was launched in December 2007 by leading Internet communications and technology companies, on the cutting edge to create an authoritative voice for the Internet-enabled communications industry. Its current members are Google, Microsoft, Skype, Viber, Vonage, Voxbone and WeePee.

The VON Coalition Europe notably focuses on educating and informing policymakers in the European Union and abroad in order to promote responsible government policies that enable innovation and the many benefits that Internet voice innovations can deliver.

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[9] See ECC. (2010). *Ibid*. p. 2 and 10.