

**Title:**

Mr

**Forename:**

Alistair

**Surname:**

Knox

**Representing:**

Organisation

**Organisation (if applicable):**

Technology & Communication Services

**Email:**

ajknox@tecose.com

**What do you want Ofcom to keep confidential?:**

Keep nothing 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?:**

Generally yes, although I believe the assessment given of consumer confusion between 070 numbers and mobile numbers is on the low side. I also believe that the

very high number of pricing bands that some communication providers have for calling 070 numbers is a significantly complicating factor.

**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?:**

Yes.

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

Yes.

**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.

**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?:**

Possibly - for business users, as complying with the resulting requirements this might prove difficult for those individual personal users of 070 numbers who are using those numbers because they are resident outside the UK.

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

Yes - CLI is an important facility.

**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.:**

Yes, they should - these services are clearly forms of premium rate service and consumers should understand this when calling such services. However, there may be some compliance issues with Trader Media, in that the multiple end users of these numbers are only using them temporarily, whilst their advertisement is "live".

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

Yes. Apart from the interference with automate systems, such announcements are of considerable annoyance, both to callers and those being called.

**Additional comments:**