

Elizabeth Greenburg
4th Floor
Competition Group
Ofcom
Riverside House
2A Southwark Bridge Road
London
SE1 9HA

Response by Magrathea to Ofcom's Consultation on Geographic Telephone Numbers

Magrathea welcomes the opportunity to comment on this further consultation on measures to conserve geographic numbers. We set out our comments in the paragraphs below.

Section 3 - Closing local dialling in Bournemouth

We have no objections to Ofcom closing local dialling in Bournemouth on 1 November 2012 and we look forward to receiving more details in respect of the technical implementation.

Section 4 - Charging for geographic numbers

We agree in principle with Ofcom's proposal to charge for geographic numbers in certain specified pilot areas. Charging for numbers in areas with the fewest numbers remaining to be allocated is, in principle, a sensible way to incentivise efficient use of numbers and number blocks.

Ofcom says that it is unwilling to allow CPs to return blocks of less than 1,000 numbers, as these would not be able to be reallocated to other CPs (paragraph 4.33). Instead, Ofcom would like CPs either to endeavour to achieve greater utilisation of their own number blocks or, with Ofcom's assistance, to transfer their under-utilised number blocks to another CP.

We are concerned that this might not always be possible, for instance if those CPs who are willing to take on additional number blocks have already done so for one or more CPs. The capacity of larger CPs to utilise additional number blocks will not be infinite, even in areas with a scarcity of numbers.

If a CP is unable to transfer an under-utilised number block to another CP, this will force the CP to pay for those numbers whilst doing nothing to achieve Ofcom's objective of delaying the use of number supply measures. We therefore believe a possible, though unwelcome, outcome will be that some smaller CPs may choose to give back an entire 1,000-number block and force the few customers allocated within that block to renumber. This outcome could be avoided if Ofcom agreed to accept the return of 100-number blocks, to be placed in reservation.

We welcome Ofcom's assurances that they will not extend the specified areas for number charging without further consultation as we believe it is important to monitor and evaluate the effect of this new regime on CPs and end users before extending it.

Section 5 - Allocation of 100-number blocks

We have no objection to Ofcom making 100-number blocks available in the 11 five digit area codes.

Annex 3

We do not object to Ofcom's approach for ported and WLR numbers.

Annex 4

We have no comments on the proposed administrative arrangements for number charging in the pilot scheme.

25th April, 2012