



Stamatia Papadopoulou
Ofcom
Riverside House
2A Southwark Bridge Road
LONDON
SE1 9HA

6th January 2014

By e-mail

Reference: Telephone number application form. Proposed modifications to the telephone number application forms within existing numbering policy (the "Consultation")
NON-CONFIDENTIAL

Dear Stamatia,

Gamma Telecom Holdings Limited ("Gamma") welcomes the opportunity to respond to this consultation published on 18th December 2013; our confidential response is appended.

Introduction

Gamma is a Network Operator that provides wholesale fixed and mobile telephony and data services, mainly to resellers who sell to the Small to Medium Enterprise sector throughout the UK. Gamma has a turnover c£145m per annum.

This consultation response relates to Gamma Telecom Holdings Limited and does not necessarily represent the views of our reseller subsidiary Gamma Business Communications Limited (formerly incorporated as Uni World Communications Limited) and our network specialist subsidiary, Gamma Network Services Limited (formerly incorporated as Varidion Limited). It does not represent the views of any other group company unless otherwise expressly stated. Any conflict between the implied position of Gamma in any UK Competitive Telecommunications Association (UKCTA),

Internet Telephony Services Providers Association (ITSPA) or Federation of Communication Services (FCS) responses is accidental and we consider that our views in this response should prevail.

Given the limited scope of the consultation we have chosen to respond in general terms. Gamma trusts that this response addresses the questions posed by Ofcom and would welcome the opportunity to elaborate on any points in more detail if required. Please don't hesitate to contact me, Peter Farmer (✂, address as per letter head), for further detail in the first instance.

General Comments

Gamma welcomes Ofcom's initiative to make number applications on-line and to streamline the process. We believe that Ofcom has discharged the relevant legal duties through this Consultation.

However, we would like to make the following points;

- [✂]. The implementation of any new system or substantial change can generate risks [✂] we would want to avoid. We would therefore suggest that a period of parallel running is introduced where the old forms can be used alongside the new system voluntarily; the Consultation implies (possibly by virtue of the legal conditions) that it would be a hard switchover.
- We would not expect to complete network information (Annex A1 of the existing form) demonstrating we are a PECN for each application, or even on the first one, as this was already supplied and is an unnecessary administrative burden to update.
- The Consultation implies that a Public Electronic Communications Service ("PECS") can still be allocated numbers from the National Telephone Numbering Plan. [✂]. Greater clarification of this would be appreciated as the Consultation's headline is no change to existing policy.
- The Consultation implies adding a Declaration that the resources would be adopted within 6 months; the current form requires submission no more than 6 months before in service date. Whilst these are commensurate statements when considering the definition of Adoption in Part 1 of the General Conditions of Entitlement, greater clarity on what the policy position actually is would be appreciated in the final Statement for the avoidance of doubt.
- National Scale operators that act as the "nominated representative" for multiple Public Electronic Communications Networks and PECS need to be considered in the system and process design; for example, I am the "nominated representative" for a fair few such

entities, both within Gamma and outside; I have only 1 email address for example and don't particularly want to manage umpteen logins etc.

- The Consultation appears to cover in detail the process for the application of new resources, but doesn't consider novations/transfers, returns, or other exceptional situations that may arise; we assume that these can continue to be handled [X] as they are today.
- Presently, our utilisation information can be cut and pasted from our own reports into the form; we expect this ability to continue to avoid an onerous burden in applying for ranges in areas where we have many ranges with differing utilisations, or be able to simply show them at a global level for that area without separating them out.
- Ofcom currently protect and reserve blocks in certain areas that are notionally free for allocation to avoid issues such as "cherry picking" and to keep whole D digits preserved. This is currently handled in applications where the administrative process of releasing more numbers in the published data hasn't caught up with demand by applying for ANY/ANY under the DE and F digits in the form, or applying outright for numbers we know are protected for this reason but likely to be freed up on demand. This "flexibility" is an important consideration with automated systems and validation.

In conclusion, Gamma is supportive of the initiative and hopes that the above constructive feedback helps inform a successful implementation.

Yours sincerely,

[X]

Peter Farmer
Commercial and Regulatory Manager
Gamma Telecom Holdings Limited