

What do you want Ofcom to keep confidential?:

Keep name 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?:

Yes

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?:

Yes

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 in normal use. If it is barred on 070 then it follows that it also should be barred from many other services. There are better, more generic, ways to deal with such scams e.g. the introduction of Call Price Labelling, so that callers can immediately check the call price and decide whether to pay for a return call.

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, Premium rate services that are not "personal number services", and which do not allow flexible call forwarding under the "ownership" and control of the ultimate end-user, should be distinguished from Personal Numbers by use of a different number range.

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

No, I broadly believe that "pre-call" announcements can be designed to be efficient and with minimal delay or interruption, and hence with no quantifiable increase in risk to public safety.

To clarify, such pre-call announcements should not precede connection of the call, but should take place during connection, as implemented in the excellent 1899 service (www.1899.com), allowing callers to minimise their call duration as desired or to disconnect before completion of connection in the majority of cases.

Additional comments: