

Response From Citrus Telecom

Dear Ofcom

After meeting with Carole and Laurence and later reading the consultation document I would like to express my views that seem to be shared by others.

In this, my first contact, I would like to focus on what is probably the most contentious part of the proposed changes to numbering policy; the proposed charging for number ranges outlined in "policy Proposals" 1.23, 1.24, and 1.25. This is a crude measure that does little to resolve the issue of number availability and simply taxes the owner of the number range and is yet another tax on business and an administrative overhead addition.

It is the licensing and accessibility to number ranges that is the issue, the deregulation process I feel was mismanaged. I would suggest that the only way to manage number ranges is to restrict the issuing of ranges to interconnected network operators only. Obviously this will cause issues to those companies with hosted number ranges however this is an inherited problem due to past mistakes in planning. Perhaps a process of transferring ownership to the hosting companies over time could provide a bearable solution to all concerned.

VoIP/SiP technology has certainly exacerbated the problem of number usage and there is an accelerating number of companies purchasing SiP servers and applying for ranges and this can only worsen the situation. It is currently relatively easy for them to create a winning argument to obtain number ranges and this will continue to grow with obvious consequences. The proposed charges for number ranges will be easier for these small non network owning new companies as they would be able to select very specifically which number ranges they apply for and control costs however the network operators with existing number ranges will find this impossible as us, like many others, will inevitably have large blocks with a utilization profile that would prevent the handing back of portions of the blocks. The result will be the inability to efficiently manage costs on the same basis as new entrants.

If the issuing of number ranges were to be restricted to interconnected operators only, then the multitude of non interconnected providers could easily obtain numbers required on an as needed basis from a network operator, and for the operator to hand traffic to the provider's equipment is a simple process. This would really achieve efficient usage of number ranges as it would dramatically reduce the number of new applicants as well as then increase the percentage usage of already issued number ranges of the network operators. This surely produces the greatest efficiency gains without unfairly and more importantly, unequally taxing network operators and service providers. I would imagine that it would also prevent the predictable legal action that certain network operators could instigate.

Regards