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BT'S RESPONSE TO OFCOM'S CONSULTATION "CONSERVING GEOGRAPHIC NUMBERS"

BT would welcome any comments on the contents of this document which is also available electronically at <http://www.btplc.com/responses>

Comments should be addressed to Howard Erdunast, BT Group Regulatory Affairs Department, pp C81, BT Centre, 81 Newgate Street, London EC1A 7AJ, or by e-mail to howard.erdunast@bt.com.

BT RESPONSE

1. Given Ofcom's analysis of the rate of recent geographic number block allocations, BT supports Ofcom's proposal to assign conservation status to the remaining 4-digit area codes as set out by Ofcom. BT offers no view in relation to the Guernsey and Jersey numbering ranges. This means that Ofcom will allocate all future numbering with dialling codes of the format 01XXX(X) (except Jersey and Guernsey ranges) to communications providers in units of 1,000 (1k) numbers rather than 10,000 (10k) numbers.
2. Regarding numbering with dialling codes in the format of 01X1, 011X and 02X, BT supports Ofcom continuing to allocate these in blocks of 10k.
3. BT is encouraged by the constructive dialogue with Ofcom on issues regarding the management of geographic numbers. We have a shared objective to ensure that supply can meet demand, in particular for new entrants and innovative services, in a manner that minimises the impact on decode resource in the network. Taking appropriate action now may reduce the risk of Ofcom needing to undertake other more dramatic measures to increase supply in future, such as introducing overlay codes. With this in mind, BT would make the points set out below.
4. Decode resource on switches is finite. Whilst BT believes that it can support Ofcom's current proposals, given current demands on the network, it is important that Ofcom minimises the number of 10k blocks that is split into 10 X 1k blocks. As such, we would ask that 1k, allocations where higher demand is unlikely are allocated from the same 10k block. Where it is likely that a provider will go on to need more than a single 1k block in an area, based on historic usage, then, broadly speaking, unused numbering in the same 10k block should be protected for that company's use, subject to being able to meet all other providers' reasonable demands from remaining stock. Clearly, in extreme cases of need, it may not be possible for that protection to be maintained. This approach should be reflected in any exercises to recover unused 1k blocks of numbers from 10k allocations.
5. The practice of reducing the unit of allocation of numbers from 10,000 to 1,000 should not be extended further into non-geographic ranges. Non-geographic numbers are plentiful, and any such step change would be likely to have a significant impact on BT's ability to continue to support 1,000 number allocations in the geographic numbering space. BT would welcome Ofcom's reassurance that this will not be considered, so that priority can be given to minimising the likelihood and potential number of geographic areas where an overlay code would be needed. Whilst BT believes that overlay codes would be less disruptive for customers than, for example, further number changes, their potential impact should not be under-estimated.

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