

**DRAFT five**  
**Cover sheet for response to an Ofcom consultation**

**BASIC DETAILS**

**Consultation title:** **Telephone Numbering**

<http://www.ofcom.org.uk/consult/condocs/numberingreview/>

**To (Ofcom contact):** Andy Montaser  
NumberingReview@ofcom.org.uk

**Deadline** 13 May 06

**Name of respondent:** David Harrington

**Representing (self or organisation/s):** Communications Management Association ('CMA')

**Address (if not received by email):**

**CONFIDENTIALITY**

**What do you want Ofcom to keep confidential?** **Nothing**

**DECLARATION**

We confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on an Ofcom website, unless otherwise specified on this cover sheet, but all intellectual property rights in the response vest with CMA. If we have sent our response by email, Ofcom can disregard any standard email text about not disclosing email contents and attachments. Ofcom can publish our response on receipt.

[www.thecma.com](http://www.thecma.com) CMA is an association of ICT Professionals from the business community in both private and public sectors. It is a registered Charity over 45 years old, totally independent and without supplier bias. It is run by the members, for the members and aims to Influence regulation and legislation, provide education and training and disseminate knowledge and information, for the public good. CMA's contribution to public consultations is generated via the process described in a footnote to this document.

## The CMA Response to the Telephone Numbering Consultation

### Summary

This response is made primarily from the viewpoint of the business user of telecoms goods and services, rather than from the perspective of the domestic, single-line consumer. However enterprises (as represented by CMA) have no wish to embrace proposals that could be inimical to their communications with their customers; and all CMA members are “citizen consumers” and so take an interest in Ofcom’s proposals.

Our main points are summarised as:

- We do not understand why the two main principles underpinning the existing NNP - an 11 digit numbering scheme and the use of Wide Area Codes (WACs) for geographic expansion – appear to have been thrown overboard. However, we have recently been given cause to believe that some, if not all, the reservations and protections to allow WACs have been released and therefore WACs would seem to be back on the agenda – if this is correct, we must amend our comment; if only to register surprise that this should happen before the consultation has closed.
- Nevertheless, without clarification of the reasons for a change in strategy, the main thrust of Ofcom’s proposals (aimed at meeting forecast shortages in some 34 geographical areas and improving tariff transparency via a limited, logical re-structuring of the National Numbering Plan) must reluctantly be supported. However, we have some comments on the detailed proposals. (Q1, Q17)
- CMA has long campaigned for free-to-the-caller [tariff pre-announcements](#). If pre-announcements are not going to be mandated by the regulator then the importance of improving tariff transparency, clarity and acuity via a logical restructuring of the NNP is thrown into high relief.
- The rationale behind opening up the 03 range nationally for enterprise and government use is not fully understood. It is unlikely to be successful without the offer of [real incentives](#) to move from the 08 range. Similarly it removes the expansion of wide area numbering into the sixteen or so areas originally drawn up and where protection is currently applied
- If the 03 range is to be opened, business users would prefer to be allowed to [choose numbers](#) from the range directly from an Ofcom-appointed numbering manager. In this situation there would be little objection to a numbering rental or purchase regime. However, the issue of “numbering rights” – akin to spectrum rights in a liberalised market – must also be addressed and clarified.
- Unless the roll-out plans for the NGN eliminate the risk of running out of numbers in the 34 geographic areas it proposed to introduce overlay codes as a fall-back. CMA is strongly opposed to [overlay codes](#) in that they are confusing, they lack flexibility and transparency and are inherently anti-competitive for local enterprises.
- CMA is uncertain of the need for the proposed use of the [06 range](#), which might be better utilised (with 04 and 05) as a reserve range.
- We cannot be complacent about the beneficial impact that the [NGN](#) will have on demand for numbers.

- Consideration must be given to introducing the need for a [PIN](#) when accessing the higher codes in the 09 range.
- CMA would like Ofcom to investigate the possibility of dialing [freefone](#) numbers (080) from outside the UK.
- Based on experience of the impact of the National Code Change we believe that it is possible to [over-emphasise](#) the risk of a negative reaction to the proposals from the consumer. Even small companies replace their notepaper regularly and the UK use of parallel running prevents undue disturbance. And we are, of course, talking about a change to the code, rather than withdrawal of the citizen-consumer's existing number and replacement with a completely different new one.
- Unless Ofcom is prepared to spend a significant amount on [advertising](#) the changes there will be no transparency or clarity in the revised NNP and the effort expended in rationalizing the ranges will have been largely wasted.
- A clear, concise Code of Practice on [number layout](#) and format on business documents and signboards is needed.
- **Overall, CMA believes that there is sufficient concern about the route that Ofcom has chosen to put the current consultation on hold while further, detailed information is released on scenarios for exhaustion/relief, which would highlight parts of the country where an 02/03 may never be necessary to address exhaustion, despite its attractiveness to simplify citizen-consumers' calling patterns and usage. CMA also recommends that before any decisions are taken, further research should be undertaken into callers' preferences for the tariff significance of number ranges.**

### Some General Points (Q17)

(Note: the questions from the condoc are copied at the end of this response to help the reader avoid the need to switch between documents)

In very general terms, we base our response on eight principles for any numbering scheme. The principles were developed and agreed with Oftel over ten years ago and still hold good today: Any scheme should:

- 1 be long-term and balanced
- 2 have support from the industry (operators, users and the regulator)
- 3 have a coherent, clear and published strategy
- 4 be capable of adequate management (not mere administration)
- 5 not constrain future developments
- 6 not forget Europe
- 7 not be anti-competitive to TOs
- 8 not be anti-competitive to users.

Ofcom's proposals represent a major shift in the philosophy of number management. The main thrust of the 11 digit scheme was to acknowledge that forecasting the impact of technical and commercial changes on the numbering stock is not a practicable proposition. It overcame this stumbling block by:

- Underpinning a scheme that is sufficiently flexible for any outcome (for example, we all have mobile numbers, we all have personal numbers, we all have VoIP numbers, VoIP needs lots of geographic numbers, etc);
- Implementing a numbering scheme with a great deal of space;
- Permitting the management of the scheme as if the supply of numbers is limitless – so while in the end, numbering is a scarce resource, there is no need to manage it as a scarce resource.

The 11 digit concept gives us lots of space to do this and the Wide Area scheme is the way geographic ranges can be regarded as “limitless”. Abandoning these principles without due cause seems somewhat reckless, especially since Ofcom seems to be proposing, in lieu of the previous strategy, micro-forecasting of each Area Code and micro-management of the limited space in some 01 areas by imposing 1000 block routings. It is not true that high utilisation is good and low utilisation bad: in fact, it can be argued that the opposite is the case. Low utilisation is inevitable in an 11 digit scheme, but allows it to be managed as if it is limitless. And instead of opening up new numbering opportunities to meet market demand (as happened with personal numbering and VOIP), Ofcom appears to have abandoned that approach in favour of opening new primary ranges on 03 and 06 without any evidence of market demand.

**To summarise, number shortages in some areas seem to have provoked Ofcom to abandon tried and true policies and to step out into the unknown. CMA is worried that this approach is likely to have unfortunate long-term consequences and urges Ofcom to reconsider.**

## **Comment on Specific Issues**

### Pre-announcements on Tariffs (Q4, Q5, Q14)

CMA has consistently advocated the introduction of pre-announcements as a way of eliminating user uncertainty on the price of a call. As the draft report from the Electronic Communications Committee of the CEPT on “The Future of Numbering” states (para 11.4):

“NRAs need to recognize the importance of tariff issues to subscribers and to seek to reduce the number of occasions when calls cost more than expected. Because competition is leading to a diversity of tariff and call plans and to a migration from usage based charging to subscription based charging, NRAs should focus on maintaining transparent information on the maximum that a call to a number is likely to cost.”

However, no supplier has been willing to introduce free of charge pre-announcements, despite the lack of technical barriers to doing so and Oftel/Ofcom have been reluctant to support the consumer view. (Currently any announcement is in the charged call and appears to have been designed to generate revenue). CMA therefore accepts, as a poor second-best, Ofcom’s commitment to introduce transparency, clarity and, hopefully, better acuity in the way that Code ranges are used and we are trying to see this as a possibly effective alternative to pre-announcements. However, some of Ofcom’s proposals are not entirely consistent with this laudable aim and we believe that the set of proposals should be reviewed from the narrow and specific perspective of achieving tariff-transparency. In effect, this means that each proposal should be judged against a single criterion.

However, we retain doubts over the feasibility, or even the desirability, within the current regulatory framework of loading so much of the burden of tariff transparency on to the numbering plan. Our uncertainty stems from paras 5.91 and 5.92 in the condoc, where

5.91 refers to originating providers determining the price paid for any call, but 5.92 refers to communications providers choosing number ranges for their services, consistent with the prices to be paid, and this must mean terminating providers. The terminating SP chooses the number to be dialled (based on the impression it wants to give to callers and its own business model for calls), but the originating SP actually charges the caller at whatever mark-up it wants. This is not just a theoretical point - we already have big discrepancies in charges from mobiles, and can expect more such variations. Indeed, we are now seeing [moves by the Mobile Broadband Group to influence ICSTIS](#) in ways that appear to run counter to Ofcom's proposals for the Numbering Plan.

In addition, operator number portability (for both fixed and mobile access) will make life harder - currently calls to ported mobile numbers continue to be charged at the original rate, but this may well change. And we can expect more variation of charging rates during calls. We already have this on some DQ services which connect the caller directly to the requested number, and it is not hard to imagine an initial (say locally charged) message offering options of sales (free) or service (significantly charged). This sort of innovation should not be ruled out by the numbering plan.

**Overall, the only practical way ahead seems to be the introduction of free pre-announcements.**

#### Incentives to move to the 03 Range (Q8, Q9)

It is understood that the rationale for opening the 03 range to enterprises and government departments is based on a predicted shortage of numbers on the 08 range and increasing pressure on the 09 range. The choice of 03 (in preference to, say, 06) is predicated on the proximity of 03 to 01 and 02. 03 will be an NTS range and calls to 03 numbers will be charged at the national rate.

CMA's fundamental reaction to this proposal is that using 03 as a substitute for the 08 range is inimical to the Wide Area scheme and also prevents the use of 035 for Short dialling from Northern Ireland to the Republic (part of the Good Friday agreement).

Ofcom has already sensibly removed the reservations against the difficult 02-only 10 Area scheme. If Ofcom was now to choose the 15 Area scheme using 02 and 03 then more reservations could be removed and a great deal of space would be created.

CMA does not understand how Ofcom might insist that numbers in the 03 range are charged at geographic rates. We believe that charges would depend on the interconnect arrangements mirroring geographic.

CMA challenges the conventional wisdom regarding low take-up of 055 (Corporate Numbering). We doubt that it has been held back by block size, and we suspect that low take-up has been the result of telcos' decisions not to support it. We have consistently claimed that there is an underlying demand.

A comment from a large retail chain having a national footprint illustrates these reservations very well:

“(Name of Company) does have an interest in national rate NGNs which avoid either penalising our customers or ourselves, so we are interested in non-0870 or 0845 type numbers, but I agree fully that 03 seems a strange choice and have serious doubts that what we are seeking will be offered by Telcos.

“We are also constantly frustrated by the failure of NGNs to operate outside of the UK - even to RoI where we have a significant presence and need duplicate numbers which causes confusion and a management overhead”.

CMA therefore finds it difficult to support the Ofcom proposal to open 03 and we find it even more difficult to believe that enterprises will willingly choose to move from 08 to 03 unless there is a measure of compulsion, together with some incentive. If, despite our objections, Ofcom's proposals are to go ahead, all we can suggest is that that the

financial attractiveness of remaining on 08 should be progressively reduced, to a pre-announced timetable that would allow an enterprise to migrate at a time of its own choosing. The possibility of being able to choose numbers directly via the manager of the 03 range would be a powerful incentive to move (but see next paragraph). The application of a “consumer test” to those remaining on 08 after a pre-determined period should be considered.

**However, given the uncertainty of moving users en masse from 08 to 03 we are not clear that the dedication of the entire 03 range to this purpose can be justified.**

#### Choosing and Paying for Numbers (Q8, Q9, Q22)

We note that Ofcom has yet to study and pronounce on the matter of payment for numbers. We believe that enterprises would not object to paying a small sum for numbers from the 03 range provided that:

- Business users could choose their own numbers directly from the range without having to take numbers allocated from a supplier’s stock.
- There was a degree of certainty attached to such ownership – a clarification of the rights and responsibilities attaching to ownership would be required. For example, should a secondary market in 03 numbers be permitted? “Numbering Rights” might be an appropriate description.

#### The use of Overlay Codes (Q6)

Overlay codes deny local dialling to those on the new code. For businesses in the area, such as taxi firms, this is fundamentally anti-competitive in that their customers naturally prefer to remember and dial a 6-digit number. Overlay codes are inherently confusing to those in the affected area and they lack the sort of tariff transparency that Ofcom is seeking to provide.

However, if their use becomes inevitable, it will be essential to conduct a series of local consultations in the affected areas, inter alia, to avoid the inadvertent elimination of the prospect of wide-area codes.

In passing, it is useful to remind ourselves that 020 (3) was not and is not an Overlay and therefore tells us nothing about the acceptability of an Overlay.

It must be remembered that Wide Area codes give lots of extra space in each Area – whereas an Overlay Code only gives an extra 100% - the London experience will have taught that. More than 50% of all customers are now on Wide Area codes, so it would seem sensible to continue that approach. It is surely misleading to suggest that going down the Wide Area route means massive renumbering – this could lead to allegations of scaremongering. Only the few areas needing more capacity need to be changed, not the whole country (and again we can call on experience gained in Wales). Wide Area codes do not discriminate against new entrants, whereas Overlay Codes do.

The 1000 block routing was part of a number conservation plan, designed to delay the introduction of Wide Area code changes, not replace them. The idea was that to focus publicity, changes would be grouped as in 1995 and 2000 –a repeat of the Reading fiasco was to be avoided at all costs. 1000 block routing in the present PSTN could be extended but it reduces the public’s familiarisation with the geographic meaning of numbers, which despite VOIP, is likely to be with us for a long time.

**Overall, CMA is very strongly opposed to any use of overlay codes.**

#### The 06 Range (Q3, Q15)

The rapid growth of IP-based communication brings with it a rapid expansion of unified communications. Avaya, for example, has a concept of “one number” that sweeps up the TDM-based “follow-me” and personal number propositions. An Avaya business

customer would have a choice of taking a number in the new 06 range, or staying with an existing number in the range currently in use within his enterprise. CMA therefore has reservations about the size of the market for personal numbering in the timescale being pursued for the implementation of NGNs. It would be a pity to undergo an administrative upheaval (moving from 07 to 06) if the personal numbering market as we know it is about to shrink rapidly.

#### The Impact of the NGN on Numbering

On the other hand, a major change to numbering strategy should not be contemplated without a detailed understanding of how the NGN treats IP and E164 numbers. CMA makes no pretence to have such understanding, but we suspect that the following “facts” (gleaned from a variety of external sources) would repay further investigation and validation, possibly via the NICC:

- NGNs only route on IP numbers within the telco’s own network, using a private IP number range proofed against hackers;
- Ordinary E164 numbers are used for interconnection;
- As with IP routers which were unable to analyse the entire world’s IP numbers, it would be dangerous to assume that the NGN’s analytical capability will be good enough to identify the minutiae of all other telcos’ numbering plans;
- Therefore, we should try to maintain analysis at the 10k level;
- ENUM is sufficiently ill-defined as to be discounted at this stage as the answer to anything.

#### The use of a PIN in the 09 Range (Q11, Q12)

Ofcom’s proposal to grade the allocation of code pairs from the 09 range according to content will only be useful to enterprises if the ability to bar the higher ranges is supported by suppliers. CMA would like to see the imposition of barring made easier by the introduction of PINs. From the citizen-consumer viewpoint, the need to use a PIN for the higher ranges would allow personalisation of the user and reduce claims for fraudulent use. Should the default position be “opted out” from higher charge (all?) PRS services?

#### The Need to be able to dial Freefone 080 Numbers from outside the UK (Q10)

We do not understand why non-geographic numbers are still not fully accessible throughout the Union as the Directives require. If the problem is that international traffic is still being exchanged via ITU settlement rates, coupled with the difficulty of ensuring that every country’s tariff structure is replicated in every other country, then it is time that Ofcom made a formal submission via the ERG to the Commission. We note that it is possible to call Freefone numbers in the USA from outside that country, paying only for the international leg of the call. UK businesses are therefore disadvantaged and CMA would like Ofcom to investigate the possibility not only of calling 03 numbers from abroad, but also extending the facility to Freefone numbers used by UK businesses. We would further comment that legacy 6 digit 0800 and 0500 numbers are not all with BT and C&W – Number Portability has diluted ownership.

#### Citizen-Consumer Over-reaction (Q2)

CMA members were heavily involved in the arrangements for the National Code Change. At that time there was considerable disquiet over the risk of a major reaction from consumers and enterprises. In the event, apart from some alarmist reports and dire warnings in some sections of the media, the reaction was muted and short-lived and

the new system settled down remarkably quickly – possibly because Oftel and the industry acted jointly to advertise the changes. Indeed, Oftel's 1995 research showed how, 6 months afterwards, everyone had taken the changes in their stride and thought little of it.

The results of Ofcom's survey (showing a large majority against change) are not surprising – most consumers don't distinguish between Code and Number. Ofcom's current proposals are relatively straightforward and involve minimal disruption and CMA urges Ofcom not to place too much emphasis on the risk of a negative reaction. However.....

#### Raising Consumer Awareness (Q2, Q20)

.....raising consumer awareness is an issue that must be addressed. There is no point in producing a rationalised, tariff-transparent structure if the citizen-consumer doesn't understand what is being done and why. This will require a significant budget – much greater than if the existing NNP is persevered with.

#### Number Formats (Q2, Q20)

Part of any advertising campaign should be advice on how to lay out numbers on TV, business documents, bill-boards and letter heads. The use of number formats designed to deceive (such as 08703 xxx yyy) should be deterred and the use of local dialling should be clarified. The industry, working with business organisations such as CMA and the CBI should be invited to produce a Code of Practice.

#### Some Observations on Specific Paragraphs

Para 5.90 (price meaning for non-dominant telcos) - Isn't one of the standard consumer benefits of a policy based on competition the establishment of differing prices – this proposal has the appearance of not having been thought through.

Para 5.93 - surely adding more ranges makes the scheme more complicated – not simpler.

Para 5.99 (“command and control”) - A command and control approach is probably inevitable if high utilisation is seen as a good thing. However, a Wide Area approach would lead to a more relaxed management style – something that Ofcom, we assume, would wish to embrace.

Consultation on numbering for sexual entertainment services -

[http://www.ofcom.org.uk/consult/condocs/supply\\_numbers/](http://www.ofcom.org.uk/consult/condocs/supply_numbers/) - it seems reasonable to advocate that any decision on the latter should be made in the light of the strategy established by this consultation. This is Option 3 in the referenced condoc.

#### **Footnote - CMA's Internal Consultation Process on Regulatory Issues**

Any consultation document (condoc) received by or notified to CMA is analysed initially by the appropriate Forum Leader for its relevance to business users based in the UK. (The majority of CMA's members are based in this country, with a third of them having responsibility for their employers' international networks and systems).

If the document is considered relevant to CMA, it is passed, with initial comments, to members of both the appropriate Forum and the 20 or so members of CMA's

“Regulatory College” – ie: those members who have experience in regulatory issues, either with their current employer, or previously with a supplier. The CMA Chairman and CEO are also members of the College. The detailed comments from the College are collated by the Forum Leader in the form of a draft response to the condoc. Note: if the condoc has significant international import, the views of the international user community could be sought. This is done through the International Telecoms User Group (INTUG).

The draft response is sent to all 1500+ user members of the Association, with a request for comment. Comments received are used to modify the initial draft. The final version is cleared with members of the appropriate Forum and Regulatory College (and, if the subject of the consultation is sufficiently weighty, with the CMA Board).

The cleared response is sent by the CMA Secretariat to the originating authority. It might be signed off by the Leader of CMA’s Regulatory Forum, and/or by the CMA Chief Executive and Chairman.

# Consultation questions

## Questions from Sections 1-5

*Question 1 What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions?*

*Question 2 What do you think are consumers' key current views on numbering, how do you think those views will change, and how should Ofcom's current decisions take those changes into account?*

*Question 3 What do you think are the main ways in which technological developments will change the focus of numbering policy decisions, and how should Ofcom's current decisions take these developments into account?*

*Question 4 Do you have any comments on Ofcom's assessment of the current challenges to the Numbering Plan, in terms of a) number availability, b) transparency, or c) consumer abuses?*

*Question 5 Do you agree that the extension of conservation measures is the best approach to take before the impact of NGNs eases the pressure on geographic number demand?*

*Question 6 Do you agree that the use of overlay codes is the best backstop approach in the event that extended conservation measures are not sufficient to meet demand for geographic numbers?*

*Question 7 Do you agree that Ofcom should continue to respect the geographic identity of numbers until consumer understanding of the impact of technology change evolves further, and what do you consider is the best way to develop that consumer understanding?*

*Question 8 Do you agree with Ofcom's proposal to open a new '03' number range for non-geographic, non-revenue sharing services?*

*Question 9 How should the '03' range be structured, in terms of tariffs and services?*

*Question 10 How should the '08' range be structured, in terms of tariffs and services?*

*Question 11 Which broad approach should Ofcom take to structuring the '09' range, and if a re-structured '09' range is preferred how would you arrange the different types of '09' services (e.g., according to price per minute, price per call, inclusion of adult content)?*

*Question 12 Should any specific PRS service categories be identified or segregated in order that parents can block access by their children (e.g., sexually explicit content, gambling)? Is there merit in having a general 'adults only'?*

*classification, including a range of services to which access might be restricted on the grounds of content, or might consumers wish to apply different rules for different types of content?*

*Question 13 Are there any practical means by which the Numbering Plan could provide improved mobile tariff transparency?*

*Question 14 Do you agree that personal numbers should have a tariff ceiling (or recorded message) to restore trust in those numbers? If so, what level, and should that ceiling include the cost of recorded messages?*

*Question 15 Do you agree with Ofcom's proposals to move personal numbers (with the same consumer protection provisions) to the '06' range and to pursue the direct allocation of numbers to end users as proposed at some point in the future?*

*Question 16 Do you have any comments on the use of the 05 number range?*

*Question 17 Do you agree that Ofcom's overall proposals for a future Numbering Plan are coherent and comprehensive, and do you have any comments on the timescales in which the changes should be implemented?*

*Question 18 Do you agree with the principle of using consumer protection tests in numbering in order to limit consumer abuses, as long as the relevant legal tests are met? Do you have any suggestions for what tests would be appropriate or any conditions that should be met to pass such tests?*

*Question 19 Do you support the proposal to extend the tariffing provisions of the Numbering Plan so that they apply to customers of all providers on all types of network?*

*Question 20 How do you think the new Numbering Plan could be effectively communicated to consumers?*

*Question 21 What are your views on Ofcom's analysis and the different options for number charging?*

*Question 22 Which, if any, numbers might appropriately be allocated using a value-based charge?*

*Question 23 Do you have any other comments on Ofcom's proposals for numbering as discussed in Section 5, or any other suggestions for how Ofcom might revise the current Numbering Plan or its administration?*

## **Detailed questions from Annexes 1-5**

*Question 24 What do you think of Ofcom's proposed general approach to managing geographic numbers?*

*Question 25 Do you have detailed evidence or suggestions on the variables likely to influence demand for geographic numbers, how those variables will change over time, and how Ofcom should develop a demand model?*

*Question 26 Do you agree with the specific proposal for how to extend conservation measures, including the extension to areas with a number shortage predicted in the next five (rather than two) years?*

*Question 27 Do you consider there to be any upper limit, in terms of technical feasibility, on the number of areas in which conservation measures could be used?*

*Question 28 Do you agree with Ofcom's assessment of the impact of conservation measures on stakeholders?*

*Question 29 Do you agree that Ofcom should pursue these additional ways to improve number utilisation and, if we do, how would stakeholders be impacted and what practical issues are involved?*

*Question 30 What are your views on overlay codes, and Ofcom's assessment of them, as a fallback option to increase number supply? What should be the maximum number of areas where overlay codes are introduced?*

*Question 31 What are your views on closing the scheme, and Ofcom's assessment of it, as a fallback option to increase number supply?*

*Question 32 What are your views on wide area codes, and Ofcom's assessment of them, as a fallback option to increase number supply?*

*Question 33 Might wide area codes be appropriate in regions with a strong identity and, if so, which specific regions are suitable for wide area codes?*

*Question 34 Do you agree with Ofcom's assessment of the problems with current 08 and 09 in terms of information clarity and consumer perceptions?*

*Question 35 Which of these options for current 08 services do you think is best in terms of a) increasing consumer transparency and b) minimising the costs of re-structuring the 08 range?*

*Question 36 How might early migration to the '03' range be encouraged?*

*Question 37 Is it more important to indicate price per minute or price per call, and does this vary for different types of PRS service? What granularity of PRS tariff information should be given to consumers by the Numbering Plan?*

*Question 38 Should there be any PRS number ranges with no tariff ceiling?*

*Question 39 What is the typical turnover of 09 numbers, and what does this mean for migration timescales to a new 09 Plan? How could Ofcom structure the 09 range or take other steps to promote voluntary migration of 09 services?*

*Question 40 Do you agree that that part of the 07 range which is currently unused (071-075) should be reserved for mobile services, with the aim of establishing 07 as a mobile 'brand'?*

*Question 41 Should Ofcom reserve specific sub-ranges within the 071-075 range for new mobile multimedia services, in the interests of promoting consumer awareness and tariff transparency, and if so how?*

*Question 42 Do you support the use of 100,000-number blocks in allocating mobile numbers to new mobile voice providers?*

*Question 43 Based on the above analysis, if Ofcom were to introduce a charge ceiling on calls to 070 numbers, which of the following levels should be adopted; i) 10 ppm ii) 15 ppm iii) 20 ppm iv) something else ?*

*Question 44 Would a requirement to make tariff information clearly available to purchasers of personal numbering services at the point of sale, either in addition to, or instead of a call ceiling, be an effective means of providing tariff transparency on personal numbers?*

*Question 45 If a new sub-range is made available for personal numbering services, how long should the current '070' sub-range remain available for existing providers, in order to minimise migration costs?*

*Question 46 What issues do you think would need to be resolved before Ofcom makes individual numbers available for direct allocation to end users?*

*Question 47 What do you consider to be the main strengths and weaknesses of the current rules-based system of UK number allocation?*

*Question 48 Do you agree with these principles for number charging?*

*Question 49 What are your views on Ofcom's assessment of the issues to be considered in setting and reviewing number charges? For example, should other issues be considered in developing charging proposals?*

*Question 50 Do you agree that charging for numbers could disincentivise economically inefficient behaviour, and incentivise economically efficient utilisation?*

*Question 51 What internal changes would communications providers have to make, and at what cost, to support charging for numbers? Would these changes be preferable to earlier and more widespread use of conservation measures and (limited) changes to increase geographic number supply?*

*Question 52 How might existing number allocation rules be reduced if charging for numbers was introduced?*

*Question 53 What are your views on this illustrative charging mechanism, and would you suggest any changes or alternatives to it?*

*Question 54 How would charging for number blocks affect consumers?*

*Question 55 What impact do you think charging for numbers would have on sub-allocation? Should Ofcom encourage or facilitate sub-allocation and, if charging were introduced, would changes be needed to the process of sub-allocation to facilitate trading?*

*Question 56 Which types of consumer abuse do you think Ofcom should particularly attempt to address through its numbering policy decisions?*

*Question 57 Which number ranges and types of originating communications provider do you think should be covered by an extension of the Numbering Plan's tariffing provisions? What practical issues are involved, and how would this vary according to the number ranges and service providers involved?*

*Question 58 What do you think of the potential conditions proposed by Ofcom for inclusion in a consumer protection test for number allocation, including the proposals that numbers should not be provided to anyone with a particular track record of persistent and/or serious consumer abuse?*

*Question 59 Are there any other circumstances in which it may be appropriate for Ofcom to refuse number allocations?*

*Question 60 Would you support the use of a consumer protection test as a basis for withdrawing number allocations? What kind of considerations should Ofcom apply in any such test, and what would be the practical issues involved in applying such a test?*

*Question 61 What consumer abuses do you think might occur in the future, and what steps might Ofcom take now in its numbering policy in order to reduce the potential for such abuses?*