

Response to *Geographic telephone numbers: safeguarding the future of geographic numbers* consultation published 20 March 2012

Submitted by: 'Name Withheld 1'

Additional comments:

Is the inclusion of Scottish and Welsh area codes in future plans entirely appropriate, without more broad-ranging consultation on the future of those countries' numbering? Either nation might legitimately wish to look at their numbering more strategically (or even consider a country-wide scheme like Northern Ireland), before having anomalous areas of closed local-dialling imposed.

Question 1i: Do you have any comments on i) our proposal to close local dialling in the Bournemouth 01202 area code on 1 November 2012:

Clearly a short-term quick-fix that will lead to more hassle and confusion for us in Bournemouth longer-term. It seems unfair that while cities such as London get proper long-lasting fixes, we're lumbered with a bodge that will release only a very small amount of extra capacity and get increasingly confusing when overlays are inevitably introduced.

Question 1ii: our view as to how the proposed modification to the Numbering Plan in relation to closing local dialling in the 01202 area code on 1 November 2012 meets the relevant legal tests in section 60(2) of the Act or:

Question 1iii: the proposed modification to the Numbering Plan in relation to closing local dialling in the 01202 area code (set out in Annex 7)?:

Surely there's a way to refer to areas with closed local dialling collectively, rather than adding a specific extra clause for each affected code?

Question 3i: Do you have any comments on i) our proposals to make 100 blocks of 100-numbers available for allocation in the 11 five-digit area codes:

You have not resolved the issue of Brampton effectively having both 01697 and 016977 area codes in simultaneous use. Incumbent operators in Brampton use 016977 (5+4 or 5+5 numbering) but any newer entrants are 01697 (4+6). Giving newer operators a different code - and numbers that are difficult to dial locally - is seriously anti-competitive.

Perhaps merging 016973, 016974, 016977 and 01697 would resolve this issue - given that any argument about losing local number significance is rendered void when you consider that the current numbering arrangements clearly aren't being deployed consistently or meaningfully on the ground.

Question 2, 3ii, 3iii, 4 and 5: no comment