

Response to *Geographic telephone numbers: safeguarding the future of geographic numbers*

Submitted by: Pitts, Mr J

Additional comments:

If the underlying problem is that of available number allocations being under-utilised then surely to goodness, dealing with under-utilisation is the first thing. You admit that the UK is alone within Europe, in not charging for blocks of numbers - with the resulting numerous small operators having to grab 1000 numbers at a time, when they may only have need for 1 or 2.

So charging for numbers is surely the first step - even with local dialling stopping, you say this will only delay another "full up" scenario.

I see nothing wrong with opening up multiple area codes for the same area, but again - if you are only then going to get numerous small operators wasting capacity by "sitting on" thousands of numbers that are being wasted - well lets deal with that issue before just putting a sticking plaster on.

Opening up the 0s & 1s seems entirely sensible, but it would be logical to do things in certain orders. Charge for numbers and force the entire industry to be efficient. Once done, parallel area codes. Once done, close local dialling. Perhaps the last 2 at the same time.

I fail to see the point freeing up new blocks through closing local dialling and opening new area codes, if the numerous small operators are only going to then grab a block of a thousand and waste a high percentage of the new allocation

Question 2 & 3: Yes

Question 5: No. For as long as "every operator and his dog" can grab a block of a thousand numbers at no charge and waste them - opening up new allocations is only going to add to the waste.

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Question 10: Stop using sticky plasters and deal with the underlying issue.

Question 13: Yes

Question 14: An operators need for numbers - likelihood of using them, number of customers, market penetration, amount of their existing allocation that they are using (therefore the need for new ones)

Question 15: No

Question 19: Yes

Question 24: It seems entirely reasonable. If a number is being used, even if only for occasional calls, then 10p per annum is easily recouped.