

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

Consultation title: Telephone Numbering (Safeguarding the future of numbers)

To (Ofcom contact): Andy Montaser

Name of respondent: Thomas William Hall

Representing (self or organisation/s): Self

Address (if not received by email):

### CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing  n Name/contact details/job title

Whole response  n Organisation

Part of the response  n If there is no separate annex, which parts?

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)? y

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Name

Signed (if hard copy)

## Annex 10

# 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?*

The principle of differential charging has gone too far.

*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?*

As a consumer I believe the concept is far too complicated. The whole idea of a hierarchical system of premium telephone numbers is based on the premise that different kinds of communication should be charged at differential rates. If this were restricted to a difference between landline rates and mobile telephone rates it would be acceptable. However it is not acceptable to have such a plethora of premium rate numbers that consumers are forced to use to contact companies and essential services. Many companies now use 0870 numbers instead of geographic numbers. These numbers, as well as other premium numbers, have a range of costs, which results in the consumer never knowing exactly how much they are being charged. So as more consumers become aware of the increasing cost of telephone calls, I believe they will find alternative ways of communicating that will be less expensive

*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?*

Technological developments will inevitably tempt Ofcom to create an even more complicated structure to the one currently envisaged. Currently the decision should be taken to start simplifying it.

*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?*

The numbering plan should revert to geographical numbering with as few exceptions (e.g. mobile numbers) as possible.

*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?*

*No. Geographic numbers need not be under pressure if many of the current non-geographic numbers were to be allocated as geographic numbers.*

**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?*

I do not understand what overlay codes are.

**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?*

Yes I do. The best way to develop consumer understanding is to keep the system as simple and straightforward as possible. This need not involve rocket science

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

*No. Use all available numbers to extend geographic numbers, See my answer to question 7.*

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

See above

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

See above.

**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)?*

*All too complicated for your average consumer.*

**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?*

*Again far too complicated. Parents can put a "lock" on the telephone now if they do not wish children to use it. If all these so-called services had to use geographic numbers, the only consumers who would know the numbers would be the regular punters; certainly not children.*

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

The price per minute, depending on the code, could come up after the number has been entered.

*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?*

No comment.

*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?*

No comment

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

No comment

*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?*

The proposals may be coherent but they will be largely incomprehensible to the majority of consumers no-matter how long or short a time it takes to implement them.

*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?*

No comment.

*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?*

No

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

To effectively communicate such a complicated system to all consumers would be impossible. This is a major objection to Ofcom's proposals, as well as the very high tariffs for numbers that consumers have no other choice but to use.

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

*There are too many options and too many different tariffs and many of the tariffs are far too high.*

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

*No comment.*

**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?*

*Simplify the current numbering plan.*

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

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

*The approach is too restrictive. The use of geographic numbers could and should be far more widespread.*

**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?*

*No comment.*

**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?*

*No.*

**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?*

*No comment.*

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

*No comment.*

**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?*

*Definitely not.*

**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?*

*See previous comment re overlay codes.*

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

*No comment.*

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

*This is a reasonable option.*

**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?*

*Yes. Pricipally conurbations.*

**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?*

*Absolutely; which is why they should be abandoned.*

**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?*

*See above.*

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

*03 numbers should be part of the geographic numbering system.*

**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?*

*It is more important to simplify the whole system in order to introduce much more transparency to the consumer.*

*What on earth does "granularity of PRS tariff information" mean? If this is the quality of Ofcom's English there is no hope for the rest of us understanding anything Ofcom proposes.*

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

*No.*

**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?*

No comment

**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'?

Yes.

**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?

Yes.

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

Yes.

**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 ?

The question does not make sense as no levels are given.

**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?

I suppose so, although I am not in favour of retaining 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?

No comment.

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

If there is a perceived shortage of geographic numbers, personal numbers should be phased out and allocated to geographic numbers.

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

*Far too complicated.*

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

*No.*

**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?*

*No comment.*

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

*Excessive charging for certain ranges of numbers will reduce the willingness (disincentivise? whoever dreamt up such a horrible verb?) of an increasing number of consumers to use those numbers whether their behaviour is inefficient or not.*

**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?*

*I do not know what internal changes would have to be made, nor what it would cost, but they would certainly not be preferable to any changes intended to increase geographic number supply.*

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

*Charging for numbers is unacceptable.*

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

*There is no illustrative charging mechanism shown.*

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

*It would cause resentment.*

**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?*

*No comment.*

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

*No comment.*

*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?*

*No comment.*

*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?*

*No comment.*

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

*No comment.*

*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?*

*No comment.*

*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?*

*No comment.*