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18<sup>th</sup> May 2006

Dear Mr Montaser,

TELEPHONE NUMBERING – Safeguarding the future of numbers.

I apologise for not meeting your submission date, the delay caused mainly by strategic moves made by many of our suppliers to position themselves to take account for the 0870 rebate changes which you are proposing, which in turn affect us and our customers.

We have been resellers of Non Geographic Numbers since 1995 when the 07000 range was introduced and have built up relationships with most major carriers ( suppliers ) over the years. In the past three weeks one of those has chosen to go into receivership, which may or may not be a result of your future proposed changes ( but I suspect that the loss of their significant 0870 rebate income stream was put into the equation ), and four others have introduced monthly rental charges on ALL 08 ranges where none existed before.

All these charges will be in effect by June and we have to pass them on to our customers who will themselves pass them on in some form or another and so the person who ends up paying for the changes you are very proposing are the very people you are trying to protect.

We also supply 0870 numbering to the shopping channels and nearly all of those clients are now moving on to the 0871 number range which once again means that the caller will pay more for the call than before and our client receives a bigger rebate than before. I agree with a comment made by NTL that “ current problems could simply move from one number range to another.”



Surely the way forward is to leave the present set up exactly as it is at the moment and take stronger action that you seem to against those few who abuse the present system.

As your researches have shown, consumers are more concerned with the lack of pricing clarity that with the fact that rebate payments are being made. Surely some small public information campaign would cure that.

When I read first of your 03 proposal I felt it to be an elegant solution to it all but it only makes sense if the present pricing structure is maintained. There would seem to be no point in introducing the 03 NGN range as well as reducing the 0870 call rate.

I am more concerned however about your proposed changes to Personal Numbering. We derive significant income from the 07000 and 07002 ranges and the Revenue & VAT similarly benefit.

I do not see why you want to change the 07 prefix. For the most part calls to 07000 numbers cost less than mobile calls and it seems that you may want to reduce them from their present 14.22p. Similarly 07002 calls are National Rate.

Of even more concern however is that if you do change you must change to 06000 and not 06XXX. If you change to anything else I foresee that most all of our present customers will simply give up their numbers which we, and many other companies, have spent hundreds of thousands of £'s in promoting over the years. Not to mention the cost to existing users to make changes.

Any other change would put the future of this Company in doubt.

Also if you change the 07002 prefix it must be to 06002 otherwise we will lose all our customers as the 2 in the prefix is always incorporated into the number, as in 0700 24 24 365.



Finally, if I read your proposals correctly, your intention is to retain the 06000 prefix for your own possible use in the future.

I find this suggestion quite alarming ! Can we expect more Government Departments to go into competition with the industry they are set up to regulate.

In conclusion, and in short, I suggest you leave the present structure well alone, prefacing 0870 calls, as you seem to suggest, with an announcement as to the cost of the call. and make no 070 changes, except to maybe cap the Personal Number rate below its present 14.22p per minute.

Yours sincerely  
GLOBAL TELECOMMUNICATIONS LTD

A handwritten signature in black ink, appearing to read 'D.C. Bayliss', with a long horizontal flourish extending to the right.

D.C. Bayliss  
Chairman