

**Title:**

Mr

**Forename:**

**Surname:**

Scott

**Representing:**

Organisation

**Organisation (if applicable):**

The Fernwood Trust

**Email:**

mail@fernwoodtrust.org.uk

**What do you want Ofcom to keep confidential?:**

Keep nothing confidential

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

You may publish my response on receipt

**Question 1: Do you agree with our analysis of consumer detriment on the 070 number range?:**

Yes

**Question 2: Do you agree that the costs outweigh the benefits in relation to closing the 070 number range and migrating users to an alternative range?:**

Yes

**Question 3: Do you agree that Ofcom should keep the 070 range open and monitor the market in light of enforcement action by PhonepayPlus?:**

Yes

**Question 4: Do you agree that Ofcom should require OCPs to give greater prominence to the cost of calling 070 numbers in published price lists and promotional material?:**

Yes

**Question 5: Do you agree that Ofcom should amend its guidance to ensure that PNS providers carry out appropriate due diligence of sub-allocates of personal numbers?:**

Perhaps, but only where necessary, objectively justifiable and consistent with the need to avoid artificial barriers to EU and international trade.

**Question 6: Do you agree that Ofcom should not bar the presentation of 070 CLI? Please provide evidence to support your response:**

Yes. CLI is an important facility in normal use. If it is barred on 070 then it follows that it also should be barred from many other services. There are better, more generic, ways to deal with such scams e.g. the introduction of Call Price Labelling, so that callers can immediately check the call price and decide whether to pay for a return call.

**Question 7: Should services provided by, for example, Hospedia, Premier Telesolutions and Trader Media be provided on an alternative number range to 070? Please provide any evidence to support your views.:**

Yes. Patientline and similar services are clearly premium rate use, i.e. where the revenue is used to pay for equipment provision, not call forwarding. They should use 09x numbers.

**Question 8: Do you agree that Ofcom should withdraw formally the requirement for pre-call announcements on 070 Personal Numbers?:**

Yes. This concept was always fatally flawed, dangerous and not in line with EU and ITU regulations and recommendations. Ofcom had been warned about this several times, by industry experts, since 2004, but carried on regardless, in what appeared to be a reckless manner.

**Additional comments:**