

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

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Additional comments:

I have let myself down in this response and tainted it with cynical irony. Please do not ignore my fundamental point: The UK does not need 610 geographic regions. I challenge Ofcom to justify this number. The role of geographic codes is not to help define the socio-economic status of a company or an individual. Geographic codes exist only to define the difference between local and national calls. Break out of the box, think radically, examine other, national solutions and redesign the UK telephone numbering system to try to make it future-proof and functional. Tinkering with a flawed system is, literally, a waste of time and effort. Worse, it is producing an ever more complicated system that keeps hitting mathematical limits.

Question 1: Do you have any comments on the objectives and approach to this review of geographic number management? Do you agree with the policy principles that we consider should inform the review?:

Because of the difficulties / impossibility of dialing any UK number starting with 08 from outside the UK, Ofcom should insist that all companies that provide a 0845 or 0870 (local rate) number should also provide geographic code alternative numbers.

Question 2: Do you agree that we should not consider further at this stage options that would change existing numbers?:

YES

Question 3: Do you agree that local solutions are appropriate based on our current forecasts of anticipated requirement of more numbers?:

NO

Question 4: Do you agree with our assessment of the options for providing new supplies of numbers in four-digit code areas, as presented in Section 4 and in Annex 3:

Only if all revenue sharing numbers are abolished. The fact that some Government departments providing essential services to impoverished benefit recipients are now using revenue sharing numbers shows that this aspect of telephony is out of control and is harming consumers. If Ofcom cannot take appropriate decisions, essential to protect consumers from outrageous exploitation, maybe Ofcom is failing in its duty.

Question 5: Do you agree that closing local dialling followed, if necessary, by the introduction of an overlay code should be the preferred option for

**providing new supplies of numbers in four-digit areas that may need them?
Please give reasons for your answers, and provide evidence where possible.:**

Only if the overlay code is only one digit long. Keep things simple. Think of the elderly. Check the research on humans' ability to remember a sequence of numbers. If the French telecom industry can provide 10 digit numbers that include a regional code why does Ofcom believe the UK needs many more digits.

Question 6: Are there any other number supply measures that we should consider for four-digit areas?:

See my answer to Q5.

Question 7: Do you agree that we should merge five-digit codes with four-digit codes to create new supplies in five-digit code areas that need them? Do you have any comment on our assessment of the impacts of the options we have considered? If so, please provide relevant evidence where possible.:

NO. Please look carefully at the French dialing code system. If geographic areas were enlarged so that the same code applied to a region (County?) the need for codes would reduce enormously and the areas counted as a local call would be much larger.

Question 8: Are there any other numbers supply measures that we should consider for five-digit areas?:

See my previous answers. The problem is the ridiculously small area covered by each geographic code.

I quote from your consultation document: "Competition has driven many of the benefits that users of telecommunication services currently enjoy."

In what way has the universal flight to 08 numbers improved competition? Answer -in no way. 08 numbers have been adopted to rip-off consumers and almost every company in the UK has jumped on the gravy train.

Question 9: Do you agree with our considerations and preliminary conclusions on how new supplies of numbers should be provided where they are required?:

NO - because you have not addressed the fundamental flaw in geographic codes. See previous answers.

Question 10: Do you have any comments on how the implementation of number supply measures should be planned?:

Start again with a clean slate and copy the French system.

Question 11: How long do you consider that CPs would need to plan the implementation of the preferred options for four- and five-digit areas?:

No time at all because the preferred options are an attempt to overcome a flawed system. They should therefore not be implemented. I can only repeat my advice to copy the French system and enlarge geographic boundaries covered by 'local codes'. It might be necessary to add one digit to the French system to create 11-digit numbers.

Question 12: If you are a CP, what costs do you consider that your company would incur if the preferred options for four- and five-digit areas were implemented?:

I am not a CP.

Question 13: Do you think that we should reserve a limited amount of numbers for allocation in blocks of 100 numbers in area codes where it is feasible to do so?:

Please note you cannot have an amount of numbers. The word amount refers to volumes of substances such as sand, water, air. I think you meant to say: "A limited range of numbers." I am surprised to discover that Ofcom does not pay its staff enough money to recruit people with a good grasp of grammar.

Regarding the badly worded question, see my earlier answers. The problem with area codes is simple. There are far too many areas. If you reduce the 610 areas to around 100 areas - problem solved.

Question 14: What criteria, if any, in addition to a first-come first-served basis should be used for allocating such blocks of 100 numbers to providers?:

Priority should go to CPs who offer the lowest rates guaranteed for the longest time.

Question 15: Should the geographic extent of such allocations be limited to the seven areas likely to run out of numbers for allocation before 2015? (i.e. Blackpool (01253), Bournemouth (01202), Bradford (01274), Brighton (01273), Derby (01332), Langholm (013873) and Middlesbrough (01642)):

Combine these areas into a new set of around 100 areas and the problem disappears.

Question 16: Do you consider that there are any technical obstacles currently to the effective sharing of number blocks by CPs and to sub-allocation? How could we usefully address those obstacles?:

Technical obstacle: Small cerebral cortex syndrome associated with paucity of neurons and neuron connections. Solution: recruit staff with high creativity and radically redesign system.

Question 17: What are your views on the concept, practicalities and implications of introducing a reservation system for geographic numbers?:

Will only work if you reduce the total number of geographic areas to 99.

Question 18: Do you have any comments on our proposed scope of additional audits?:

No.

Question 19: Do you agree with the high level objectives proposed for the charging regime?:

No. As in the USA, local calls (to enlarged geographic regions) should be free. If this is affordable in the USA why not in the UK?

Question 20: Do you envisage that sub-allocation would increase if number charging is introduced? Do you have any comments on our analysis of barriers to successful use of sub-allocation?:

Unhelpful question because it reflects the lack of imagination in the whole package of proposed solutions. Instead of trying to solve the problems created by a silly system, change the system.

Question 21: Do you agree with our view on how charges could be set? If not, please propose an alternative approach with supporting evidence.:

Charging CP's for geographic numbers that produce no income is crazy. This suggestion shows just how little importance Ofcom places on consumers' interests. If you (Ofcom) actually implement these proposals, you will make it virtually impossible to call a UK company from outside the UK.

Question 22: Do you agree with our preferred option for charging for geographic numbers? (i.e. Option 2 Pilot scheme: Charge a flat rate of 10p per number per annum in area codes with 100 or fewer blocks of 1,000 numbers (no charge for other areas). If not, please state your reasoned preference.:

There should be no charge for geographic code numbers because they are already an endangered species. Many, many companies have switched to 0845 numbers and stopped using geographic code number. As a result, they cannot be called from France and many other countries.

Question 23: Do you agree that the threshold for including an area code within the pilot scheme should be 100 or fewer 1,000-number blocks remaining to allocate? If not, please state your preferred threshold and reasons.:

I repeat; reduce the total number of geographic areas to 99 or less = problem solved.

Question 24: Do you agree with the proposed level of the charge (i.e. 10p per number per annum)?:

No.

Question 25: Are there any other incremental administrative costs likely to be incurred by CPs in relation to number charging? Can you estimate the magnitude of any such costs? :

I am not a CP.

Question 26: Do you agree that we should not pursue a policy of charging for golden geographic numbers? If you do not agree, please provide your reasoning.:

If you reduce the total number of regions to less than 100, the golden numbers will disappear.
Bavo!

Question 27: Do you have any views on the principles for cost recovery? Do you have any views on the cost recovery mechanism? Do you agree with the preferred approach?:

I am not a CP and cannot comment on this question.