

INTRODUCTION

Cable&Wireless is one of the world's leading international communications companies. It operates through two standalone business units – Worldwide and CWI. The Worldwide business unit provides enterprise and carrier solutions to the largest users of telecom services across the UK and the globe. In October 2008 Cable&Wireless strengthened its position when it acquired UK business communication provider THUS. With experience of delivering connectivity to 153 countries – and an intention to be the first customer-defined communications service business – the focus is on delivering customers a service experience that is second to none.

More information on Cable&Wireless can be found at: <http://www.cw.com/>

Today Cable&Wireless has the necessary scale to meet the needs of UK enterprise customers and we are a strategic provider of voice services to both the UK public and private sectors, offering a range of innovative and market leading voice products. Our customers include most of the UK's top companies and public sector organisations, each of whom has placed its trust in Cable&Wireless to deliver an array of business critical services. As a consequence we are a large user of the geographic numbers that support the many businesses and organisations that rely on these numbers to communicate with their customers.

Cable&Wireless welcomes this opportunity to respond to Ofcom's consultation *Conserving Geographic Numbers*. We are concerned however not so much by the contents of the consultation, but rather what is absent from the document. When Ofcom published *Telephone Numbering: Safeguarding the Future of Numbers* in 2006 it was the culmination

of a work stream that set out “Ofcom’s strategic decisions about how telephone numbers will be managed over the next five to ten years”¹.

When the strategic policy was devised it was expected that there would be a wholesale shift from traditional TDM networks and their reliance on the geographic significance of numbers to an NGN and VOIP world where the significance of CLI in terms of location would no longer be as relevant. This shift is still to occur and its future timescale seems sufficiently far away for it to be a significant risk to continue with the 2006 policy without revisiting its assumptions. Indeed the underlying assumption that there would be a relaxation in the demand for geographically significant CLIs by 2011 appears to be totally undermined by these latest conservation measures. We are only three and a half years into that period and have already seen conservation measures in:

27 additional areas in 2006;
91 additional areas in 2007; and
96 additional areas in 2008²

The need to apply conservation measures to ostensibly all of the remaining geographic number blocks is clear evidence that not only is Ofcom’s five year forecasting of areas requiring conservation fundamentally flawed but that its strategic plan is failing. There is no acknowledgement or consideration of this in the latest consultation which we find to be highly disappointing. It seems that Ofcom are continually taking tactical measures such as usage of conservation areas, while not addressing the wider strategic issue of fulfilling demand for numbers in the longer term. It is particularly disappointing that Ofcom’s examination of call routing³ failed to address this issue, focussing narrowly on portability issues.

¹ *Telephone Numbering: Safeguarding the Future of Numbers para 1.1*

² *Conserving Geographic Numbers Para 3.8*

³ *Routing calls to ported telephone numbers, August 2009*

Cable&Wireless has clearly voiced its opposition to the use of overlay codes in previous consultation responses and we are deeply concerned that Ofcom appears to be moving inexorably towards a situation where there is no other choice than to introduce them.

Unfortunately we have no data to be able to judge whether the conservation measures are proving effective in those areas where they have already been enforced. We call on Ofcom to make data available on the success or otherwise of its conservation measures across all geographic regions and whether this is indeed resulting in the improved levels of utilisation which were forecast in 2006⁴. The *Safeguarding the Future of Numbers Statement* anticipated that there would as a worse case be a requirement for twelve areas to have overlay codes by the end of 2012.⁵ We ask Ofcom to confirm whether its projections show this to still be the case and what steps it is taking in terms of reclaiming unused blocks in those areas under threat of overlay codes.

QUESTIONS

Question 1: Do you agree with Ofcom's proposal for the 336 geographic area codes listed in the schedule to the notification in Annex 7 to be determined as

Conservation Areas? Are there any codes which you think:

- a) should not have been included in the proposal; and/or
- b) should have been omitted?

If so, please state which codes and for what reasons.

Cable&Wireless agrees that the evidence Ofcom has provided in relation to geographic number demand does warrant the introduction of number conservation status for all of the

⁴ In 2006 it was believed that a moderate improvement in utilisation rates, from the current average of 15 per cent of available numbers to about 30 per cent, would reduce the number of geographic areas currently at risk of number shortages from 34 to zero. *Telephone Numbering: Safeguarding the Future of Numbers para 1.20*

⁵ *Telephone Numbering: Safeguarding the Future of Numbers para 1.23*

remaining geographic codes. We refer Ofcom to our more general comments above relating to our concern with the current status of Ofcom's policy.

Question 2: (directed to communications providers) Since we conducted our impact assessments on conservation area policy in 2006, are there any changes to the costs and impact on networks of implementing conservation measures that you want to make us aware of? If so, please set these out in your response, explaining the nature of the costs and/or constraints and any possible steps to overcome or reduce these.

The introduction of number conservation measures remains the lesser of two evils for Cable&Wireless – the impact upon our legacy PSTN switches vs. the competition constraints introduced by the use of overlay codes. The biggest concern we have relates to our switch resource utilisation and in particular the limited availability of decode for routing numbers. For small Communication Providers that merely require a “presence” in a particular geographic area, the choice of 1k or 10k block allocation will not fundamentally impact on the number of blocks assigned. However, for larger Communication Providers, inherently a single 1k block will be insufficient to fulfil demand hence multiple blocks will be required. The consequence of this ripples to all other Communications Providers, because more resources will be required both from a network and human standpoint.

Where a single 10k block is cleanly allocated the whole block can use the same network resource however this will not necessarily be the case for multiple 1k blocks. As a provider of services to large corporate companies it is likely we will need to order multiple 1k blocks for any new customer allocations. This is further compounded where the allocation of numbers are not consecutive.

Cable&Wireless' switch resources in this area are finite and whilst we believe that we are able to cope with the increased number level of decode, it will require our network switch

teams to carry out a number of changes in order to ensure the network is able to cope with the additional requirements. We request that Ofcom provides an implementation period of between two and three months from publication of its statement before allocating these new 1k blocks in order for this work to be completed.

Further, although we recognise that Ofcom are constrained in what can be achieved, we request that careful consideration be given to allocation policy for 1k blocks. For example;

- The F digits 0, 1 and 9 are undesirable for allocation in a corporate context because our customers typically use their numbering for DDI applications.
- Large Communications Providers must be able to secure multiple 1k blocks in a given area simultaneously where this is demonstrable demand.
- Where a Communications Provider – particularly one serving corporate customers – is assigned a series of 1k blocks, it is preferable if the “adjacent” blocks are held such that they’re not allocated until no others are available. This means that where the 1k blocks are used for DDI applications, the possibility for customer expansion is not capped-off until it has to be.

We recognise that Ofcom has implemented such measures in existing conservation areas, but it is all the more important now that the almost the whole country is under the regime.

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