

BT response to Consultation on “A three-digit number for the national power cut and electricity network safety service”

BT welcomes the opportunity to comment upon Ofcom’s proposal to allocate access code “105” for the reporting of electricity supply emergencies. In principal BT supports Ofcom’s proposal but believes that some further clarification is required to ensure the successful deployment of “105”.

BT notes the geographic diversity of the electrical distribution system, and the potential limitations of being able to route calls to the correct entity running a particular distribution network in a given area. To ensure that such limitations are overcome, BT believes that calls that are made using “105” would be best served by routing such calls to a central, single location, rather than to each of the distribution companies. This would facilitate the implementation of the service and reduce costs. This appears to be the implication in the description of the service but can Ofcom clarify that this is the intention?

BT notes that Ofcom has not included aspects of other communications issues, such as the price of calling the service or the provision of access to the service, and these are expected to be resolved through commercial negotiation between the provider that ENA selects to run the service and other communications providers (CPs) who originate and carry calls to 105. BT supports the reliance on commercial negotiation in this way, and recognises that such negotiations will need to cover various aspects of access, and associated costs.

Question 1: Do you agree with Ofcom’s proposal to designate 105 for “Access to the national power cut and electricity network safety service” in the Numbering Plan? Please state your reasons.

BT agrees with Ofcom’s proposal in principle. The rationale presented in the consultation identifies a requirement for such a number and evaluates the various options that could provide access. Whilst other options, such as a Freephone number, were considered, and may have provided easier implementation, the simplicity of use of an access code in a possible life threatening situation was significant.

Noting that there are still implementation issues, including the need to set charges allowing full costs recovery, BT believes that, in order to ensure that such a limited numbering resource is used in the most efficient way, all consumers and businesses should benefit from the new service and therefore access to the code should be mandatory from all Communication Provider networks, who should also be able to recover their legitimate costs.

Question 2: Do you have any comments on how we consider that we have met the legal tests and/or on the proposed modification to the Numbering Plan set out in Annex 2?

BT has no comments.