

Net Solutions Europe's (NSE) response to Ofcom's consultation on Geographic telephone numbers

About NSE

NSE is a small/medium sized managed infrastructure and telecommunications business providing mission critical, stable and scalable solutions to medium and large corporate market space. Over the last 15 years, we have expanded and developed an impressive customer portfolio with clients based in the UK, Europe and the United States.

Summary

In reviewing Ofcom's proposals, NSE agrees with a number of the solutions that have been proposed, but have severe reservations regarding the proposal to charge for geographic numbers. In particular we would like to highlight the following:

Local Dialling and Overlay Codes:

NSE agrees with this principle and would advocate the closing of local dialling and the adoption of overlay codes (if necessary) as the most suitable and least troublesome way of increasing the number supply.

Changes to the Administrative Process:

Whilst NSE can see the benefits of some of the proposed changes to the Administrative process, we feel that the current laborious, complicated and slow implementation process imposed by BTW would make any proposals difficult to implement and administer fairly without inducing undue stress into the process.

Smaller number ranges:

NSE would wholeheartedly welcome the option of receiving allocations of less than 1,000 numbers per block. All of our switches are capable of routing down to the single number level and we do not require the 10,000 number blocks or even the 1,000 number blocks in many of the areas we currently cover. Whilst we understand the delays in NGN deployment make the practicalities of smaller allocations somewhat problematic, NSE would strongly encourage Ofcom to push for the allocation of geographic numbers in blocks of 100 where possible, preferably in conjunction with the implementation of a fully automatic allocation system to reduce the burden placed on Ofcom in the process.

Charging of Geographic Numbers:

NSE is fundamentally opposed to the concept of charging for geographic numbers. We firmly believe that there are other less onerous options, particularly smaller allocations, which should be used to ensure that the UK maintains an adequate supply of number ranges. We do not believe that a charging model (even within specific areas where numbers are scarce) is required and feel that in a business such as ours, especially if we are unable to hand back number ranges of less than 1,000 number blocks, it would adversely affect us to the point where we may withdraw from the sector completely.

NSE would also question whether the introduction of a charge is proportionate to what the proposals are intended to achieve. We believe that number conservation is achievable without having such a significant impact on businesses such as ours. NSE would

suggest more resource be directed at analysing how the introduction of 100 number allocations could be achieved, as we believe that this is a more suitable approach than initiating a pilot charging scheme over an 18 month period.

Sub-allocating Numbers:

NSE does not feel that Sub-allocation would work well for our business and believe it would reduce our ability to innovate and react in an agile manner to market conditions. Of particular concern are the additional problems concerning number portability and the pre-allocation of ported numbers.

Consultation Questions:

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?

NSE accepts the principles of taking steps to ensure the availability of geographic numbers whilst minimising disruption to end users, however we vehemently oppose all elements of the charging proposals and feel that any such proposal would drive smaller providers (including ourselves) out of the market and provide yet further barriers to entry for new providers.

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

No, NSE would not oppose moves that would change numbers.

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

NSE believes that it is appropriate to focus on the local solutions in order to resolve the problems in that area.

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?

Yes

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.

NSE agrees with the closing of local dialling as it is the step which will have the least impact on consumers. NSE also agrees that an overlay code should only be considered if the supply of local numbers fall below a certain level.

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

Smaller units of allocation.

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.

NSE agrees with Ofcom's proposal.

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

Smaller units of allocation.

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

Yes.

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

No.

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?

6 Months

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?

Approximately £10-15k (One off)

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?

Yes, with the obvious caveat that legacy networks (MOs, BTW etc.) are willing and able to route them.

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?

None

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))

No, Ofcom should encourage a wider development of 100 number block allocations.

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?

Full control of our number ranges is key to the agility that NSE rely upon. We believe that 100 number allocations is a much better long term solution than sub-allocation.

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

NSE thinks that this proposal is good and makes sense.

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

NSE objects in principle to additional audit requirements due to the additional burden placed on already thinly spread resources.

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

NSE does not agree that a charging regime should be introduced at this stage. NSE believes that the suggestions are unnecessary, disproportionate and potentially damaging to specific sections of the industry.

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?

No, instead NSE believe you would see a large number of currently successful business pull out of the sector completely.

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

NSE disagrees with the principal of charging for number ranges to conserve geographic numbers. We do not feel that this is required at this stage and feel that there other options (included within this proposal) to fully investigate before even considering a pilot charging scheme.

Questions 22 -25

NSE does not have a position on these questions as it fundamentally disagrees with the general principal of charging.

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.

NSE is opposed to the charging principle and disagree with the concept of charging for any form of numbering, including golden numbers.

