

Elizabeth Gannon  
Competition Policy Manager  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London  
SE1 9HA

15 June 2012

Dear Elizabeth,

**Re: Simplifying Non Geographic Numbers Consultation: Detailed proposals on the unbundled tariff and Freephone**

Thank you for the opportunity to comment on these proposals.

Northern Gas Networks (NGN) is the licensed gas transporter for the North of England. We are responsible for the safe and efficient delivery of gas to 2.6 million homes and businesses in West, East and North Yorkshire, the North East and Northern Cumbria. As a Gas Transporter we are licensed by the Gas and Electricity Markets Authority under section 7 of the Gas Act. Under the terms of the Gas Transporter's Licence, Conditions A8 Emergency Services and Enquiry Service Obligations we are required with other such licensees to establish, operate and maintain a single continuously manned telephone service in order to receive calls on any matter or incident that may cause danger or requires urgent attention in relation to gas conveyed through pipes, or involves escapes of gas, or emissions of carbon monoxide from gas appliances. We currently contract out the provision of this telephone service to National Grid who operate the National Gas Emergency Helpline.

The Helpline service is designated by the licence as without charge at the point of use in order to encourage calls by members of the public to minimise risk to life and property and was established prior to the widespread use of mobile phones. NGN recognises that in some cases, members of the public could be discouraged from making a call to the helpline if they believe they will be charged. For example, customers who have pay-as-you-go mobile phones with zero credit cannot dial the freephone number under the current regime. Zero rating of these calls would ensure anybody can call the Gas Emergency Helpline without being charged.

We support Ofcom's comments made in Part A paragraphs 4.42 and Part C, Appendix 20, in that the Gas Transporters have attempted to contact mobile operators requesting that they zero rate calls to the helpline with limited success, so the proposals made in this consultation are welcomed by NGN. We believe the Ofcom proposals will reduce the risk of customers with mobile phones being dissuaded from reporting a gas escape or emission of carbon monoxide.

For the reasons outlined in this letter, and the points made in our previous response, NGN remains of the view and supports Ofcom's proposals to zero rate 0800 calls from all telephones, fixed and mobile operators. We note that Ofcom will have consulted on all issues and made a final decision by the end of 2012, with an 18 month lead time to

implement all the changes, into 2014. NGN would like to request that this timeline be accelerated so that the Emergency Services and Enquiry line can be truly free at point of use to all callers as soon as possible.

Should you wish to discuss any of the points made in this letter please do not hesitate to contact myself on 07883 099609 or at [sparker@northerngas.co.uk](mailto:sparker@northerngas.co.uk).

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Parker', with a stylized flourish at the end.

**Stephen Parker**  
**Regulation Director**