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Office of Communications
Riverside House
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2nd May 2012

Dear Elizabeth,

KCOM response to Geographic Telephone Numbers Consultation

KCOM Group PLC (KCOM) welcomes the opportunity to respond to the consultation regarding the future of geographic numbers. In Hull and East Yorkshire, KC provides a range of communications services to businesses and consumers. Our comments in this response are predominantly focused towards the Hull area.

KCOM believes the impact of closing local dialling in Hull (01482) will be more pronounced than in the rest of the UK area codes due to the absence of a wider choice of fixed line providers for residential consumers in the Hull area. Although KCOM agrees with the Ofcom decision to close local dialling in four digit area codes is the appropriate response generally for the UK geographic numbering scheme we consider the Hull area warrants specific review. Hull has one of the highest population densities outside of London¹ and we need to ensure that Hull residents are not unduly disadvantaged compared to residents in the rest of the UK.

The volume of local calls made within Hull is significant; we believe our customers value the local dialling facility and that it's worth preserving for as long as possible. In addition we anticipate residential consumers will perceive the closure of local dialling in Hull as being caused by KC although this is clearly not the case.

There are 85 different range holders in the Bournemouth 01202 area code, in which a significant number of fixed line providers and alternative service provisions exist. In comparison there are 111 different range holders for the Hull 01482 area code.

In our opinion a specific review of the Hull area code is warranted and we request a different approach to addressing number scarcity issues in Hull such as 100blk allocations for 01482 that we would like to explore with Ofcom and Industry.

Our responses to the specific questions listed in the consultation document are detailed below.

¹ Source http://www.hullcc.gov.uk/portal/page?_pageid=221,147225&_dad=portal&_schema=PORTAL



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Question 1: Do you have any comments on:

- i) our proposal to close local dialling in the Bournemouth 01202 area code on 1 November 2012;*
- ii) our view as to how the proposed modification to the Numbering Plan in relation to closing local dialling in the 01202 area code on 1 November 2012 meets the relevant legal tests in section 60(2) of the Act; or*
- iii) the proposed modification to the Numbering Plan in relation to closing local dialling in the 01202 area code (set out in Annex 7)?*

KCOM agrees with the proposals to close local dialling in Bournemouth on 1 November 2012 and the modifications to the Numbering Plan for such.

Question 2: Do you have any comments on:

- i) our view as to how the proposed pilot scheme meets the relevant legal tests in section 47(2) of the Act; and*
- ii) the proposed amendments to GC17 to implement the pilot scheme (set out in Annex 8)?*

Ofcom offer the assumption that CPs will offer nationally averaged prices by spreading the number charge costs across their national fixed line customer base; however KC offers this does not apply for the Hull area. If number charging applies to the Hull area code (currently close to being captured in the top 30 area codes) then all of KC consumers will face an increase in prices in just the one area code subject to charging.

In section 4.154 of the consultation document Ofcom estimate the average increase in line rental would be approximately 6p per exchange line per year. KC estimate the increase in line rental charge in Hull will be higher than 20p per exchange line per year.

KCOM appreciates that the Ofcom proposals are aimed at addressing the overall UK geographic numbering scarcity issues and the aim to include area codes in the pilot based on an equal criteria. However KC believes the specific impact on Hull warrants additional consideration prior to the inclusion of 01482 in the pilot charging scheme.

KCOM believes that Ofcom should progress revisions to administrative measures in conjunction with the overall package of measures to address geographic number scarcity. We urge Ofcom to undertake a formal audit and enforce the return of unused ranges prior to establishing the confirmed list of area codes to be included in the pilot charging scheme. Given the f-digit permissions notes on the SNS for some 10k range holders in Hull, there are potentially 43 unused 1k blocks.

Question 3: Do you have any comments on:

- i) our proposals to make 100 blocks of 100-numbers available for allocation in the 11 five-digit area codes;*
- ii) our submission of how the proposed modification to the Numbering Plan in relation to 100-number blocks meets the relevant legal tests in section 60(2) of the Act; or*
- iii) the proposed modification to the Numbering Plan in relation to 100-number blocks (set out in Annex 7)?*

KCOM agree with the proposals for the allocation of 100-number blocks in the 11 five-digit area codes and believe Ofcom should consider implementing 100 block allocations for the Hull area.



KCOM Group PLC

Question 4: Do you agree with our proposed approach for ported and WLR numbers? If not, please explain why you disagree.

KCOM agrees with Option 5 for ported numbers however we believe that WLR numbers are very similar to sub-allocated numbers where Ofcom suggests CPs can reduce the impact of charging by sub-allocating numbers and charging for such. For the sake of reduced complexity for the pilot we agree that the recovery of number charge costs through WLR pricing may not be warranted. KCOM expects the approach for WLR numbers will be revisited if number charging is adopted beyond the pilot.

Question 5: Do you have any comments on the proposed administrative arrangements for number charging in the pilot scheme as set out in paragraph A4.37?

KCOM agrees with the proposed administrative arrangements however we question the treatment of charges when an allocated number range transfer occurs (to a new range holder) in a charge period. Where all numbers in an allocated range are in use by one end user, number range transfers can be more appropriate than the use of number portability.

If you require any further information please do not hesitate to contact me.

Yours sincerely

Lesa Green
Numbering, Interconnect and Regulatory Manager



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