

As a general citizen-consumer, I am responding to Ofcom's consultation *Telephone Numbering – Safeguarding the future of numbers*. I have chosen to answer some of the questions below.

*Question 6 Do you agree that the use of overlay codes is the best backstop approach in the event that extended conservation measures are not sufficient to meet demand for geographic numbers?*

I prefer to see code changes in the few areas, like Brighton, that are at risk of exhaustion. There must be enough spare three digit codes beginning with 1 and 2 to cover these 'at risk' areas. This was done for areas that now have 011x codes, so what is different now?

Take Brighton as an example. All local numbers could be prefixed with a 9 and given a new code such as 0221; so 01273 567890 will become 0221 9567890. Rather than withdrawing the 01273 code completely, perhaps it would be technically feasible to keep it for now. It will allow all current numbers to be called with the code, as they always have been. So the above example would also be able to be rung on 01273567890, as well as the new number. All local numbers would, presumably, have to be dialled with all seven digits.

Whilst this could lead to confusion and people being unwilling to adopt the new numbering, it would mean that businesses would not need to update numbering immediately on their stationary, vehicles and so on.

I think that overlay codes should not be implemented because, in practice, there would be so few numbers in existence on the new code, relative to those on the old code, that I doubt people will recognise it. It would also defeat the point of being able to dial numbers locally, if all subscribers had to dial the code as well.

If overlay codes are to be adopted, I suggest that similar prefixes to the one already used are preferable. For example, Brighton could also have 02273.

*Question 7 Do you agree that Ofcom should continue to respect the geographic identity of numbers until consumer understanding of the impact of technology change evolves further, and what do you consider is the best way to develop that consumer understanding?*

I think that the understanding by the vast majority of consumers comes from the use of telephone numbers. This can be seen with the common misunderstanding that 070 numbers are seen as mobile telephone ones.

I therefore think that it would provide more clarity if geographical numbers were only permitted for fixed landlines. This would prevent them from being used for VoIP services, although the advantage of allowing them to be used

for VoIP lines would be that callers are familiar with them and won't be apprehensive about calling 05 (or whatever prefix) numbers.

*Question 8 Do you agree with Ofcom's proposal to open a new '03' number range for non-geographic, non-revenue sharing services?*

I am strongly in favour of such a number range. It has the advantage that it is as close to geographical numbers as it could be. Providing that there is sufficient space within the 01 and 02 ranges for all geographical numbers, I think that the 03 prefix will be an excellent choice.

*Question 9 How should the '03' range be structured, in terms of tariffs and services?*

I would like to see all 03 prefixed numbers charged at the same rate. No anomalies should be permitted. A subscriber should be charged the same rate as he/she would be to call a number within their local area (where a local and national distinction exists).

My reasoning behind this is that I cannot see what benefit a service provider would receive by selecting a national rate non-geographical number over a local one. As a consumer I have no first hand knowledge of what goes on, but I can see that if the caller has to pay more, some party somewhere in the chain must benefit, but for what extra 'work', I'm not sure.

Is the terminating communications provider going to charge more for connecting a 03 national call than a local one? Or will the originating provider pay the same to terminate both, but retail the calls at different rates?

Bearing in mind that, from a consumer's point of view at least, the average price of a national call is almost the same as a local one, if an OCP is charged more for national 03 calls, then won't this create an artificial distance barrier that will drive up the retail cost of national calls?

As far as services go, the only services I would like to see separated out are adult ones and dial-up internet ones. It should be possible for all adult services to be barred, and putting them within a separate range would allow this. It may be that some internet service providers may opt for a 03 number. I don't know the likelihood that this would happen, but if they do, I think that it would be wise to allocate them a different prefix to voice services. This would ensure that the current issues with 0845 being mixed voice and data will not crop up in the future.

*Question 10 How should the '08' range be structured, in terms of tariffs and services?*

I have some concerns about the restoration of geographical rates for 0870, and in time, 0845. This would leave them in the middle of the 08 range and

identical, price wise, to the new 03 range. SPs would, thus, have little incentive to move to 03. They would be free to promote their services as costing 'local rate' or 'national rate', just like those prefixed 03. Freephone numbers aside, I believe that this will lead to confusion amongst consumers and businesses alike as to what it costs to call 08 numbers and what they are.

And what happened to Ofcom's view that 0845 and 0870 numbers provide revenue for 'value-added' services? If that's the case, then surely the majority will be happy to stay where they are.

*Question 11 Which broad approach should Ofcom take to structuring the '09' range, and if a re-structured '09' range is preferred how would you arrange the different types of '09' services (e.g., according to price per minute, price per call, inclusion of adult content)?*

I think that the most important step is to ensure that SPs provide accurate pricing information. Forming a 'logical' numbering scheme would be lost on the majority of the population who use these numbers so infrequently.

*Question 12 Should any specific PRS service categories be identified or segregated in order that parents can block access by their children (e.g., sexually explicit content, gambling)? Is there merit in having a general 'adults only' classification, including a range of services to which access might be restricted on the grounds of content, or might consumers wish to apply different rules for different types of content?*

The only premium rate 09 numbers that should be kept apart from other services are those that are of adult in nature. This would serve both as to identify them and to allow for barring them without barring other 09 numbers.

*Question 19 Do you support the proposal to extend the tariffing provisions of the Numbering Plan so that they apply to customers of all providers on all types of network?*

I am strongly of the opinion that tariffing provisions that currently only apply to BT retail customers should cover all providers. For the pricing 'rules' only to apply to BT seems to go against encouraging competition, especially as it has a large market share. Only applying the provisions to BT leaves other providers free to charge more 09 premium rate numbers, for example, knowing that the vast majority of subscribers will not check the pricing list.

Ideally, I would like to see all chargeable 08 services and all 09 premium rate services charged at the same rate across all providers of all types. This would allow SPs to provide accurate pricing information for calling their telephone numbers.

If the preferred solution excludes some OCPs like mobile networks from these provisions, then it is likely that they will charge more than the standard retail price. This would allow the confusion to continue, where consumers infrequently check price lists and dial anyway.

To simplify pricing for customers of those excluded originating providers, they could be made to charge the standard rate plus a surcharge rate. Assuming that the standard retail price is to be displayed next to the number, the caller would only need to know what surcharge their provider applies. So a provider that charges a surcharge of 25 pence per minute or per call would charge 35 pence per minute to a service that is priced at 10 pence per minute.

This would have the advantage that it provides clarity for consumers whilst allowing telcos to set their own call rates. SPs could display pricing information, for example "Calls cost 10p/min plus a surcharge that may apply depending on your provider."

*Question 20 How do you think the new Numbering Plan could be effectively communicated to consumers?*

The telephone directory could contain a brief outline of the Plan, so as to not 'overload' the reader with too much information. A similar guide could be provided with telephone bills. Both of these could refer the reader to a new consumer orientated website covering telecommunications issues such as what different numbers mean and how to complain about telcos and SPs. It could be 'branded' in a similar fashion to DTI's *Consumer Direct* service.

The new definitions should be adopted by telcos on their bills. For example, where calls are itemised, it should give the call type, such as 'Premium Rate'.

*Question 21 What are your views on Ofcom's analysis and the different options for number charging?*

As a general consumer, I am concerned that such charges will simply be passed back to me. This will negate some benefits of competition and act as a stealth tax. This should be considered when deliberating imposing charges for numbers.

It also strikes me that measures like allocating in them in 1k blocks should take priority over charging a higher price where numbers are scarcer. This 'efficiency charge' may also seek to drive out competition, as smaller providers may be less able to cover these costs. In any case, it means that all those providers who wish to operate in an area cannot do so, despite the fact that geographical number utilisation averages at a meagre 15%.

*Question 29 Do you agree that to improve number utilisation and, if we do, how would stakeholders be impacted and what practical issues are involved?*

For geographical numbers, it would seem that the allocation of 10k blocks to many smaller CPs is a waste of numbers. A consequence of this may be the implementation of wide area codes. This will have a great impact on all UK telephone users and it cannot be allowed to happen.

I think that CPs should utilise numbers in 1k blocks where they won't require that many. The suggestion that numbers could be allocated in 10k blocks but providers restricted to 1k block(s) within them seems to be the best solution. It would allow numbers to be used more efficiently, something that has apparently been lacking previously.

*Question 31 What are your views on closing the scheme, and Ofcom's assessment of it, as a fallback option to increase number supply?*

I am concerned as this will affect consumers greatly. Those who have little understanding of technology, the elderly especially may be confused by such changes. For those relatively few areas that have allocation shortages, other measures should be implemented. I refer the reader to my answer to Question 29, above.

What's more, this could signal the beginning of the end for geographical numbering as a whole. It would also expose an even greater inefficiency whereby callers would (for the majority of numbers) dial 11 digits, including the leading zero. Thus, dialled numbers would only begin 0, 1 or 999; an incredible waste of capacity, as well as inconvenience of dialling extra digits.

*Question 32 What are your views on wide area codes, and Ofcom's assessment of them, as a fallback option to increase number supply?*

I would prefer wide area codes over closing the scheme, but such a move would still result in a much wider area being affected than has a problem with shortage. My much preferred option is the introduction of new three digit codes for places like Bournemouth, like happened in Bristol and Sheffield in 1995. Why is it that this does not appear as one of the options in the consultation document?

*Question 34 Do you agree with Ofcom's assessment of the problems with current 08 and 09 in terms of information clarity and consumer perceptions?*

I strongly agree with the sentiments expressed in paragraph A2.17 about considering the wider picture. As a consumer who knows the actual price of calls to geographical numbers and 084/087 numbers, I avoid the latter where possible by calling such companies on geographical numbers

*Question 35 Which of these options for current 08 services do you think is best in terms of a) increasing consumer transparency and b) minimising the costs of re-structuring the 08 range?*

As I have written previously, I am strongly in favour of a geographically charged 03 number range. This would help set apart those numbers that are revenue sharing and those that are not. There should also be no separate local and national rates number sub-ranges within 03.

Growth of geographically price services could be accommodated on 03 numbers, so there would be no need to permit the continued allocation of such services in the 08 range. Indeed, if 0845 and 0870 were to be geographically charged, allowing new services to start up would only add to the potential confusion where non-revenue sharing services reside within numbering for those that do revenue share.

On balance, I would like to see 0845 and 0870 charged geographically, as 03 would be. These would be legacy ranges, and hopefully over time SPs will move over to 03 numbers.

*Question 37 Is it more important to indicate price per minute or price per call, and does this vary for different types of PRS service? What granularity of PRS tariff information should be given to consumers by the Numbering Plan?*

I believe that it is equally important to indicate prices for all 09 premium rate numbers. That way consumers can make clear a decision as to whether they want to use a particular service or not.

I think that, for the majority of consumers, the individual sub-ranges within the 09 range are irrelevant. That is not to say that arranging the numbers in a logical pattern wouldn't be welcomed.

All things considered, I prefer option 3b as it gives the clearest guide to pricing by relating that to the second digit in the prefix.

*Question 38 Should there be any PRS number ranges with no tariff ceiling?*

Most definitely not. The higher the call rate the more potential there is for consumer abuse.