

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Telephone Numbering (Safeguarding the future of numbers)

To (Ofcom contact): Andy Montaser

Name of respondent: Jason Waghorn

Representing (self or organisation/s): self

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing	<input type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?yes

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Name

Signed (if hard copy)

Annex 10

Consultation questions

Questions from Sections 1-5

Question 1 *What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions?*

Ofcom is supposed to be there partly at least as consumer champion - I'd like to see Ofcom ramping up that role because thus far you have allowed BT to abolish plain old line rental and force "Option 1" on us all, you've allowed BT line rental rates to rise still further in another inflationary rise. DO SOMETHING FOR THE CONSUMER FOR ONCE

Question 2 *What do you think are consumers' key current views on numbering, how do you think those views will change, and how should Ofcom's current decisions take those changes into account?*

Consumers want transparent cheaper calls. Full stop.

Question 3 *What do you think are the main ways in which technological developments will change the focus of numbering policy decisions, and how should Ofcom's current decisions take these developments into account?*

Disallowing any revenue share, disallowing any ambiguity to creep in. If it costs more than a regular inland call it should be in 07 (if it's a mobile) or 09 if it's premium. 08 reserved for free and numbers really charged at (or below) suppliers inland rates.

Question 4 *Do you have any comments on Ofcom's assessment of the current challenges to the Numbering Plan, in terms of a) number availability, b) transparency, or c) consumer abuses?*

Try the NANPA idea of area code overlays rather than massive upheavals and code changes - seems to work in US/Canada

b) Until the assinine and unwelcome 0870 & 0845 calls being charged at BT national and local rates is fixed there is no transparency.

c) 0870 lines for call centres *is* abuse of the consumer. Time to end it has passed. Get on with it.

Question 5 *Do you agree that the extension of conservation measures is the best approach to take before the impact of NGNs eases the pressure on geographic number demand?*

No - see above - it's not beyond the wit of man to try the NANPA overlay idea.

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?*

Absolutely

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?*

No consumer wants to dial 10/11 digits to get to their nextdoor neighbour - keep it that way.

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

I agree with the idea - but feel 03 would better serve geographic overlay. 05 or 06 would be better for this.

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

It should be rate capped at your providers national rate - not BT's arbitrary national rate which no-one actually pays.

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

It should be rate capped at your providers national rate - not BT's arbitrary national rate which no-one actually pays.

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)?*

tiered:

*cheapest 090x to most expensive 097x
gambling 098x
adult 099x*

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?*

all barred by default. Consumer required to get it opened in writing.

Question 13 *Are there any practical means by which the Numbering Plan could provide improved mobile tariff transparency?*

Turn it on it's head - make the called party pay.

Question 14 *Do you agree that personal numbers should have a tariff ceiling (or recorded message) to restore trust in those numbers? If so, what level, and should that ceiling include the cost of recorded messages?*

Recorded message should be standard on all calls. Consumers should not be expected to remember every one of the rates applicable to calls

Question 15 *Do you agree with Ofcom's proposals to move personal numbers (with the same consumer protection provisions) to the '06' range and to pursue the direct allocation of numbers to end users as proposed at some point in the future?*

No. Leave them where they are. Add a tariff recording need.

Question 16 *Do you have any comments on the use of the 05 number range?*

05x for the replacement for 0870 if you really must shift it.

Question 17 *Do you agree that Ofcom's overall proposals for a future Numbering Plan are coherent and comprehensive, and do you have any comments on the timescales in which the changes should be implemented?*

As usual I feel OFCOM are acting half-assed - look at where you want to get to and get there instead of fannyng around with part measures. Remember Joe Public is out there and hasn't got a clue that 0870 is different to 0871

Question 18 *Do you agree with the principle of using consumer protection tests in numbering in order to limit consumer abuses, as long as the relevant legal tests are met? Do you have any suggestions for what tests would be appropriate or any conditions that should be met to pass such tests?*

It should not be a legal test - but a moral one - if there is any intent to deceive - like currently with 0870 numbers being charged at a 'national' rate that no-one in the country actually pays.

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?*

Absolutely. With the proviso that no inland fixed line call costs more than it does to it's geographical equivalent.

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

You could tattoo it on the inside of their eyelids - most consumers are not interested and will only complain when something actually changes.

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

Flawed and industry-led - get out of your ivory tower and talk to some real consumers

Question 22 *Which, if any, numbers might appropriately be allocated using a value-based charge?*

None at all.

Question 23 *Do you have any other comments on Ofcom's proposals for numbering as discussed in Section 5, or any other suggestions for how Ofcom might revise the current Numbering Plan or its administration?*

Detailed questions from Annexes 1-5

Question 24 *What do you think of Ofcom's proposed general approach to managing geographic numbers?*

Question 25 *Do you have detailed evidence or suggestions on the variables likely to influence demand for geographic numbers, how those variables will change over time, and how Ofcom should develop a demand model?*

Question 26 *Do you agree with the specific proposal for how to extend conservation measures, including the extension to areas with a number shortage predicted in the next five (rather than two) years?*

Question 27 *Do you consider there to be any upper limit, in terms of technical feasibility, on the number of areas in which conservation measures could be used?*

Question 28 *Do you agree with Ofcom's assessment of the impact of conservation measures on stakeholders?*

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

Question 30 *What are your views on overlay codes, and Ofcom's assessment of them, as a fallback option to increase number supply? What should be the maximum number of areas where overlay codes are introduced?*

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

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

Question 33 *Might wide area codes be appropriate in regions with a strong identity and, if so, which specific regions are suitable for wide area codes?*

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?*

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?*

Force a price change and a tariff message on every call.

Question 36 *How might early migration to the '03' range be encouraged?*

Don't do it - you're shooting yourself in the foot as we're already running out of capacity in 01/02 and will need to move into 03 for geographic.

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?*

Price per minute. If you want to be really bold but a price cap per call on it. But BOLD and OFCOM are mutually exclusive terms.

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

Absolutely not. I already hear of occasions where burglars leave phones dialled to the speaking clock in the US - I don't want them setting up PRS numbers and dialing those whilst burgling to net a bit more cash from the victim (I've seen a similar fraud work in Belgium)

Question 39 *What is the typical turnover of 09 numbers, and what does this mean for migration timescales to a new 09 Plan? How could Ofcom structure the 09 range or take other steps to promote voluntary migration of 09 services?*

Question 40 *Do you agree that that part of the 07 range which is currently unused (071-075) should be reserved for mobile services, with the aim of establishing 07 as a mobile 'brand'?*

Yes and keep personals in 070 - extending the numberlength if need be. Enforce tariff message. Explore called-party-pays on both personal and mobile numbers.

Question 41 *Should Ofcom reserve specific sub-ranges within the 071-075 range for new mobile multimedia services, in the interests of promoting consumer awareness and tariff transparency, and if so how?*

No.

Question 42 *Do you support the use of 100,000-number blocks in allocating mobile numbers to new mobile voice providers?*

Yes

Question 43 *Based on the above analysis, if Ofcom were to introduce a charge ceiling on calls to 070 numbers, which of the following levels should be adopted; i) 10 ppm ii) 15 ppm iii) 20 ppm iv) something else ?*

Explore called-party-pays on both personal and mobile numbers.

Question 44 *Would a requirement to make tariff information clearly available to purchasers of personal numbering services at the point of sale, either in addition to, or instead of a call ceiling, be an effective means of providing tariff transparency on personal numbers?*

Not really - people who are buying them are unlikely to call themselves. Tariff announce or explore called-party-pays on both personal and mobile numbers.

Question 45 *If a new sub-range is made available for personal numbering services, how long should the current '070' sub-range remain available for existing providers, in order to minimise migration costs?*

No more than 3 months.

Question 46 *What issues do you think would need to be resolved before Ofcom makes individual numbers available for direct allocation to end users?*

How anything is charged to the calling party. Calling party should not be expected to foot the bill for the called party deciding to use a service like PN.

Question 47 *What do you consider to be the main strengths and weaknesses of the current rules-based system of UK number allocation?*

Strength - generally you know that 01/02 is a fixed line and will be relatively cheap - anything else is a lottery.

Question 48 *Do you agree with these principles for number charging?*

Question 49 What are your views on Ofcom's assessment of the issues to be considered in setting and reviewing number charges? For example, should other issues be considered in developing charging proposals?

Question 50 Do you agree that charging for numbers could disincentivise economically inefficient behaviour, and incentivise economically efficient utilisation?

Question 51 What internal changes would communications providers have to make, and at what cost, to support charging for numbers? Would these changes be preferable to earlier and more widespread use of conservation measures and (limited) changes to increase geographic number supply?

Question 52 How might existing number allocation rules be reduced if charging for numbers was introduced?

Question 53 What are your views on this illustrative charging mechanism, and would you suggest any changes or alternatives to it?

Question 54 How would charging for number blocks affect consumers?

Consumer will inevitably pay through the nose for it.

Question 55 What impact do you think charging for numbers would have on sub-allocation? Should Ofcom encourage or facilitate sub-allocation and, if charging were introduced, would changes be needed to the process of sub-allocation to facilitate trading?

Question 56 Which types of consumer abuse do you think Ofcom should particularly attempt to address through its numbering policy decisions?

Move regulation of 0870/0871 to ICSTIS soonest - prevent companies from allowing queues on these premium rate number - after all paying 7.51p/min versus 3p/min is a 4.51p/min premium (using the OED definition of the word "premium" here)

Question 57 Which number ranges and types of originating communications provider do you think should be covered by an extension of the Numbering Plan's tariffing provisions? What practical issues are involved, and how would this vary according to the number ranges and service providers involved?

Directory Enquiries - the opening up of the market has been a right shambles - it needs sorting sooner rather than later.

Question 58 What do you think of the potential conditions proposed by Ofcom for inclusion in a consumer protection test for number allocation, including the proposals that numbers should not be provided to anyone with a particular track record of persistent and/or serious consumer abuse?

*Numbers should not be provided to anyone with a track record, anyone found selling them on or buying on behalf of such a person should be treated in the same way and lose *all* numbers they have allocated.*

Question 59 Are there any other circumstances in which it may be appropriate for Ofcom to refuse number allocations?

Where it is not in the consumer interest - ie. consumer helpdesk or call centres should never be charged at more than a geographic 01/02 national call

Question 60 Would you support the use of a consumer protection test as a basis for withdrawing number allocations? What kind of considerations should Ofcom apply in any such test, and what would be the practical issues involved in applying such a test?

There should be no quarter sought or given. Break the rules, lose the number. End of Story.

Question 61 What consumer abuses do you think might occur in the future, and what steps might Ofcom take now in its numbering policy in order to reduce the potential for such abuses?

Introduce compulsory cost tariffing on all non-01/02/080x calls