

The consultation touches on the designation of 03 numbers, which is not being changed in the current project. These non-geographic numbers are regulated via the Numbering Plan to be linked to the price of a geographic call. If they are called during a time-period when UK geographic calls are included in an end-user's call package, they will incur no charge - in the same way that a call to a UK geographic number will incur no charge at that time.

It occurs to us that, with the changes to the newly designated Unbundled Tariff Numbers, some Service Providers would be interested in using the relevant 0345 and 0370 numbers rather than continue with 0845/0870 numbers, whose charges will need to be explained to customers in a different way after the implementation date for the proposed changes. For some Service Providers and their customers, a move to 03 numbers might be a suitable option, provided that the charging of 03 numbers is reasonably understood by customers. We therefore urge Ofcom to include information and publicity about 03 numbers in the communication plan for the change to Unbundled Tariff numbers, even though the current project will not be changing the way that these numbers are charged.

There was no very high profile communication about 03 numbers when these were introduced a few years ago and we consider that the relatively low uptake of these numbers (acknowledged in paragraph 1.15 of the consultation) reflects the fact that Service Providers perceive that customers are not very familiar with how the numbers are charged. The emphasis on customer communications and raising awareness about non-geographic numbers within the current project seems an ideal time to give a boost to customer understanding of 03 numbers. Currently, inclusive geographic call packages are widely offered by providers and some also include 0845/0870 numbers. After the implementation date, it may be less likely that these numbers will continue to be included in call packages to the same extent, as their access charge has to apply to higher value 09 and 118 calls as well. Thus, as the new framework for non-geographic numbers settles down, we expect that it would be in the interests of consumers for 03 numbers to be a well understood part of the resulting range of options that Service Providers may use as contact numbers.

Question 6.1: Do you have any comments on the notifications in Annexes 14 to 18 and the draft modifications set out within them? Where you disagree with any of the proposed modifications, please explain why.:

SSE has a retail communications business based on a reselling business model - in common with a large number of smaller players in the market.

There is a large amount of material in the consultation documents issued in April about the rationale for the proposed change to non-geographic call service (NGCS) pricing and how this change is intended to be implemented. It is difficult to foresee precisely how this significant industry change will affect resellers, whose interests are not generally represented in any industry gathering on the implementation of change. We have been encouraged that Ofcom has engaged recently with the trade body representing smaller providers, of which we are a member - the Federation of Communication Services - and hope that this engagement continues going forward so that the input from this group of providers is heard during the implementation phase of the project.

Against this background, we provide below a few comments on the proposed amendments to the General Conditions (GCs).

GC14.9(b)

This part of the proposed amendments to GC14 on transparency of information about unbundled tariffs appears to use language used for mobile telephony packages with its reference to 'bundles of inclusive minutes' and 'numbers of call minutes'. For fixed line voice packages, tariffs generally include calls made at particular times of the day or week rather than an absolute number of "included minutes". We suggest that Ofcom reviews the wording here to ensure that it is clear on what the intended effect is for transparency in fixed line packages, as appropriate to the tariff concerned.

GC17.33 and Numbering Condition

There is a difference in the definition of 'Unbundled Tariff Number' between part (x) of GC17.33 - consistent also with the definition in the Numbering Plan amendments - and the new Numbering Condition definition, which may not be intended.

'Non-providers'

This term is used in GC17 and the Numbering Condition; we query whether it needs to be a defined term in both locations.