



Vodafone's response to Ofcom's consultation

The 0500 Number Range

January 2014

Vodafone

Headquartered in the UK, Vodafone is a global business investing and innovating in all the markets we serve to deliver for our customers. Our home market is no exception and Vodafone in the UK has now successfully integrated the former fixed line business of Cable & Wireless Worldwide, resulting in the creation of a genuinely unique converged communications provider. With £2.5M being invested each day in our UK network, we remain committed to delivering the very best for our customers.

Introduction

Vodafone welcomes the opportunity to respond to Ofcom's re-consultation in relation to the 0500 number range. Vodafone has made it clear in previous conversations and bilaterally with Ofcom that its preference is, and indeed remains, for the 0500 range to be treated in exactly the same way as the 080 range and for it to become an identical free-to-all-callers range under the NGCS review. As Ofcom acknowledges this is the favoured option for most Service Providers (SPs).

Rather than repeat our position in this response we refer Ofcom to the previous submission of 03/01/2013¹ and have responded on the basis that Ofcom is determined to proceed with its plan on the stated grounds of ameliorating perceived consumer confusion.

The re-consultation has addressed many of the migration and legal failings which we identified in the original consultation. In particular the introduction of a migration path is welcomed for those SPs who are to be forced from their current numbers and we support the adoption of 080 85- which already has some resonance with both SPs and callers.

We turn our attention to Ofcom's questions in more detail below:

Questions:

Q2.1 Should new replacement 080 numbers – offered to SPs with 0500 numbers in use at present as migration as a migration path away from the 0500 range, prior to the withdrawal of the 0500 range – begin with an 080 85- prefix or with an 080 50- prefix? Please explain your preference.

Those of Vodafone's SPs that have expressed a preference have for the most part stated that it is for the 080 85- prefix. The reasoning expressed behind this choice has almost unanimously been the additional benefits to be garnered from the pre-existing 080 8- numbers. It is felt by many SPs that this offers an option which is already

¹ Made in the name of Cable&Wireless Worldwide

recognisable to callers and will therefore be seen as being more instantly trustworthy to callers.

Q2.2 Do you agree with our assessment of the technical difficulties, and potentially significant costs and disruption, that result from making the proposed 080x migration sub-range available for allocation to all CPs currently hosting active 0500 telephone numbers and that, accordingly, it is appropriate to restrict the allocation of the sub-range to Vodafone during the migration period? If not, please explain your reasons.

Yes, Vodafone agrees that Ofcom's analysis has captured the very real porting, decoding and re-routeing issues that will be faced by operators, and disproportionately Vodafone, were the proposed range to be distributed amongst various operators. We welcome Ofcom's recognition that allocating the entire range to Vodafone represents the most proportionate and pragmatic solution whilst minimising cost and disruption to industry.

Q2.3 Do you agree with the measures proposed to ensure that all 0500 SPs are able to migrate regardless of the CP they use to host their 0500 number(s) currently? If not, please explain your reasons.

We note that Ofcom's proposed measures bear similarities to the existing migration paths offered in relation to the 084x and 034x ranges. Consequently we see no reason why these should not be an appropriate mechanism for migrating 0500 numbers and are satisfied that they represent a workable solution.

Q2.4 Do you agree with our proposal to impose a time limitation of 3 years and 3 months on the allocation of each block of 10,000 numbers within the 080X migration sub-range to Vodafone (C&WW), save to the extent that at least one number within the block is taken up by a migrating 0500 SP (in which case the allocation of that block will not be so-time-limited)? If not please explain your reasons.

Vodafone has no objections to these pragmatic steps on the proviso that other CPs with similarly under-utilised blocks in other ranges, whether geographic or non-geographic continue to have their allocations reclaimed by Ofcom and that Vodafone is not discriminated against in this respect for a situation not of its own making. We note that Ofcom's proposed modifications to Number Allocation forms increases Ofcom's ability to police number adoptions in this respect.

We also ask Ofcom to confirm that should the current number charging arrangements in place for geographic number reservations become more widespread and encompass non-geographic ranges, that special arrangements will be put in place for the migration ranges. It is not Vodafone's fault that we have been stranded with an 0500 number range from which we have been unable to make new allocations, and similarly it is not our fault that utilisation levels within the migration ranges will inevitably be markedly lower than is the norm for 08 for the foreseeable future.

Q2.5 Do you agree with our proposal of a 3-year timeframe for the withdrawal of 0500 numbers and for the migration of active services on these numbers to a new 08X sub-range (if so desired by any individual SP operating an 0500 number)? If not, please explain your reasons.

Vodafone agrees that a three year migration period is reflective of the feedback it has provided to Ofcom from its SP customers. We agree that it seems an appropriate period.

Q3.1 Do you have any comments on the draft modifications to the Numbering Plan, as set out in Annex 8, that we are proposing? Where you disagree with any of the proposed modifications, please explain why.

Vodafone has no further comments.

Q3.2 Do you have any comments on the draft modifications to the numbering application form, Form S8, as set out in Annex 9, that we are proposing? Where you disagree with any of the proposed modifications, please explain why.

Vodafone has no further comments.

Vodafone Limited
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