

***Promoting efficient use of geographic telephone numbers: Review of the pilot scheme to charge communications providers for certain geographic numbers, including proposals to modify General Condition 17***

**Consultation response from KCOM Group**

- Question 1: Do you agree with our assessment of the impact of charging for geographic numbers?
- Yes, the data presented clearly shows a rise in available blocks that was associated with the original hand back of numbers by CPs and then the lower uptake of newer allocations since the introduction of charging. It is therefore reasonable to conclude that making charging is an effective method of controlling the usage of numbers in areas with which have high utilisation.
- Question 2: Do you agree with our proposal to continue to charge for geographic numbers in area codes where scarcity is or is likely to be a concern?
- Charging has proved to be an effective way of controlling the allocation of numbers in areas of scarcity. However we believe that it would be advantageous for Ofcom to conduct periodic audits with CPs in areas which are posing a concern to charging. The data showed that once charging was introduced that CPs returned unused blocks to avoid charging. If Ofcom were to audit companies with a view to potential charging it might well prompt the return of those blocks which remain unused. For areas which have obvious scarcity, charging has proved to be an effective method and we agree that this arrangement should continue.
- Question 3: Do you agree with our proposal that charging should be applied to any area code which is forecast to have 10 per cent or less numbers remaining available for allocation in 2025?
- The list of additional area codes where charging will be applied to contain 10 codes with an 8% or higher forecast. Has the analysis by Ofcom taken in to account the potential for return of blocks in these areas? Given that the trial period found that blocks which were unused by CPs were returned to Ofcom it could be entirely possible that any return of blocks to Ofcom could push these areas above the 10% threshold and push the block out of the charging range. We consider our suggestion that Ofcom could conduct audits with CPs with allocations in these areas as a potential way to avoid unnecessary charging.
- Question 4: Do you agree with our proposal to retain the discount approach for ported numbers and numbers used for WLR and public payphones provided under a USO?
- Yes
- Question 5: Do you agree with our proposals for amending GC17.17(b) and 17.33?
- Yes

