

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: Mr. J. P. Gilliver

Representing (self or organisation/s): Self

Address (if not received by email):

CONFIDENTIALITY

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Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?no	

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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?*

The section is confusingly presented; the repetition of a figure (on pages 4 and 7) does not help. The need for new classes of numbers is not clear since the abolition of the existing ones (in particular 084 and 087), or the removal of revenue-sharing or enforcement of (consumer) price parity with geographical (01 and 02), is not mentioned. In addition, mention of VoIP and NGN suggests, even if unintentionally, an accessibility gap for the less technically able.

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?*

The majority of consumers are ill-informed, especially on costs - many still thinking 0845 is the same as local and 0870 as national, for example. Unless considerable both simplification and education occur, this will not change: the industry's record is not good in either of these respects.

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?*

Technological developments will make it increasingly easy to do almost everything, and as such Ofcom's decisions should not be influenced by claims that certain actions are currently expensive or difficult (e. g. cost announcements).

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?*

Availability - I'm sure Ofcom are on the ball as regards geographical (01/02) shortages; I do not think Ofcom are very good at transparency, and abuses, while I'm sure pursued, are likely to take too long in practice for the majority of "abused" consumers to perceive benefit.

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?*

If you mean allocation in 1000 rather than 10000 number blocks, and the consideration of charging for blocks, then it seems as good a way as any. How NGNs and VoIP will reduce demand is still not clear to me.

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?*

It seems the least undesirable alternative, yes. The introduction of Wide Area Codes - or, basically, a more rational geographical mapping - would be a better solution in the longer term, but if demand is expected to reduce in time (for reasons unclear to me), the disruption involved may not be warranted.

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?*

Definitely maintain geographical identity, even moving - slowly - to a more hierarchical arrangement on a geographical basis (e. g. such that 01245 eventually refers to a region adjacent to that referred to by 01246), though only when major revisions are required, i. e. over 10 years or more. As for enhancing "consumer understanding of technology change", I cannot really see the necessity, at least in terms of making changes to the geographical meaning of numbers.

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

Provided the non-revenue aspect is enforced, and also that all providers are forced to maintain price parity with 01/02, I do not object strongly, though

with the increase I envisage in technological (i. e. rerouting) capability, I question the need for such services, but I have no objection to them.

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

This question assumes a "yes" answer to Q8. In terms of tariffs, it should be the same - via ALL routes - as 01/02 numbers, and also there should be absolutely no revenue sharing with the number holders. In terms of services, I repeat my puzzlement over the perceived need for a separate number range, but if rerouting continues to be perceived as unavailable via normal 01/02 numbers, then 03 seems reasonable.

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

The suggested "080 = free" up to "089 = dearest" sounds reasonable, as long as price transparency is improved by all providers, and 084/087 existing numbers are brought into line (cost wise) with any such scheme (with migration within no more than about two years for those number holders who cannot accept such imposition).

I am not sure what "services" might mean in this context.

ANY revenue-generating section should come under ICSTIS, not just 09 ones.

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)?*

A thorny one! Classification by type is attractive, but if 08 is sub-classified by price, confusion might ensue. Perhaps three ranges should be reserved (099, 098, and 097?) for adult and a couple of other categories yet to be decided, and the rest made contiguous with 08 to give a better clarity of price band.

Some indication - perhaps by the fourth digit being 0? - of whether the service is recorded only or manned, would be appreciated by many.

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?*

Yes to all three questions; I do not see that the latter two are mutually exclusive. Technological development should allow more sophisticated blocking (e. g. of sub-ranges, or even single numbers for that matter) to be implemented.

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

I cannot think of any means, if mobile number portability is to continue to be available, unless internetwork operating at no premium is to be forced onto network providers, which is probably impractical (and possibly undesirable).

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?*

Yes, and such a ceiling should be network independent, with the possible exception of calls from mobiles. The recorded messages should be provided in addition, not as an alternative, though possibly with the subscriber having the option to turn them off.

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?

I can see no objection to it, provided abuse is suitably punished. The provision of such services should not be unnecessarily expensive (i. e. should not approach premium or high mobile rates), to either the caller or the owner of the number.

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

0500: gradual migration. 055 and 056: give consideration to stopping these uses, at least in terms of new allocations, until and unless demand is much greater. (Overall, I believe 05 should be steered towards being unused, like 04, to keep something for future expansion.)

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?

They go some way, though could be tweaked. In today's climate, the timeframe shown should be acceptable - with minor moaning - to most people and companies; in the cases where abuse and/or misunderstanding are occurring (predominantly 08, 09, and some 07), and moves towards the forced migration from 084 and 087 where these do not fit the new proposed 08 structure, a maximum of six months to a year would restore some public confidence.

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?

Yes, though I have some doubts over the practicalities of identifying offending companies/individuals in time.

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?

Yes, most vigorously. The current plethora of different charges is probably the main reason for public mistrust, which extends to a (quite possibly justified) suspicion that telecommunications providers themselves, not just the providers of 08/09 services, are "exploiting by confusion".

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

Plenty of advertising, leaflets in post offices, libraries etc., and a laminated card provided with the 'phone bill nearest implementation. This could take the form of the chart repeated yet again on page 52, except with a little more information on the subdivision of the 08 and 09 ranges. (Ideally, service providers would reproduce the chart with details of their own charges filled in - maybe they could even be obliged to do so.)

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

There appears to have been adequate thought given to the various options.

There does, however, seem to be an underlying assumption that charges will be imposed; since the alleged reason for charges seems to be the perceived shortages in certain areas/services, and there is a perception that demand will peak in the near future, charging should be withheld until and unless it is clear that that is needed. Clawback should be used instead where gross inefficiency (in number use) is perceived.

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

The overall basis on which allocation is made must be considered: is Ofcom the right body to benefit from such money if any? "Memorable numbers" might more appropriately be allocated to, for example, hospitals, information resources, etcetera, than to the highest bidder.

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?*

Only a slight preference for more logical allocation of geographical numbers, to be introduced over a long time period.

Detailed questions from Annexes 1-5

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

Reasonable. (I have a slight preference for more logical allocation of geographical numbers, to be introduced over a long time period, but on the whole Ofcom seem to be OK on geo 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?*

No.

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?*

Yes, but: I _presume_ there is a technical reason why 10k and even 1k blocks are allocated; this is hinted at in the consultation document, but not actually stated anywhere. Therefore the reason why blocks of 100 or even 10 numbers cannot be allocated is not clear.

There is some reference in a _later_ section (a1.29) to "available decode resource"; this _appears_ to be related to exchange equipment - which clearly must be updated if necessary.

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?*

I have insufficient technical knowledge to be able to answer this, other than that if the limitation is due to the "decode capacity" of exchange equipment, the replacement of such equipment in areas of high demand should be a condition of further allocation.

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

I have no reason not to

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?*

Charging per number per year seems fairest, provided reasonable notice is given before it starts - but I think this should not be introduced until it is known whether the predicted peak (and subsequent decline) in demand has been seen. There also needs to be some examination, where a 10k block has been allocated, of whether it has been deliberately "scatter-allocated" to prevent clawback of unused 1k parts, and suitable penalties imposed if this is found.

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?*

They seem one of the least burdensome solutions. Another solution which does not appear to have been considered is that of boundary rearrangement - the use of numbers from an adjacent area which is not overloaded, for new numbers (and forced migration of existing customers near the "border" where absolutely necessary - an undesirable change, but affects fewer citizens than a total renumbering, which would have to occur anyway otherwise).

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 would be against it: I value the ability to local dial. I also cannot really understand why it would be inadvisable to only close it in certain areas, though I still retain my opposition to it as a concept anyway. I would prefer having one extra digit in the number(s), to losing the local dial option.

The resistance to it would, I presume, be highest in areas with the shortest local numbers (longest codes).

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

They sound like a more rational arrangement for the country (though I bet they're not as geographically logical as they might be, e. g. the area covered by code xy5 probably isn't adjacent to the area covered by code xy6, which is a pity if it is the case).

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?*

The north east (though that's already fairly well covered as 0191); possibly others, such as areas of Essex, Kent, ...

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?*

If that assessment is that consumers are confused and resentful, then yes.

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?*

It is unclear to me which of i/ii/iii is closest to "the higher the digit the higher the cost", since all continue to use the terms "local" and "national"; those terms should be banned, and the ban enforced, unless service providers make them truly identical to local and national calls under all tariffs, which since that can mean free calls is unlikely. Whichever is closest to "the higher" would bwe most transparent.

I don't know which is cheapest as far as restructuring goes - to be honest I'm not too bothered about that! Companies who wish to revenue share can take the hit.

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

It MUST be forced on service providers that calls to this range are truly the same as 01/02 numbers, i. e. free under certain tariffs. Once this is widely known, responsible companies/bodies who wish to provide universal numbers at the local rate will need little encouragement. Since revenue-sharing will be banned anyway, the only reason I can see for companies wanting to have a universal number at the national rate is that they want to use this as a way of encouraging callers to get off the line, i. e. to keep calls short; as such, I can't see why there'd be demand - they might as well stay on 0870, since some callers would still get the number free anyway, and thus it wouldn't work as a call limiter!

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?*

Silly question - of course it varies! If a call has a fixed price, people want to know that; if it is open-ended at a price per minute, people want to know that too.

As much detail as possible should be given by the Plan. where the conflicting requirements of tariff and content appear, either the significance of the third digit should be used, or the adult stuff (which is probably the most expensive anyway) should be on the top level (099).

Option 3b seems closest to the above.

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

Definitely not. The telephone billing system is inappropriate for the collection of large sums of money - the question of the obtaining of consent (of the bill payer) is always an open one, and there is also the question of those of limited intelligence not realising.

There is perhaps even scope for requiring that an announcement as every pound is passed be given (with perhaps the option of disabling all but every fifth such announcement by use of the hash key or whatever).

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?*

How should I know?!?

I suspect it is high enough that migration will not be a major problem; I don't see enforced migration being a problem, in that many of the providers of PRS are unscrupulous anyway, or at least would see such enforcement as minor.

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'?*

07 is already de facto so established (with the abuses on 070 already mentioned). Therefore, yes, it would seem sensible to keep it that way (introducing a cap, as suggested in figure A3.1, on the 070 part).

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?*

Provided existing voice usage demand does not exceed the current subsection, it would indeed seem prudent to keep the 071-075 subsection for future services. As for promoting consumer awareness and tariff transparency, that depends on what the new services are: controls on tariffs and transparency are desirable, but short of invoking "the intention to trade fairly" (as mentioned in certain proposed legislation), I can't see how you'd enforce them.

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

This is clearly a question aimed at the industry. Without any mention in the report of any disadvantages of allocating smaller blocks, I see no reason at all why 100k, 10k, 1k, or smaller blocks should not be used.

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 ?*

10 ppm for undisclosed, with a - free (and terminable, i. e. caller has the option to terminate and incur no charge) - announcement if higher, with a 20 ppm ceiling.

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?

No, since the purchasers of such calls are the recipients of the calls, i. e. do not (necessarily) benefit from the cost of the call.

(Since no other box is provided for this, I'll say it here:)

07 is inappropriate for Patientline/Premier, since they're neither mobile nor "personal" numbers; if the enquiry cannot lower their cost, they should be moved to 09 within max. 6 months.

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?

The three years proposed is reasonable, given the original intention of personal numbers, i. e. ones that do not have to be changed. However, any number that has been the subject of an abuse claim (except where found to be maliciously made) should ideally be closed immediately, or at most allowed to continue for no more than six 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?

The trading question already considered; also safeguards against fraud, whether impersonation or location deception. Consideration of civil liberties aspects - such as should someone calling such a number be able to request the location/real number of the callee from the service provider(s), though the same question already exists for mobile numbers.

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

Strength: removes market forces, i. e. those with the deepest pockets don't have an unfair advantage. Weakness: tends to favour large providers as they find it easiest to demonstrate demand. Possible weakness: does not seem to result in very efficient use of the resource.

Possibly a small charge per unused number, announced 6 months or more in advance, might improve efficiency.

(I oppose the introduction of market forces, really.)

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

I don't really agree with the principle of number charging; given that, the principles stated seem reasonable.

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?

A thorough job seems to have been done in considering the question. The one point I see that does not appear to be discussed is whether providers would be permitted to pass on differential costs to consumers - for example, would consumers in an area short of numbers (which is not really their fault) end up paying more for their telecomm.s service? This could be said to be unfair on the consumers; conversely, if differential costs can't be passed on, it could be said to be unfair on smaller local providers.

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

It could, but not necessarily.

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?

Well, there's the question already posed: would they be allowed to pass on differential charges, if any? This could result in some areas - from bits of Scotland to certain inner-city areas - finding it very expensive to get telephone service.

On the whole, I do not think such changes would be preferable - at least, wait until after the expected peak in demand

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

Well, you've already said it: there might be less need to investigate providers' internal processes. However, this need would still remain to some extent.

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

"an annual charge, paid on all blocks allocated, based on the costs of increasing capacity in that particular range (which could be zero)" - if you're going to introduce charges, then letting them be zero (or very low) just because there is no shortage in a particular area won't encourage efficiency there - which though it might not matter now, could in the future.

Question 54 *How would charging for number blocks affect consumers?*

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?*

No change

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

Premium, but also 0870, and even 0845 where revenue-share is implemented, services which keep the caller on hold (and also where they play a recording telling the caller how much the call costs).

Premium rate numbers advertised on television where the price is in vision only, but the number is given in sound as well (especially significant for blind "viewers").

Premium rate services where number and price are given with different font size/boldness.

Mis-selling (as "local" or "national") of 0845 and 0870 numbers, and similar.

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?*

All types of provider should be covered; obviously price differentials should be allowed between providers (e. g. so they can offer differentials, and also in the case of mobile providers recover their costs), but things like the new proposed 03 range, and the existing 0845 and 0870 ranges until they're abolished/updated, should truly cost as claimed (e. g. "local/national").

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?*

Very worthy; some will still slip through the net, but you've done all you can, I think.

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

I'm sure there are, though I can't think of them at the moment!

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?

Some consideration might be given to the possibility of splitting blocks in the case of abuse, so that companies who have not committed any offence can continue to supply a service, despite the fact that their supplier, or more likely another sub-customer of their supplier, has committed one, and possibly dissolved as a result/evasion measure.

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?

I can't forecast - criminals are cunning! Likewise, I can't at this point see what Ofcom can do through numbering policy to prevent as-yet unseen abuses