

Response From Windsor Telecom

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25th May 2006

Dear Andy

Windsor Telecom's response to 'Telephone Numbering: Safeguarding the future of numbers'

Windsor Telecom (WT) has considered the issues outlined in the consultation document 'Telephone Numbering: Safeguarding the future of numbers' and set out their opinions on 4 key issues below:

1. Charge communications providers a nominal sum for number allocations

WT are aware that a significant amount of number ranges have been issued to providers but a vast majority are not actually being utilised. The introduction of a nominal sum will hopefully ensure that ranges are put to good use and will force a lot of online providers, who currently offer NGN's free of charge, to re-evaluate their positioning in the marketplace.

Whilst WT would prefer no charge on number allocations, if a charge did come into place in 2007 it would need to be minimal to allow for healthy competition. For example, BT wouldn't miss a £1 per number but smaller telecoms companies would. The report mentions an 'annual charge'. An estimated figure would be useful to enable WT and other telecoms providers to plan their future pricing structures.

Another option for qualifying for number ranges could be based on a telecoms company's past track record and the use which they have made of current number allocations. This would avoid a charge being introduced altogether.

2. Introduction of new '03' number range

WT feel strongly opposed to the introduction of a new 03 number range. After initially reading through the report, a new 03 range appeared to be a sound idea due to the depleting ranges of 08x numbers and an alternative prefix to which we could apply our call plan solutions.

However, if the new 03 range is going to be charged at the same rate as geographic numbers why can't geographic number ranges be allocated so that intelligence (in the form of call plan solutions) can be attached and ensure that businesses can handle their inbound calls more effectively? For example, an additional number such as '0' following area codes (e.g. 01202 0*****). This would remove the need to introduce yet another NGN range and the costly/difficult task of educating consumers

on the new range. There is still a lot of confusion surrounding the current number ranges which are available. To introduce yet another NGN range to the marketplace will only add to this uncertainty!

WT believe that if Ofcom tightened up allocations and tariffs a new 03 range would not need to be introduced.

As there will be no revenue sharing allowed on the new 03 range, there **does not appear to be any incentive** at all for operators (apart from reserving blocks) to move across to the 03 range. Also if the cost of calling 0870 and 0845 numbers is bought into line with geographic call rates, what is the point in an 03 code?

Windsor Telecom firmly believes that the disadvantages of the new 03 range outweigh the advantages. Whilst the 03 range will provide businesses and public services with a 'national presence', the costs associated with informing consumers of their purpose will no doubt be an extremely difficult task. A considerable amount of investment will be required in order to generate a successful mass advertising campaign informing consumers of the 03 range. For example, a similar stance could be taken to the current advertising campaign for the switch over to digital TV, which explains why the change is happening in a simple yet effective way.

3. Simplify the structure of 08 and 09 number ranges

Whilst voluntary migration is expected to these simplified number ranges, WT are doubtful that this will happen due to the upheaval associated with switching number ranges. Forced migration may be necessary if the proposal does go ahead. WT understand that the new structure will make the cost of calling clearer for consumers but it is still a real concern for us and our customers.

Similar to the new 03 range, WT believe Ofcom will need to conduct another informative mass advertising campaign to inform consumers of yet more changes. It would be extremely useful if Ofcom could provide us with some copy which we can distribute to our client base/upload onto our website if the re-structure is put into place.

4. Increase consumer protection for 070 personal numbers allowing 07 to be wholly identified as a mobile range/ designate new 06 range for existing personal numbering services and future individual numbering allocations

The consultation also details that current 070 services will migrate to a new range (06) with 3 years. Once again education and migration issues prevail! Whilst the migration would be a manageable process for WT, concern arises for those providers who have a significant number of 070 services which would have to be migrated. A further informative advertising campaign would be needed to make consumers aware of 070 changes and the reason why the changes are taking place. On a positive note, this would present an opportunity for 07 holders to convert their 07 personal number into a mobile number. An 065 sub range to accommodate 070 personal numbering services is also a sound idea.

We hope that our opinions on a number of the issues raised in the consultation document will be taken into account a before a decision is reached on the future of numbers.

Yours sincerely,

Neil Sherring
Marketing Director
On behalf of Windsor Telecom plc