



Changes to making local calls in five area codes

Aberdeen (01224), Bradford (01274), Brighton
(01273), Middlesbrough (01642) and Milton Keynes
(01908)

Consultation

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Section 1

Summary

- 1.1 This consultation concerns proposals to introduce changes on 1 October 2014 to the way local calls are dialled in five areas of the UK in order to release more numbers as supplies are running low. The proposals affect the following areas and area codes: Aberdeen (01224), Bradford (01274), Brighton (01273), Middlesbrough (01642) and Milton Keynes (01908).
- 1.2 Ofcom administers the UK's telephone numbers and seeks to ensure that sufficient numbers are available to allocate to communications providers ('CPs') so that they can provide a choice of services to local residents and businesses.
- 1.3 Geographic telephone numbers¹ are an increasingly scarce resource. We allocate these numbers in large blocks to CPs. Although the quantity of geographic numbers that CPs already hold in total exceeds likely demand from end-users, individual CPs nevertheless need new allocations of geographic numbers from time to time. Our forecast of CPs' demand shows that, unless we take action, we risk running out of geographic numbers to allocate to CPs in some areas, including the five areas set out above. While this does not present a direct risk to the availability of numbers for consumers' use, a lack of number blocks for allocation to CPs could restrict the provision of services and deny local consumers the full benefits of competition. We therefore consulted in November 2010, September 2011 and March 2012 on measures designed to ensure the ongoing availability of geographic numbers across the UK.²
- 1.4 In September 2011 we decided that where an area with a four-digit area code (i.e. in the format 01XXX) needs more local numbers, we will increase supplies by stopping the ability to dial a local number without the area code when our existing supplies approach exhaustion in that area code. This means that, from the date we make this change, landline users in that area will need to dial the area code when making calls to phone numbers with the same area code (i.e. when making a 'local call'). This change in local dialling (known as 'closing local dialling') enables us to release new local numbers to CPs without requiring any changes to existing phone numbers. Dialling local calls with or without the area code does not affect the price of the call.
- 1.5 Closing local dialling allows us to make local numbers beginning with '0' and '1' available for use. For example, closing local dialling in the Aberdeen (01224) area code would make just over 200,000 new 01224 0XXXXX and 01224 1XXXXX numbers available for use, extending our supply of number blocks in Aberdeen for a further ten years. We cannot use such numbers while local calls are dialled without the area code because telephone networks can confuse them with dialling codes which start with '0', or with numbers for certain services which start with '1', such as 100 (operator assistance), 1471 (call return) and 118XXX (directory enquiries).
- 1.6 Following the September 2011 decision, the first area code in which our supplies of geographic numbers approached exhaustion was Bournemouth (01202). In May

¹ Geographic telephone numbers start with '01' or '02', and the following few digits associate the number with a particular UK location.

² *Geographic telephone numbers: Safeguarding the future of geographic numbers*: three documents published on 25 November 2010, 7 September 2011 and 20 March 2012. All are available at <http://stakeholders.ofcom.org.uk/consultations/geographic-telephone-numbers/>.

2012 we concluded, following consultation, that local dialling would be closed in that area code on 1 November 2012. We worked with an industry group to plan the implementation of the change, which was completed successfully with apparently minimal disruption to consumers.

- 1.7 We consider it will generally be appropriate to address number shortage in small batches of area codes at the same time and to consult on introducing the necessary measures to increase number supply periodically (e.g. every two to three years as required). A single date for local dialling changes across the area codes affected should enable a clear message to be communicated to consumers and would support cost-effective implementation by CPs and Ofcom.
- 1.8 We now forecast that we will exhaust our existing supplies of geographic telephone numbers in the Aberdeen (01224), Bradford (01274), Brighton (01273), Middlesbrough (01642) and Milton Keynes (01908) area codes in the period February 2015 to September 2016. Consistent with our September 2011 decision, and the approach followed in Bournemouth, we propose to close local dialling in these area codes to address the forecast shortages.
- 1.9 In this consultation we propose 1 October 2014 as the date on which local dialling in those area codes will be closed. We consider that 1 October 2014 is the most appropriate date for the change in local dialling in the affected area codes because:
 - it would release the new numbers for allocation ahead of the forecast for when we would run out of blocks to allocate to CPs in the first area (Brighton in February 2015) thus ensuring uninterrupted availability of supply of geographic numbers to CPs; and
 - it would allow us to provide stakeholders with approximately a year's notice of the change, which would help CPs and Ofcom to plan implementation with minimal disruption to consumers.
- 1.10 We are consulting on these proposals now so that we can consider stakeholders' views about the date and make a final decision early enough to give CPs sufficient notice to plan the implementation with us thereafter.
- 1.11 We are likely to need to close local dialling in additional area codes in the future. Our current forecasts show that exhaustion of our existing supplies of geographic numbers is likely to occur in other area codes after 2018, although our forecasts are subject to change as patterns of demand change over time. If our current forecasts continue to hold, further closure of local dialling is likely to be required in 2017 or 2018. We will consult on the proposed area codes and date of any such further closures of local dialling, with a view to deciding on the date with sufficient notice before implementation.
- 1.12 The deadline for responses to this consultation is 13 September 2013. Subject to consultation responses, we plan to publish our conclusions shortly thereafter, and to work with industry regarding communication plans and implementing the change.

Section 2

Introduction and background

2.1 Telephone numbers are a critical and, in some cases, scarce national resource. They are fundamental to the communications requirements of consumers and businesses. Ofcom manages the UK's telephone numbers under the Communications Act 2003 ('the Act'). We are responsible for ensuring that sufficient numbers are available to meet demand and for setting the policy on how numbers may be used. We allocate blocks of numbers to CPs so that they can use those numbers to deliver services to their customers. CPs must adopt and use numbers in accordance with the National Telephone Numbering Plan ('the Numbering Plan') and with General Condition 17 ('Allocation, Adoption and Use of Telephone Numbers') of the General Conditions of Entitlement.³

Scarcity of geographic numbers in some area codes

2.2 The number of CPs has increased significantly over the last ten years, leading to more competition and choice for consumers. This has led to an increasing demand for geographic telephone numbers – numbers which start with '01' and '02'. However, our stock of geographic telephone numbers available for allocation is limited. We forecast that, unless we take action, we will soon run out of available blocks of geographic telephone numbers in some area codes to allocate to CPs.

2.3 While this does not present a direct risk to the availability of numbers for consumers' use, exhaustion of blocks of geographic numbers to allocate to CPs could restrict the provision of services and deny local consumers the full benefits of competition. Furthermore, the European electronic communications framework states that, "*Member States shall ensure that adequate numbers and numbering ranges are provided for all publicly available electronic communications services*"⁴, and we are required to secure the availability throughout the UK of a wide range of electronic communications services.⁵ We must therefore be prepared to increase the supply of numbers in area codes that are close to exhaustion.

We previously decided how to address such scarcity

2.4 In September 2011, following consultation, we decided how we would make more geographic telephone numbers available in four-digit area codes (codes of the form 01XXX) for which we forecast running out of our existing supplies.⁶

2.5 We decided that the most appropriate solution to increase the supply of numbers in any area with a four-digit area code is to:

³ The National Telephone Numbering Plan is published at <http://stakeholders.ofcom.org.uk/binaries/telecoms/numbering/numbering-plan201212.pdf> and General Condition 17 is appended as an annex to that document.

⁴ Article 10(1) of the Framework Directive (Directive 2002/21/EC on a common regulatory framework for electronic communications networks and services) <http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:337:0037:01:EN:HTML>.

⁵ Under section 3(2)(b) of the Act.

⁶ *Geographic telephone numbers: Safeguarding the future of geographic numbers*, 7 September 2011 ('the September 2011 statement and consultation'), available at <http://stakeholders.ofcom.org.uk/consultations/geographic-telephone-numbers/>.

- close local dialling – this means that local fixed-line users would need to dial the area code when calling local numbers. Closing local dialling would allow us to allocate local numbers in which the first digit after the area code is either ‘0’ or ‘1’; and
 - if, in the future, further numbers are needed in that area, we would introduce an overlay code – which would mean that two area codes would serve the same geographic area.
- 2.6 Closing local dialling would make available for use local numbers beginning with the digits ‘0’ and ‘1’. For example, in the Aberdeen (01224) area code, this means numbers in the format 01224 0XXXXX and 01224 1XXXXX. Dialling the area code before the local number ensures that telephone networks do not confuse the new supply of local numbers with other number types and can determine how to route the call. Without the area code, networks may not be able to determine whether a caller dialling a six-digit number starting with ‘0’ is intending to call a local fixed-line number or, for example, a mobile number (e.g. 07XXXXX could either be a local number or the first digits of a mobile phone number). Similarly, if the area code is not dialled before a local number beginning with ‘1’, telephone networks could interpret the first few digits as either a local number or a call to an operator service such as ‘100’ or ‘150’, a network service such as ‘1471’ call return or a service number such as a ‘118XXX’ directory enquiry number.
- 2.7 This solution does not require changes to any existing phone numbers, either where local dialling is closed or where it may later prove necessary to introduce an overlay code. The price of a local call is not affected by either measure.
- 2.8 We decided to take this approach to address scarcity of geographic numbers in areas with four-digit codes as we considered it to be the option that limits the extent of disruption that could be caused by increasing the supply of numbers. In reaching this decision, we assessed this measure against other options: closing local dialling across the UK; implementing an overlay code immediately; and requiring a code and number change (e.g. shortening the area code to two or three digits and increasing the length of each local number).
- 2.9 We concluded that the best option for consumers, businesses and for competition between CPs would be to close local dialling in an area code when its supplies of numbers nears exhaustion and, if and when needed, introducing an overlay code. In summary, the key factors that led to our decision are:
- the combination of closing local dialling and the later introduction of an overlay code has the potential to increase the supply of geographic numbers well beyond the foreseeable future, and hence to make sure that the numbers that consumers and CPs want are available when they are needed;
 - closing local dialling would retain the current location significance of all geographic numbers, and, before any overlay code may be introduced, would preserve the current association between an area and a single area code. It could also aid understanding of any future introduction of overlay codes, where this proves necessary, because dialling the full area code for local calls would have become normal practice. This may help reduce confusion around dialling behaviour for numbers within the same geographic area with different area codes (i.e. the original code and the overlay), particularly the longer the interval between the two stages;

- in addition, closing local dialling would defer the need for an overlay code, which is potentially more disruptive because it could affect the location significance of numbers for consumers both within and outside the affected areas. Consumer research conducted in 2011 found that consumers consider that closing local dialling would have a lower negative impact on them than an overlay code or a number change.⁷ Closing local dialling would defer the need for an overlay code and may therefore benefit consumers; and
- although we noted the potential for a significant impact on older and vulnerable consumers as a result of our preferred option, we considered that no option for increasing the supply of geographic numbers offered a clear advantage to vulnerable groups. However, doing nothing is not a viable option for area codes where geographic numbers are forecast to run out. In addition, we considered that the impacts could be mitigated by effective and targeted communication.

We implemented this solution in the Bournemouth (01202) area code with minimal disruption to consumers

- 2.10 Accordingly, having forecast in 2012 that we would exhaust our supplies of geographic telephone numbers in the Bournemouth (01202) area code later that year, we decided on 31 May 2012, following consultation,⁸ to close local dialling in that area code on 1 November 2012. We set out our decision in a statement ('the May 2012 Statement').⁹
- 2.11 We formed a 'Closing local dialling industry group' ('the industry group')¹⁰ in November 2011 to consider implementation of closing local dialling. We worked closely with this group to deliver a local information campaign and a co-ordinated plan for the closing of local dialling in the Bournemouth (01202) area code. Implementation was completed successfully on 1 November 2012 and it appears to have caused minimal disruption to consumers. Prior to implementation, Ofcom commissioned a survey that indicated that 96 per cent of respondents were not concerned by the change.¹¹ After its implementation, Ofcom did not receive any substantial contact or concern from consumers directly, and CPs reported little to no contact to their customer help services regarding this change. In our view, the local information campaign was important to the successful implementation in Bournemouth, with the survey indicating that 81 per cent of local consumers were aware of the change before it occurred.¹²

⁷ Consumer research report prepared by Futuresight on geographic numbers *Geographic Numbering: Summary report of findings - June 2011*, which we published on 7 September 2011 ('the 2011 consumer research') <http://stakeholders.ofcom.org.uk/consultations/safeguarding-geographic-numbers/>.

⁸ *Geographic telephone numbers: Safeguarding the future of geographic numbers*, Ofcom consultation document published 20 March 2012, available at <http://stakeholders.ofcom.org.uk/binaries/consultations/geo-numbers/summary/condoc.pdf> ('the March 2012 Consultation').

⁹ See *Changes to making local calls in the 01202 area code for Bournemouth, Christchurch and Poole*, Ofcom statement published 31 May 2012, available at <http://stakeholders.ofcom.org.uk/binaries/consultations/geo-numbers/statement/statement.pdf>.

¹⁰ The industry group consists of representatives from around 10 CPs with the most geographic number allocations and fixed line customers and the largest market shares of fixed line call origination.

¹¹ Ofcom press release 1 November 2012, *Dial the code in Bournemouth, Christchurch and Poole* (<http://media.ofcom.org.uk/2012/11/01/dial-the-code-in-bournemouth-christchurch-and-poole/>).

¹² *Ibid.*

We forecast that we will soon run out of supplies of numbers in five area codes

- 2.12 We now forecast that we will exhaust our existing supplies of geographic telephone numbers in the Aberdeen (01224), Bradford (01274), Brighton (01273), Middlesbrough (01642) and Milton Keynes (01908) area codes (referred to in this document as ‘the Five Area Codes’) in the period February 2015 to September 2016. This forecast for area codes requiring more numbers is very closely aligned to the indication given to stakeholders in the May 2012 Statement, in which we forecast that a further six area codes would run out of numbers before the end of 2016.¹³ Following the approach taken successfully in Bournemouth, we propose to close local dialling in these areas to address the forecast shortage. We discuss these proposals in Section 3.

We have also introduced a pilot scheme to charge CPs for numbers allocated to them in certain area codes

- 2.13 Our approach to ensuring an adequate supply of geographic numbers also includes considering ways to promote the efficient use of existing numbers. In July 2012 we published a statement confirming the introduction in April 2013 of number charging in a pilot scheme.¹⁴ We expect that charging CPs for their allocated numbers will improve incentives to use numbers efficiently.
- 2.14 The pilot scheme was introduced on 1 April 2013, with the first charging year ending on 31 March 2014. This scheme covers 30 area codes with the fewest number blocks remaining available for allocation around the time of our statement (i.e. as at 29 June 2012),¹⁵ and includes the Five Area Codes.
- 2.15 The introduction of the pilot scheme has resulted in some CPs reassessing their numbering requirements and returning number blocks to Ofcom. This has reduced the number of area codes that need to be considered at this time for closing of local dialling to address number shortage. CPs’ assessment of numbering requirements will be ongoing and we may receive further number block returns during the charging year. However, to date, we have not received any indication that CPs are likely to return sufficient blocks in any of the area codes subject to this consultation to ensure an adequate supply to meet CPs’ likely demand for numbers for the next few years

Impact assessment

- 2.16 Impact Assessments form a key part of the policy-making process and provide a transparent way of considering different options for regulation, including not regulating. We expect to carry out Impact Assessments for the great majority of our

¹³ Paragraphs 1.10 and 1.11 of the May 2012 Statement. Stoke-on-Trent (01782) was the sixth area code forecast for number shortage in May 2012. However, this area code now has sufficient numbers (102 blocks) and availability is forecast to last until May 2019 due to a recent substantial block return.

¹⁴ *Promoting efficient use of geographic telephone numbers*, Ofcom statement published on 18 July 2012 (<http://stakeholders.ofcom.org.uk/binaries/consultations/geo-numbers/statement/numbers-statement.pdf>).

¹⁵ *Ibid*, see page 59.

policy decisions. The analysis presented throughout this document represents an impact assessment as defined in section 7 of the Act.¹⁶

Equality impact assessment

2.17 We must also assess the effect of functions, policies, projects and practices on equality in accordance with the Equality Act 2010. Equality impact assessments also assist us in making sure that we are meeting our principal duty of furthering the interests of citizens and consumers. We have therefore also considered what (if any) impact the issues under consideration in this document may have on equality. Where relevant, we have highlighted our consideration of equality issues in the document.

Structure of this document

2.18 The next section of this document sets out our proposals, the matters we have considered in relation to them and how we consider that our proposals meet the relevant legal tests. Section 4 sets out the next steps. Annex 3 sets out the legal framework and Annex 4 sets out the change we propose to the Numbering Plan that would put our proposals into effect.

¹⁶ See our guidelines at http://stakeholders.intra.ofcom.local/binaries/consultations/better-policy-making/Better_Policy_Making.pdf.

Section 3

Proposals and relevant considerations

- 3.1 As set out in Section 2, we concluded in the September 2011 statement and consultation that we will close local dialling in four-digit area codes where we forecast that we will run out of available numbers. We implemented this policy in the Bournemouth 01202 area code on 1 November 2012, which was the first area code to require this measure.

Why we are proposing to close local dialling in the Five Area Codes

- 3.2 We worked with the industry group, which we set up to assist us in implementing closing local dialling, to determine an appropriate threshold for when we need to consider taking action to increase the supply of numbers in an area code and consult on a date for closing local dialling. Any such threshold would need to take into account number block availability, forecasts for running out of numbers and the time required to implement the changes and adequately inform consumers. Our principles were to establish a threshold that was transparent and that would identify any area codes forecast to experience shortage over the next two to three years.
- 3.3 Current analysis of different scenarios using block availability and forecasting has shown that closing local dialling in areas with fewer than 70 blocks of 1,000 numbers remaining available for allocation (at the time of going to consultation on the change) is likely to prevent acute shortage within the next few years, given that 70 blocks provides sufficient numbers for four to five more years on average. This threshold has the approval of the industry group. Nevertheless, availability of 70 blocks will not necessarily be the appropriate threshold in the future as this measure will need to be tested against forecasts and allocation rates to determine whether it would afford sufficient block availability.
- 3.4 There are currently five area codes with 70 or fewer blocks of 1,000 numbers remaining available for allocation (i.e. the Five Area Codes). Our forecast indicates that we will run out of number blocks to allocate to CPs in each of these area codes during the period February 2015 to September 2016. Figure 3.1 sets out the number of blocks available as at 8 July 2013 and the forecast of when they will run out in each of the Five Area Codes.

Figure 3.1 The Five Area Codes – forecast and current block availability

Area Name	Area Code	Number of 1,000-number blocks available (as at 8 July 2013)	Forecast of when available blocks will run out
Aberdeen	01224	50	October 2015
Bradford	01274	38	September 2015
Brighton	01273	33	February 2015
Middlesbrough	01642	42	September 2016
Milton Keynes	01908	53	May 2016

- 3.5 As there are fewer than 70 number blocks available for allocation in the Five Area Codes and these blocks are forecast to run out within the next three years, we consider it an appropriate time to plan for increasing the supply of numbers and to consult on a date for closing local dialling in those area codes.
- 3.6 All other area codes currently have over 70 blocks available for allocation and are forecast to have sufficient numbers available to meet CPs' requirements until at least 2018. We do not consider measures to increase the supply of numbers in any area codes other than the Five Area Codes proposed are required at this time.
- 3.7 Closing local dialling would make available for use local numbers beginning with the digits '0' and '1' (i.e. numbers in the format 01224 0XXXXX and 01224 1XXXXX, for example). Figure 3.2 below sets out the quantity of numbers which the proposed change would make available for allocation in each of the Five Area Codes and our forecast for how many years of additional number supply these would provide. These forecasts may be subject to change for a number of reasons, including the possible effect of policy changes such as charging for numbers and any potential changes to our administrative processes for allocating geographic numbers.¹⁷ Further demand for numbers in the Five Area Codes would be met through the introduction of an overlay code.

Figure 3.2 The Five Area Codes – forecast and increase in number block availability following closing of local dialling

Area Name	Area Code	Additional 1,000-number blocks made available	Forecast of when available blocks would run out
Aberdeen	01224	207	2025
Bradford	01274	190	2028
Brighton	01273	206	2026
Middlesbrough	01642	169	2028
Milton Keynes	01908	164	2025

Why we are proposing 1 October 2014 as the date on which local dialling will be closed in the Five Area Codes

- 3.8 We have worked with the industry group to identify an appropriate date on which to close local dialling in the Five Area Codes in order to meet the need for more numbers.
- 3.9 The implications of planning for the change in five area codes on the same day, as opposed to a single area as at the time of the Bournemouth change, have been a particular consideration. Ofcom and the industry group agreed that it would be advantageous to implement the changes on a single date to ensure a consistent communications message. Focussing the five local communications campaigns on one date should also prove a more cost-effective approach than a staggered implementation. It was recognised that communicating and implementing the change

¹⁷ We are currently reviewing our administrative processes for allocating geographic numbers and plan to consult on our proposals later this year. For more information, see paragraphs 5.97 to 5.201 of the September 2011 statement and consultation.

in five areas simultaneously may have resource implications. However, the industry group concluded that this would be manageable for this quantity of area codes on the understanding that approximately one year's notice of the change would be provided.

3.10 In deciding on an appropriate timeframe for the change, we have taken the following points into account:

- the need to act in sufficient time to avoid number shortage in the Five Area Codes, which would restrict CPs' ability to compete for new customers in these areas;
- the time required by CPs to plan for and implement the change in their networks;
- reasonable timescales for communicating the change in dialling behaviour to consumers in the Five Area Codes;
- additional considerations relating to communicating the change in dialling behaviour to older and vulnerable consumers, such as using a wide variety of communication channels to communicate the change and ensuring sufficient time for those who care for or come into contact with older or vulnerable consumers to help them prepare for the change to local dialling; and
- the need to avoid certain timeframes due to:
 - local or national events that may dilute consumer awareness communications;
 - any freezes on amendments to telephone networks set by CPs to avoid overloading (e.g. over the Christmas period); and
 - unsuitable times of year to introduce changes to the way people use their fixed-line telephone due to, for example, a higher level of calls being made (e.g. over the Christmas period) or when a higher percentage of people may be away from home or temporarily visiting an area, such as the summer period.

3.11 In identifying our proposed date, we have taken into account the following views expressed by CPs during the consultation on closing local dialling in Bournemouth on the day of the week and/or time of day that local dialling should be closed:

- CPs should close local dialling on a single calendar day to avoid consumer confusion arising from an inconsistent approach and to aid communication;
- closing local dialling on a weekday may make it easier for CPs to react to any unforeseen impact from closing local dialling as more engineers, customer-facing employees and any other support staff required would be available to respond; and
- there should be a specified time during which CPs can make the change to their network to close local dialling and install a mis-dial message that consumers will hear if they dial a local number without the area code. That time period should allow for CPs that prefer to make the change during or outside of office hours.

- 3.12 Taking into account all the factors above, we propose that Wednesday 1 October 2014 would be an appropriate date on which to close local dialling in the Five Area Codes because:
- it would release new numbers for allocation ahead of the forecast for when we will run out of blocks to allocate to CPs in the first of the Five Area Codes (Brighton in February 2015);
 - it would allow us to provide stakeholders with approximately a year's notice of the change, which would help CPs and Ofcom to plan implementation with minimal disruption to consumers;
 - to the best of our knowledge, this is not an unsuitable time of year to make a change to local dialling and there are no local or national events occurring on or around that date that are likely to dilute the communications message. We are seeking further information through this consultation to confirm our understanding;
 - it is a working day, which would facilitate CPs' implementation; and
 - being the first day of a month, it would be memorable and so assist in the formulation of a clear communications campaign.
- 3.13 We propose that the change should be implemented between the hours of 00:01 and 12:00.

Implementing the closing of local dialling in the Five Area Codes

- 3.14 We have worked with the industry group to determine the processes for closing local dialling, building on the experience of the Bournemouth change. There are two main areas for consideration – the technical implementation in networks and communication of the change in dialling behaviour to consumers.

CP implementation

- 3.15 For the Bournemouth change, we worked with the industry group to set out the detailed implementation process for closing local dialling in a framework document that was used as a reference and 'best practice' guide for CPs. If we proceed with our proposals for the Five Area Codes, we will aim to produce a similar framework document with the industry group.
- 3.16 The framework document will provide CPs with the technical details required for closing local dialling and the process for ensuring a coordinated consumer communications campaign. Among other things, the document will include recommended wording for mis-dial announcements, plus the logo and agreed text to be used in consumer communications to ensure consistent messages are provided by the different CPs.

Communications campaign

- 3.17 Closing local dialling requires a change to consumers' dialling behaviour from fixed-line telephones, in that the whole telephone number must be dialled for every call, including to another number with the same area code. Therefore consumers need to be made aware that a change is forthcoming and what they need to do to adapt to that change.

- 3.18 As well as changing dialling behaviour, residential and business consumers may need to make other changes. For instance, auto-dial numbers stored on telephones in the local format would need to be reprogrammed. Also, if local numbers in the Five Area Codes are published or otherwise advertised without the area code, then consideration will need to be given by the end user to changing the format to include the area code to prevent confusion, misdials and lost calls.
- 3.19 Ofcom intends to coordinate a public communications campaign to alert the wider community covered by the Five Area Codes of the change to dialling behaviour required. We will define the necessary characteristics of an effective communications campaign and ensure that this is coordinated and delivered in an appropriate and consistent manner to local citizens, taking into account the particular needs of older and vulnerable consumers.
- 3.20 CPs will be responsible for funding and directly communicating the changes to their own customers.

Proposed modification to the Numbering Plan to close local dialling in the Five Area Codes

- 3.21 The Numbering Plan contains the following obligations relating to local dialling in 'Part B3: Specific Restrictions on Telephone Numbers':

"B3.1.2 Geographic Numbers shall not be Adopted or otherwise used other than where Calling Parties with Geographic Numbers with the same Geographic Area Code as the Called Party are able to dial using only the Local Number except where:

- a. those numbers are National-Dialling-Only Numbers – see B3.1.5 below; or
- b. Calling Parties are dialling from Geographic Numbers with a Geographic Area Code in respect of which Local Dialling has been closed – see B3.1.3 below.

B3.1.3 Local Dialling shall not be provided from Geographic Numbers with a Geographic Area Code listed in the table below, with effect from the date specified.

Geographic Area Code	Effective Date
01202	1 November 2012

- 3.22 The table in Part B3.1.3 currently lists the 01202 area code, with an effective date of 1 November 2012. We propose to add the 01224, 01273, 01274, 01642 and 01908 area codes to the table, each with an effective date of 1 October 2014. The effect of the proposed modification would be to:

- remove the Five Area Codes from the obligation on CPs to provide the local dialling facility to callers in geographic area codes;
- prevent local dialling from being provided from geographic numbers with the Five Area Codes; and

- bring the above modifications into effect from 1 October 2014.

3.23 We set out the proposed modification to the Numbering Plan in Annex 4. We invite stakeholders to comment¹⁸ on the proposed modification.

Duties and legal tests

3.24 In order to implement the closing of local dialling in the Five Area Codes, we need to consult on modifications to the Numbering Plan¹⁹ as set out in paragraphs 3.28 to 3.30 and in Annex 4.

3.25 We looked at how the decision to close local dialling in an area code would likely meet Ofcom's duties and relevant legal tests in the Act in the September 2011 statement and consultation.²⁰ We now consider our proposals for closing local dialling in the Five Area Codes from 1 October 2014 to increase the supply of numbers available with respect to Ofcom's duties and the relevant legal tests in the Act.

3.26 We consider that our proposals are consistent with our general duties in carrying out our functions as set out in section 3 of the Act.²¹ In particular, we consider that the proposals would further the interests of citizens in relation to communications matters and consumers in relevant markets by ensuring that sufficient geographic numbers remain available for allocation to CPs in the Five Area Codes, thus facilitating CPs in their provision of communications services to consumers and citizens, and promoting competition and choice for consumers in the areas covered by the Five Area Codes.

3.27 In reaching our proposals, we have also taken into account the Community obligations set out in section 4 of the Act, particularly the first requirement to promote competition in the provision of electronic communications networks, services and associated facilities through the ongoing availability of geographic numbers in all areas of the UK and by addressing forecast scarcity.

3.28 We are proposing modifications to the Numbering Plan in order to implement this measure from the proposed date of 1 October 2014. Section 60(2) of the Act provides for the modification of documents referred to in the Numbering Conditions (which includes the Numbering Plan). Under section 60(2) we may only modify the Numbering Plan if we are satisfied that the revision is:

- objectively justifiable in relation to the matter to which it relates;
- not such as to discriminate unduly against particular persons or against a particular description of persons;
- proportionate to what the modification is intended to achieve; and
- in relation to what is intended to achieve, transparent.

3.29 We consider that the proposals to close local dialling in the Five Area Codes on 1 October 2014 to increase the supply of local numbers would meet these tests in the following manner:

¹⁸ See Question 3 at the end of Section 3.

¹⁹ Annex 3 sets out the procedure in the Act for consulting on modifications to the Numbering Plan.

²⁰ See Section 4 paragraphs 4.226 to 4.230 of the September 2011 statement and consultation.

²¹ See Annex 3 for further information on our duties and the legal tests.

- **objectively justifiable**, in that the European electronic communications framework states that “*Member States shall ensure that adequate numbers and numbering ranges are provided for all publicly available electronic communications services*”²² and Ofcom is specifically required to secure the availability throughout the UK of a wide range of electronic communications services under section 3(2)(b) of the Act.

Without taking measures to increase the supply of number blocks for allocation to CPs in the Five Area Codes we are at risk of running out of numbers to serve the areas covered by the Five Area Codes. This may have the effect of constraining competition and consumer choice in service provision. Our approach to increasing the supply of geographic numbers provides a long-term plan for ensuring the ongoing availability of numbers in all areas in a manner that recognises local requirements and causes the least disruption for consumers.

- **not unduly discriminatory**, in that our analysis of the appropriate date for closing local dialling in order to increase the supply of geographic numbers recognises the different impacts on consumers, businesses and CPs. We canvassed the issues with CPs within the industry group to assist in establishing an appropriate date for consultation and a feasible timescale for implementation. We consider that the proposed date of 1 October 2014 to close local dialling in the Five Area Codes would not unduly discriminate against any particular groups of stakeholders and we are seeking views through this consultation to confirm this position.

Our approach in implementing number supply measures only in area codes that require more numbers (i.e. the Five Area Codes only at this time) would result in changes in some areas of the UK only (and thereby affecting some consumers and businesses and not others). This is not considered to be unduly discriminatory as it is a response to the different situations regarding number availability that prevail in those areas and is intended to minimise disruption to UK consumers as a whole.

Closing local dialling requires a change in dialling behaviour and this would be applicable to all who dial numbers locally in an area where the local dialling facility was removed. This may affect consumers differently and the level of impact of removing the local dialling facility may vary across consumer groups. Consumer research conducted in 2010 found that half of consumers aged 55 or over valued local dialling as opposed to just over 30 per cent aged between 25 to 44 years.²³

Closing local dialling may also have a greater impact on older and vulnerable consumers. These consumers may be less exposed to communications campaigns and may find the required change in dialling behaviour confusing.

However, any measure to increase the supplies of geographic numbers would likely have a greater impact on older and vulnerable consumers and there are actions that can be taken to mitigate the risks identified, particularly involving the way that closing local dialling is communicated to consumers and to specific

²² Article 10(1) of the Framework Directive.

²³ 2010 consumer research report prepared by Futuresight on geographic numbers *Geographic numbering and local dialling*, published November 2010 (‘the 2010 consumer research’) <http://stakeholders.ofcom.org.uk/binaries/consultations/geographic-numbers/annexes/numbering-futuresight.pdf>. See page 10.

groups of consumers. Ofcom would coordinate the communications campaign and would take this into account.

- **proportionate**, in that it is the general objective of our management of geographic telephone numbers to ensure that geographic numbers are available to support competition in fixed-line voice services across the UK for the foreseeable future. The policy principles²⁴ that guide how we meet this objective are that:
 - the numbers consumers want are available when they are needed;
 - the numbers consumers currently use are not changed if this is avoidable;
 - the meaning which numbers provide to consumers is protected;
 - number allocation processes support competition and innovation; and
 - consumers are not avoidably exposed to abuse.

The proposed modifications to the Numbering Plan in relation to closing local dialling in the Five Area Codes from 1 October 2014 are needed to implement our decision on how to increase the supply of geographic numbers in four-digit area codes forecast to run out. These modifications would enable the meeting of our objective to ensure that geographic numbers are available in areas when needed and would be in line with our stated policy principles and approach on number supply measures as set out in the September 2011 statement and consultation and reflected in Section 2 of this document.

We have consulted CPs on the potential costs and timescales involved in closing local dialling in an area code.²⁵ Responses suggested that while these are likely to be determined by the size and type of network employed by the CP and therefore may vary considerably, the costs and timing of implementing closing local dialling were not thought to prohibit closing local dialling as the most appropriate and proportionate option for increasing the supply of numbers in area codes forecast to run out. Further work with CPs on implementing closing local dialling in the 01202 area code have not suggested otherwise. We have also consulted with the industry group on the impact of closing local dialling in the Five Area Codes on the same day. CPs consider this approach to be the most cost-effective provided that approximately one year's notice of the change is provided.

- **transparent**, in that our reasoning for our decision on how to increase the supply of geographic numbers in areas with four-digit codes through closing local dialling, and thereby support competition in fixed-line services across the UK for the foreseeable future, is set out in the September 2011 statement and consultation.

In this document we have explained that our forecast predicts that we will run out of blocks of geographic numbers to allocate to CPs in the Five Area Codes during the period February 2015 to September 2016. We therefore need to make

²⁴ The policy principles that guide our strategic decisions on how telephone numbers are managed are set out in more detail in paragraphs 2.23 and 2.24 of the March 2012 Consultation.

²⁵ See questions 11 and 12 in *Geographic telephone numbers: Safeguarding the future of geographic numbers*, Ofcom consultation document published 25 November 2010 (<http://stakeholders.ofcom.org.uk/consultations/geographic-numbers/>) and the summary of responses to those questions in the September 2011 statement and consultation in paragraphs 4.186 to 4.193 and paragraphs 4.208 to 4.221.

additional number blocks available in accordance with our decision on how to increase the supply of numbers in four-digit area codes.

3.30 In addition, we consider that our proposals to modify the Numbering Plan to close local dialling in the Five Area Codes on 1 October 2014 in order to increase the supply of numbers fulfils our general duty as to telephone number functions as set out in section 63 of the Act by:

- **securing the best use of appropriate numbers**, in that the proposals to close local dialling in the Five Area Codes from 1 October 2014 would make between 164,000 and 207,000 additional numbers available for use in each of the Five Area Codes. These numbers are already in existence but are not available for general use while local dialling is permitted. This measure would make best use of currently unusable numbers by making them available to fulfil demand; and
- **encouraging efficiency and innovation**, in that our proposals would make available more numbers in the Five Area Codes in response to our forecast that we would run out of number blocks to allocate to CPs over the next two to three years. The additional supply of numbers in the Five Area Codes would ensure that a lack of numbers does not constrain CP activity or provide a barrier to innovation.

Question 1: Do you agree with our proposals that local dialling should be closed in the Five Area Codes - Aberdeen (01224), Bradford (01274), Brighton (01273), Middlesbrough (01642) and Milton Keynes (01908) - on 1 October 2014?

Question 2: Are you aware of any local or national events that may dilute consumer awareness communications/any other factors suggesting that 1 October 2014 is an unsuitable date/time of year to introduce the proposed changes to local dialling?

Question 3: Do you have any comments on the proposed modifications to the Numbering Plan set out at Annex 4 and/or on our view as to how the proposed modification meets the relevant legal tests in section 60(2) of the Act?

Section 4

Next steps

- 4.1 The deadline for responses to this consultation is 13 September 2013. Subject to consultation responses, we plan to issue a concluding statement soon thereafter, in time to allow approximately a year's planning ahead of implementation.
- 4.2 If we decide to go ahead with the proposals we will work with industry to plan local information campaigns and the overall implementation.
- 4.3 We are likely to need to close local dialling in additional area codes in the future. Our current forecasts (see Annex 2) show that exhaustion of our existing supplies of geographic numbers is likely to occur in additional area codes in 2019 and later, although our forecasts are subject to change as patterns of demand change over time. If our current forecasts continue to hold, further closure of local dialling is likely to be required in 2017 or 2018. We will consult on the proposed area codes and date of any such further closures of local dialling, with a view to deciding on the date with sufficient notice.

Annex 1

Area code maps

A1.1 Figures A1.1 to A1.5 below show the five area codes subject to this consultation and their surrounding area codes. The surrounding area codes would be unaffected by the change to local dialling.

Figure A1.1 The 01224 Aberdeen area code and surrounding area codes

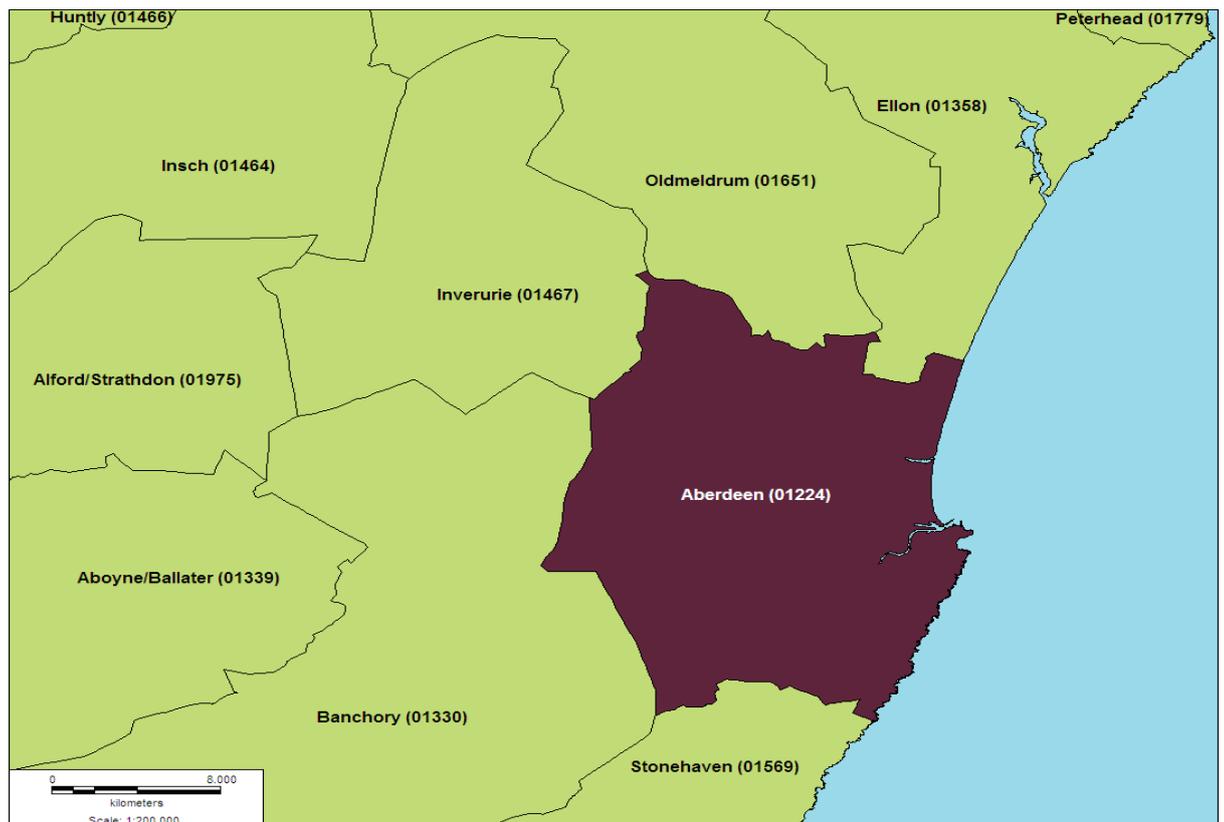


Figure A1.2 The 01274 Bradford area code and surrounding area codes

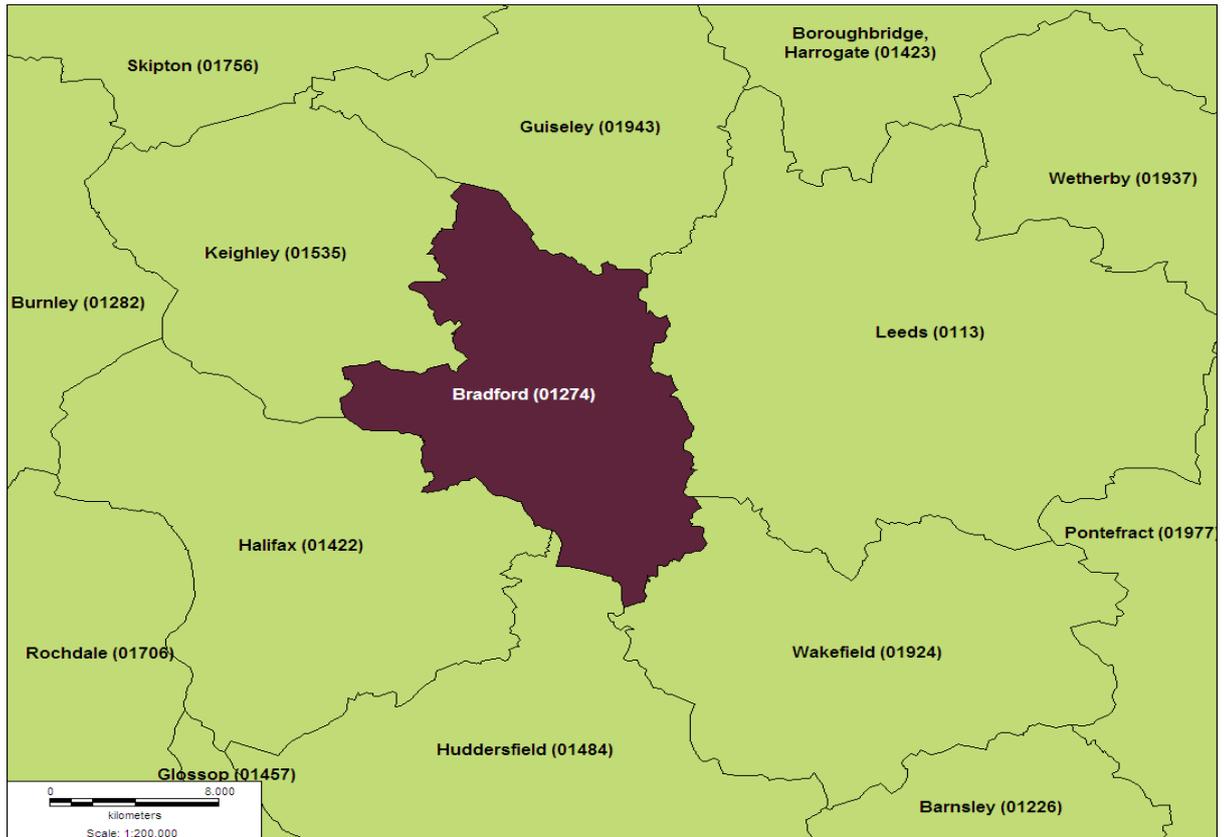


Figure A1.3 The 01273 Brighton area code and surrounding area codes

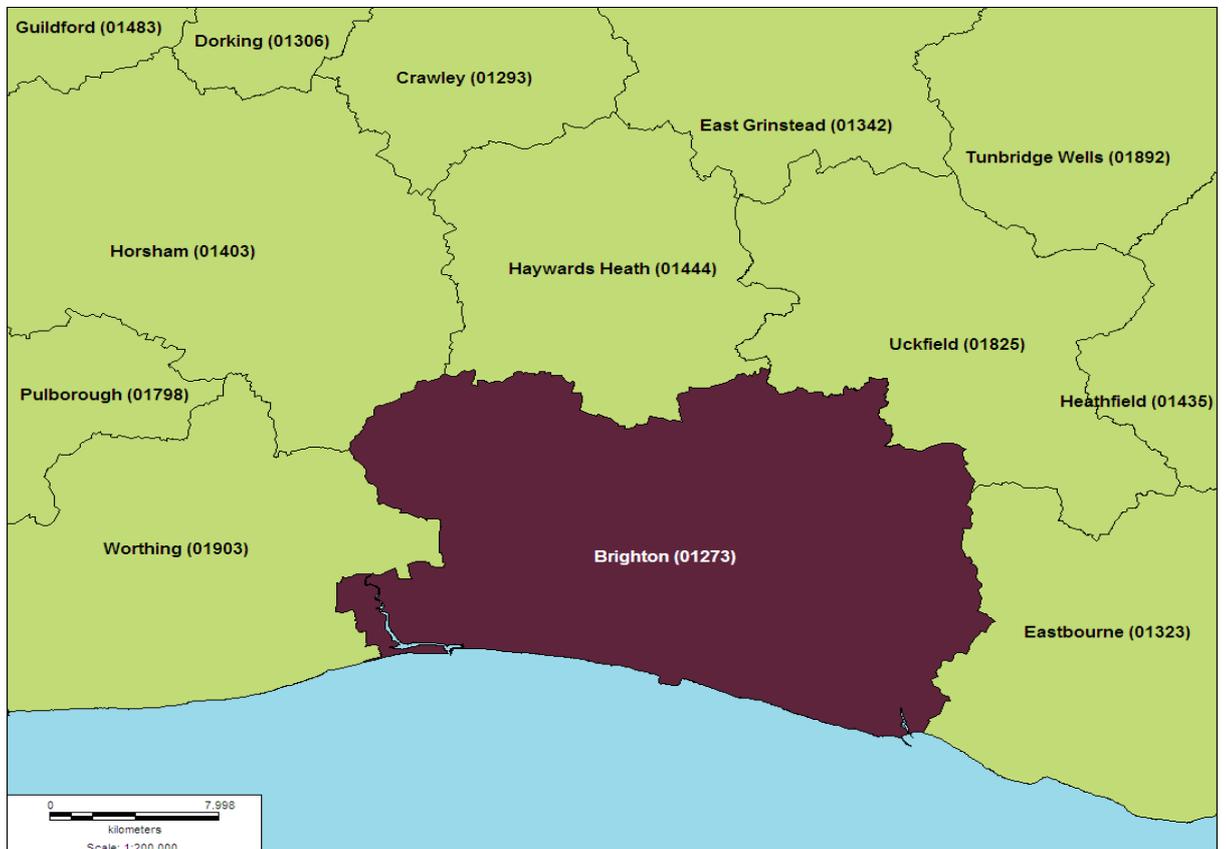


Figure A1.4 The 01642 Middlesbrough area code and surrounding area codes

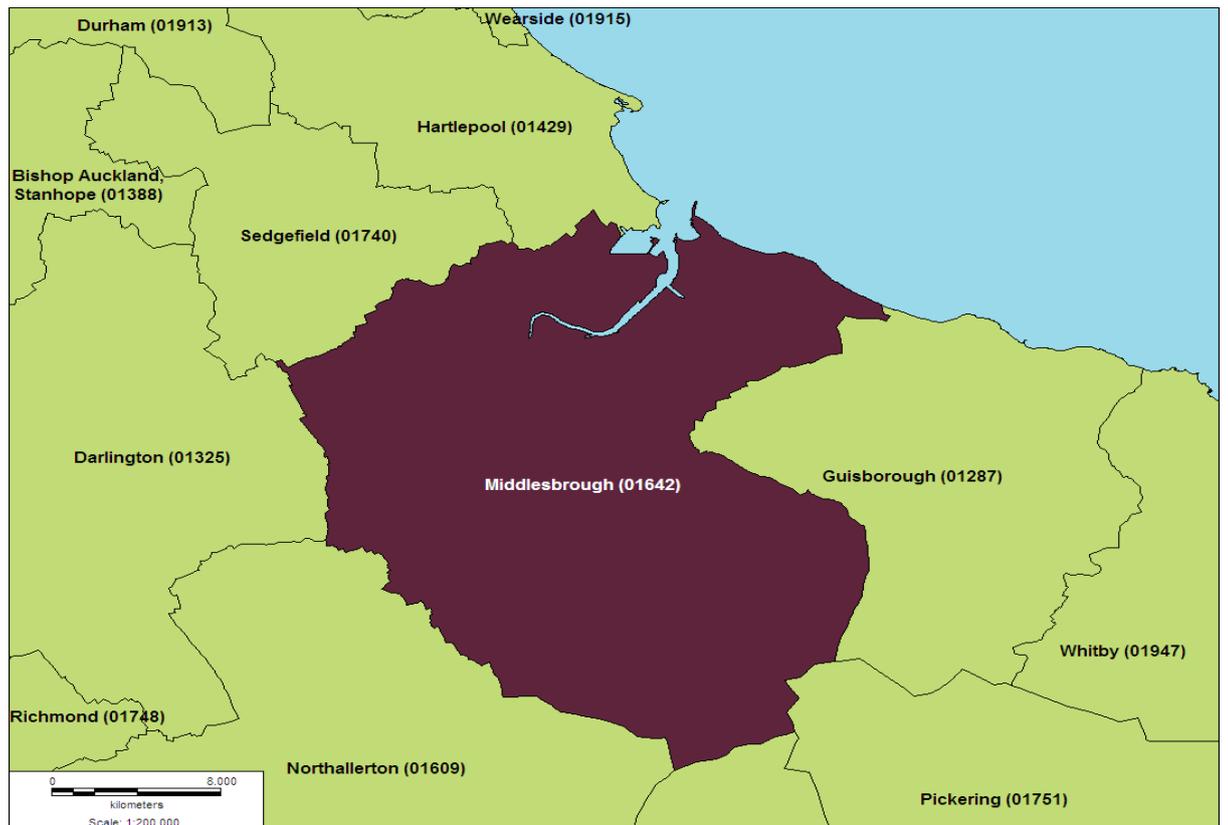
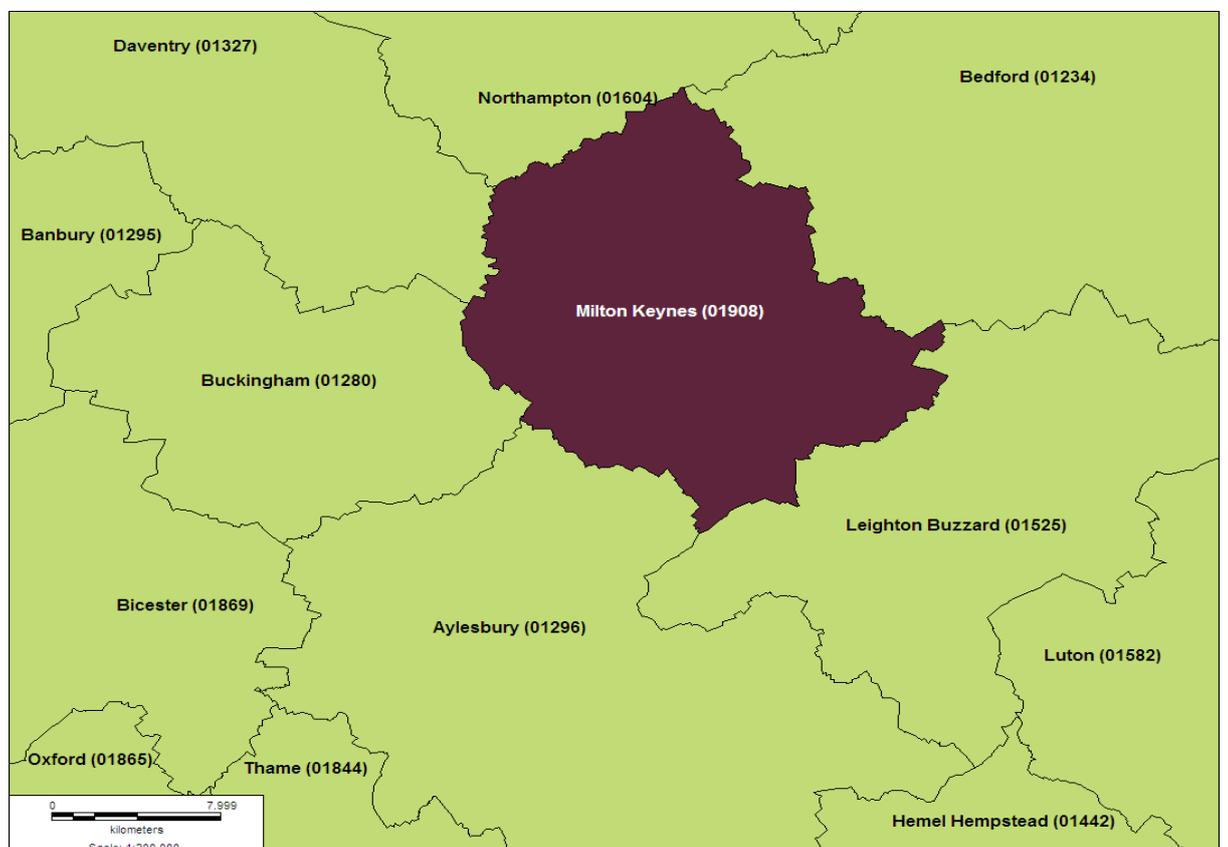
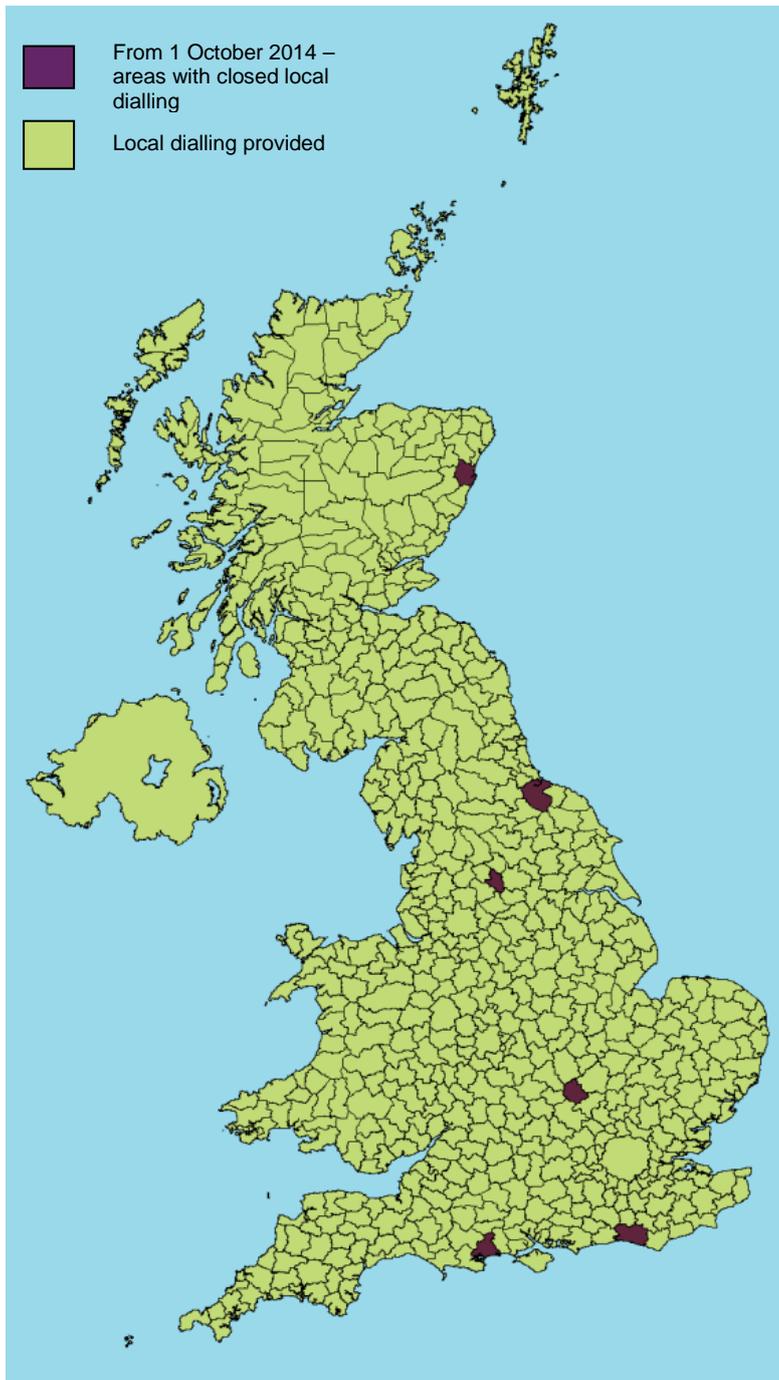


Figure A1.5 The 01908 Milton Keynes area code and surrounding area codes



A1.2 Figure A1.6 below shows the UK area code map highlighting the spread of the six area codes where local dialling without an area code would be closed from 1 October 2014 under our proposals. This includes the 01202 Bournemouth area code where local dialling was closed on 1 November 2012.

Figure A1.6 Proposed area codes with closed local dialling from 1 October 2014

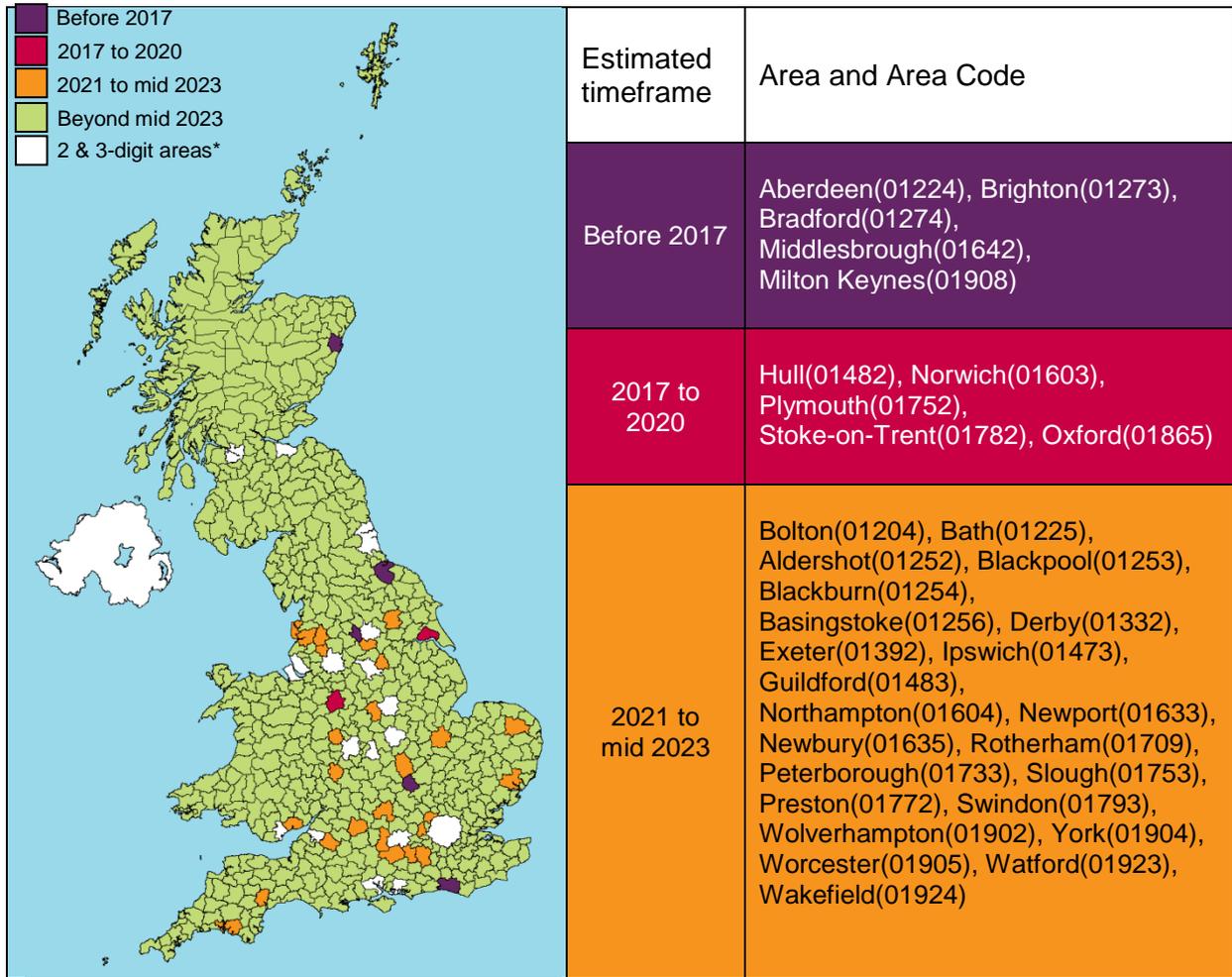


Annex 2

Forecast of number block availability

- A2.1 The forecast in Figure A2.1 below is a 'snapshot' of when we predict that we will run out of our supply of number blocks to allocate to CPs using relevant data as at 8 July 2013. The forecast for each area code will vary over time (for instance each time a block of numbers is allocated or withdrawn in an area code there may be an effect on the forecast).
- A2.2 The forecast is based on historical allocation trends and is necessarily subject to uncertainties. It does not attempt to quantify the potential effect of the introduction of charging for numbers in a pilot scheme in some area codes (see paragraphs 2.13 to 2.15) or any other potential changes to our administrative processes for allocating geographic numbers.
- A2.3 In addition, the forecast will be affected by future events and influenced by many variables, including local developments, consumer demand, business decisions by individual CPs and the emergence of new applications and technologies.
- A2.4 The specific area codes and timeframe in which number supply measures prove to be necessary over the next ten years may therefore differ significantly from our forecast in Figure A2.1.

Figure A2.1 Areas forecast to run out of their current supply of numbers within the next ten years



*Areas with '0' plus two-digit area codes (such as London '020' and Cardiff '029') and areas with '0' plus three-digit area codes (such as Glasgow '0141' and Nottingham '0115') are not likely to run out of numbers.

Annex 3

Legal framework

A3.1 Ofcom regulates the communications sector under the framework established by the Communication Act 2003 (the 'Act'), which implements the suite of EU Directives known as the EU Common Regulatory Framework. The Act provides, among other things in relation to numbering, for the publication of the National Telephone Numbering Plan (the 'Numbering Plan') and the setting of General Conditions of Entitlement relating to Telephone Numbers ('Numbering Conditions', or 'GC17'). It also sets out statutory procedures governing the modification of the Numbering Plan and any General Conditions.

Ofcom's general duty as to telephone numbering functions

A3.2 Ofcom has a general duty under section 63(1) of the Act in carrying out its numbering functions:

“a) to secure that what appears to them to be the best use is made of the numbers that are appropriate to use as telephone numbers; and

b) to encourage efficiency and innovation for that purpose.”

Principal duties of Ofcom

A3.3 The principal duty of Ofcom to be observed in the carrying out of its functions is set out in section 3(1) of the Act as the duty:

“a) to further the interests of citizens in relation to communications matters; and

b) to further the interests of consumers in relevant markets, where appropriate by promoting competition.”

Duties for the purpose of fulfilling Community obligations

A3.4 In addition to our general duties and our duty regarding telephone numbers, Ofcom must also take into account the six Community requirements in carrying out its functions as set out in section 4 of the Act. These include the requirement to promote competition in the provision of electronic communications networks and services, as well as the requirement to promote the interests of European citizens.

The Numbering Plan

A3.5 Section 56(1) of the Act states that:

“It shall be the duty of OFCOM to publish a document (to be known as “the National Telephone Numbering Plan”) setting out-

a) the numbers that they have determined to be available for allocation by them as telephone numbers;

b) such restrictions as they consider appropriate on the adoption of numbers available for allocation in accordance with the plan;

- ba) such requirements as they consider appropriate, for the purpose of protecting consumers, in relation to the tariff principles and maximum prices applicable to numbers so adopted or available for allocation; and
- c) such restrictions as they consider appropriate on the other uses to which numbers available for allocation in accordance with the plan may be put.”

A3.6 The Act provides for Ofcom to review and revise the Numbering Plan. Section 56(2) states that:

“It shall be OFCOM’s duty -

- a) from time to time to review the National Telephone Numbering Plan; and
- b) to make any modification to that plan that they think fit in consequence of such a review;

but this duty must be performed in compliance with the requirements, so far as applicable, of section 60.”

A3.7 Section 60 of the Act provides for the modification of documents referred to in the Numbering Conditions (which includes the Numbering Plan) and explains the procedures to be followed in order to conduct this review. Section 60(2) of the Act provides that:

“OFCOM must not revise or otherwise modify the relevant provisions unless they are satisfied that the revision or modification is -

- a) objectively justifiable in relation to the matters to which it relates;
- b) not such as to discriminate unduly against particular persons or against a particular description of persons;
- c) proportionate to what the modification is intended to achieve; and
- d) in relation to what is intended to achieve, transparent.”

A3.8 Section 60(3) further provides that:

“Before revising or otherwise modifying the relevant provisions, OFCOM must publish a notification -

- a) stating that they are proposing to do so;
- b) specifying the Plan or other document that they are proposing to revise or modify;
- c) setting out the effect of their proposed revisions or modifications;
- d) giving their reasons for making the proposal; and
- e) specifying the period within which representations may be made to OFCOM about their proposal.”

Annex 4

Notification of proposals for a modification to provisions of the National Telephone Numbering Plan under section 60(3) of the Communications Act 2003

1. Ofcom, in accordance with section 60 of the Act, hereby makes the following proposals for a modification to the provisions of the Numbering Plan.
2. The Condition has effect by reference to provisions of the Numbering Plan.
3. The draft modification to the Numbering Plan is set out in the Schedule to this Notification.
4. The reasons for making the proposals and the effect of the modification are set out in the accompanying document.
5. Ofcom considers that the proposed modification complies with the requirements in section 60(2) of the Act.
6. In making the proposals referred to above Ofcom have considered and acted in accordance with the six Community requirements in section 4 of the Act as well as performed their general duties under section 3 of the Act and their duty as to telephone numbering in section 63 of the Act.
7. Representations may be made to Ofcom about the proposals by **5pm on 13 September 2013**.
8. Copies of the Notification have been made available to the Secretary of State.
9. In this Notification-
 - 'Act' means the Communications Act 2003;
 - 'Condition' means General Condition 17 of the General Conditions of Entitlement set by the Director by way of publication of a Notification on 22 July 2003;
 - 'Ofcom' means the Office of Communications; and
 - 'Numbering Plan' means the National Telephone Numbering Plan published from time to time by Ofcom.

Signed by

A handwritten signature in blue ink, consisting of a stylized initial 'T' followed by the name 'Clarkson'.

David Clarkson
Competition Policy Director

A person authorised by Ofcom under paragraph 18 of the Schedule to the Office of Communications Act 2002.

19 July 2013

Draft Schedule

A. The following text shall be deleted from the Numbering Plan in 'Part B: Restrictions on the Adoption and use of Telephone Numbers in Part A' under 'B3: Specific Restrictions on Telephone Numbers'-

B3.1.3 Local Dialling shall not be provided from Geographic Numbers with a Geographic Area Code listed in the table below, with effect from the date specified.

Geographic Area Code	Effective Date
01202	1 November 2012

B. The deleted text shall be replaced with the following text-

B3.1.3 Local Dialling shall not be provided from Geographic Numbers with a Geographic Area Code listed in the table below, with effect from the date specified.

Geographic Area Code	Effective Date
01202	1 November 2012
01224	1 October 2014
01273	1 October 2014
01274	1 October 2014
01642	1 October 2014
01908	1 October 2014

Annex 5

Consultation questions

- A5.1 We have included three specific consultation questions at the end of Section 3 and we would like you to consider these when responding. We have set these questions out below for ease of reference. We also welcome general comments on our consultation proposals.

Question 1: Do you agree with our proposals that local dialling should be closed in the Five Area Codes - Aberdeen (01224), Bradford (01274), Brighton (01273), Middlesbrough (01642) and Milton Keynes (01908) - on 1 October 2014?

Question 2: Are you aware of any local or national events that may dilute consumer awareness communications/any other factors suggesting that 1 October 2014 is an unsuitable date/time of year to introduce the proposed changes to local dialling?

Question 3: Do you have any comments on the proposed modifications to the Numbering Plan set out at Annex 4 and/or on our view as to how the proposed modification meets the relevant legal tests in section 60(2) of the Act?

Annex 6

Ofcom's consultation principles

A6.1 Ofcom has published the following seven principles that it will follow for each public written consultation:

Before the consultation

A6.2 Where possible, we will hold informal talks with people and organisations before announcing a big consultation to find out whether we are thinking in the right direction. If we do not have enough time to do this, we will hold an open meeting to explain our proposals shortly after announcing the consultation.

During the consultation

A6.3 We will be clear about who we are consulting, why, on what questions and for how long.

A6.4 We will make the consultation document as short and simple as possible with a summary of no more than two pages. We will try to make it as easy as possible to give us a written response. If the consultation is complicated, we may provide a shortened Plain English Guide for smaller organisations or individuals who would otherwise not be able to spare the time to share their views.

A6.5 We will consult for up to 10 weeks depending on the potential impact of our proposals.

A6.6 A person within Ofcom will be in charge of making sure we follow our own guidelines and reach out to the largest number of people and organisations interested in the outcome of our decisions. Ofcom's 'Consultation Champion' will also be the main person to contact with views on the way we run our consultations.

A6.7 If we are not able to follow one of these principles, we will explain why.

After the consultation

A6.8 We think it is important for everyone interested in an issue to see the views of others during a consultation. We would usually publish all the responses we have received on our website. In our statement, we will give reasons for our decisions and will give an account of how the views of those concerned helped shape those decisions.

Annex 7

Responding to this consultation

How to respond

- A7.1 Ofcom invites written views and comments on the issues raised in this document, to be made **by 5pm on 13 September 2013**.
- A7.2 Ofcom strongly prefers to receive responses using the online web form at <http://stakeholders.ofcom.org.uk/consultations/local-area-codes/howtorespond/form>, as this helps us to process the responses quickly and efficiently. We would also be grateful if you could assist us by completing a response cover sheet (see Annex 8), to indicate whether or not there are confidentiality issues. This response coversheet is incorporated into the online web form questionnaire.
- A7.3 For larger consultation responses - particularly those with supporting charts, tables or other data - please email elizabeth.greenberg@ofcom.org.uk attaching your response in Microsoft Word format, together with a consultation response coversheet.

Responses may alternatively be posted or faxed to the address below, marked with the title of the consultation.

Elizabeth Greenberg
Ofcom
Competition Group
Riverside House
2A Southwark Bridge Road
London SE1 9HA

Fax: 020 7783 4109

- A7.4 Note that we do not need a hard copy in addition to an electronic version. Ofcom will acknowledge receipt of responses if they are submitted using the online web form but not otherwise.
- A7.5 It would be helpful if your response could include direct answers to the questions asked in this document, which are listed together at Annex 5. It would also help if you can explain why you hold your views and how Ofcom's proposals would impact on you.

Further information

- A7.6 If you want to discuss the issues and questions raised in this consultation, or need advice on the appropriate form of response, please contact Elizabeth Greenberg on 020 7783 4163

Confidentiality

- A7.7 We believe it is important for everyone interested in an issue to see the views expressed by consultation respondents. We will therefore usually publish all responses on our website, www.ofcom.org.uk, ideally on receipt. If you think your

response should be kept confidential, can you please specify what part or whether all of your response should be kept confidential, and specify why. Please also place such parts in a separate annex.

- A7.8 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and will try to respect this. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A7.9 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's approach on intellectual property rights is explained further on its website at <http://www.ofcom.org.uk/about/accoun/disclaimer/>

Next steps

- A7.10 Following the end of the consultation period, Ofcom intends to publish a statement in October 2013.
- A7.11 Please note that you can register to receive free mail Updates alerting you to the publications of relevant Ofcom documents. For more details please see: http://www.ofcom.org.uk/static/subscribe/select_list.htm

Ofcom's consultation processes

- A7.12 Ofcom seeks to ensure that responding to a consultation is easy as possible. For more information please see our consultation principles in Annex 6.
- A7.13 If you have any comments or suggestions on how Ofcom conducts its consultations, please call our consultation helpdesk on 020 7981 3003 or e-mail us at consult@ofcom.org.uk . We would particularly welcome thoughts on how Ofcom could more effectively seek the views of those groups or individuals, such as small businesses or particular types of residential consumers, who are less likely to give their opinions through a formal consultation.
- A7.14 If you would like to discuss these issues or Ofcom's consultation processes more generally you can alternatively contact Graham Howell, Secretary to the Corporation, who is Ofcom's consultation champion:

Graham Howell
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA

Tel: 020 7981 3601

Email: graham.howell@ofcom.org.uk

Annex 8

Consultation response cover sheet

- A8.1 In the interests of transparency and good regulatory practice, we will publish all consultation responses in full on our website, www.ofcom.org.uk.
- A8.2 We have produced a coversheet for responses (see below) and would be very grateful if you could send one with your response (this is incorporated into the online web form if you respond in this way). This will speed up our processing of responses, and help to maintain confidentiality where appropriate.
- A8.3 The quality of consultation can be enhanced by publishing responses before the consultation period closes. In particular, this can help those individuals and organisations with limited resources or familiarity with the issues to respond in a more informed way. Therefore Ofcom would encourage respondents to complete their coversheet in a way that allows Ofcom to publish their responses upon receipt, rather than waiting until the consultation period has ended.
- A8.4 We strongly prefer to receive responses via the online web form which incorporates the coversheet. If you are responding via email, post or fax you can download an electronic copy of this coversheet in Word or RTF format from the 'Consultations' section of our website at www.ofcom.org.uk/consult/.
- A8.5 Please put any parts of your response you consider should be kept confidential in a separate annex to your response and include your reasons why this part of your response should not be published. This can include information such as your personal background and experience. If you want your name, address, other contact details, or job title to remain confidential, please provide them in your cover sheet only, so that we don't have to edit your response.

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Changes to making local calls in five area codes

To (Ofcom contact): Elizabeth Greenberg

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing

Name/contact details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts?

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)