

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

**Consultation response from Nexbridge Communications Limited**

- Question 1: Do you agree with our assessment of the impact of charging for geographic numbers?

Yes. The charging principle where shortage of supply is imminent ensures effective use of numbering and availability for those CPs who require ranges in the area affected in future. There is obviously consideration given to the fact that consumer broadband connections do not need a telephone number to allow connectivity, and as fewer individuals appear to be subscribing to fixed landline telephone numbers with their broadband, the supply will ultimately resolve itself within existing CP allocations. I would also add that the use of 055 (Corporate Numbering) and 056 (VoIP & LIECS) seems very under-utilised, and where CPs require numbers that do not need to be area specific (which VoIP tends to be), maybe Ofcom should consider offering these ranges as alternatives to geographic in areas in low availability. I would also suggest that when specific ranges do return to sensible levels of availability (i.e. are no longer scarce), that charging is dropped for those area codes.
- Question 2: Do you agree with our proposal to continue to charge for geographic numbers in area codes where scarcity is or is likely to be a concern?

Where ranges are scarce, then yes, the incentive to return ranges where areas are scarce or liable to be scarce within a number of years can be achieved through charging. In the same vein, however, where sufficient capacity is returned for an area, then charging for that area should be removed.
- Question 3: Do you agree with our proposal that charging should be applied to any area code which is forecast to have 10 per cent or less numbers remaining available for allocation in 2025?

Yes, I think this is a reasonable proposal. Again, I would suggest that this be reviewed every 2 years to ensure that where ranges are returned to greater than 10% of numbering remaining, that charging is removed for the area code affected and the proposed General Condition 17 changes reflect this flexibility during the proposed period of implementation of this change to chargeable geographic area codes.
- Question 4: Do you agree with our proposal to retain the discount approach for ported numbers and numbers used for

The portion of ported numbers is usually very small, and the discount is often negligible, however I agree with the principle of the discount approach.

WLR and public payphones  
provided under a USO?

- Question 5: Do you agree with our proposals for amending GC17.17(b) and 17.33?

As highlighted in my answer to question 3, GC17 should consider a more granular and flexible approach to the return of number blocks, and only continue to charge where the affected area codes remain below 10% of capacity, with a revised list being provided at point of CP invoice each year. I would expect that the return of ranges would happen within the first two years of implementation of the charging proposed in this consultation, and hence suggestion that ranges should not continue to be charged where availability has increased.