



14 February 2014

BT's response to Ofcom's consultation - Telephone Number Application Form; Proposed modifications to the Telephone number application forms within existing numbering policy

Introduction

1. BT on the whole supports Ofcom's proposed changes to the existing number application forms process to secure greater efficient, effective management and use of UK numbering resources whilst not affecting consumers or current numbering policy.
2. BT agrees that as demand for UK Numbering resources increases and becomes even more complex, advanced software and number management systems are required to speedily assign numbering to Communication Providers in order to fulfil customer orders and deliver services and products.
3. The introduction of an online application portal is seen as a positive change allowing BT and other Communication Providers to apply for number ranges in real time and replacing the paper-based applications, streamlining processes and hopefully improve on number allocation timescales.
4. The amalgamation of the current set of sixteen application forms into a single dynamic application form which builds on line, has value in modernising and simplifying the procedure for both Communication Providers and Regulator. However there are examples on the proposed forms where BT feels Ofcom needs to consider providing further clarification on certain aspects of specific number ranges and type of service either on the on-line application form itself or in the National Telephone Numbering Plan. This would provide additional guidance to Communication Providers in selecting the most appropriate number ranges needed to deliver services for their end users.
5. Updating of profile and contact information via online portal with on-demand access, in our opinion would be of benefit allowing for this information to be accurately maintained online rather than being paper based. However assurances are sought from Ofcom that access to the on-line portal and

security of individual account held information is restricted to the designated official numbering contact or account holder.

6. Although generally supportive of Ofcom's proposed changes, BT has concerns over the supply of BT network, commercial business and service information via an online portal. BT question Ofcom's requirement for this specific information given that current General Condition 17 rules directs Communication Providers to use allocated numbering capacity effectively and efficiently and given Ofcom currently has sufficient powers to enforce withdrawal of number ranges which are not adopted within 6 months of allocation.
7. BT believes as an alternative to requesting complex and highly sensitive network and commercial information, Ofcom could use this opportunity to resolve the difficulties of CPs to port numbers where those are hosted onto other CPs' networks. Ofcom should consider requesting CPs to indicate whether they will be hosting the allocated numbers onto another CPs network and, in this case, making the name of the hosting CP publicly available. Ofcom could then use this information to assist compliance with GC18 by pointing out to the Range Holder that they must have process in place with the hosting CP for number export. Alternatively Ofcom could include in the application form a box for the Range Holder to sign confirming that they have agreements in place with their host to port their numbers as per GC18.

Question 1: Do you have any comments on the proposed material modifications to the information requested in the number application form? In considering this question, please refer to the explanation of the proposals set out in Section 3 and the proposed modifications to the number application form as highlighted in blue in the schedule to the draft Direction in Annex 3.

8. Much of the information on our CP profile and Contact detail is readily available from within BT as indicated above as an alternative to requesting sensitive information. Other information source such as Companies House has previously been shared with Ofcom as part of the existing number application process. As it is not clear why information on network and / or service is required, BT believes that such information should not be provided as part of the numbering administration regime.
9. The following comments focus on section 3 Telephone Numbers requested for allocation.
10. On the whole the information required from CP's by Ofcom to complete the new proposed amalgamated online forms is very similar to that already supplied on the current sixteen application forms although BT believes clarification is required on how many number range selections can be made per online application.
11. Whilst BT agrees with Ofcom's thoughts on a 'tightening up' of existing GC17.19 'Withdrawal of Number Allocation' rules i.e. 6 month use it or lose it

policy; BT questions the need for additional information as BT believes that Ofcom already has sufficient withdrawal powers under GC 17.

12. For 05 Non-geographic numbers Ofcom should consider including additional information resulting from current 0500, or future 05x consultations in new proposed online form.
13. The current s8 and s9 application forms provides Service Type / Number range starting / and Number block size guide information which assists Communication Providers in selecting and applying for the appropriate number range for their service is not included in Ofcom's current proposals. If it is not possible to include this guide information in the proposed new online application form Ofcom should consider enhancing National Telephone Numbering Plan.
14. BT also notes that the current s10 application form for allocation of Access Code for Directory Enquiry (DQ) Facilities (118xxx) requires 1st, 2nd & 3rd choice of code selection from CPs is different from current practice. The online application 'proposed choices' only lists two choices and that the existing form also contains an additional column 'Trading Name of company if different from Company Name'.
15. The proposed amalgamation of current s14 & s15 forms for International Signalling Point Codes (ISPC), National Signalling Point Codes (NSPC) & Partial Line Calling Line Identity Codes (PCLI) BT believes may cause confusion for Communication Providers. The NSPC and PCLI code formats differ and would need further clarification either the new online application form or in the National Telephone Numbering Plan from Ofcom.
16. Similarly, clarification would also be needed for the Mobile Network Codes (MNC) & Carrier Pre-Selection Codes (CPS) and MNC/ MCC & CPS codes as they have different formats and again may confuse CP's in their application selections.
17. As with all numbering application requests submitted to Ofcom, Communications Providers are required to 'provide a justification' in applying for that numbering capacity, given that such justifications could be complex and lengthy it may be helpful to CPs to know how many characters or lines of text are permitted on the online form.

Question 2: Do you have any comments on our view as to how the proposed modifications meet the relevant legal tests?

18. BT believes whilst much of the proposed modifications to the Telephone Number Application form goes some way to meet GC17 much of the additional information is already available to Ofcom. The additional detailed network and / or service information / documentation, in our view goes against statutory obligations in that such information is not proportionate and not justifiable in relation to numbering allocation.

End