

Additional comments:

This whole consultation could have been designed to exclude the ordinary phone user.

1. The excessive use of obscure language -mandate (Q 12.1) instead of make compulsory, and abbreviations. The Campaign for Clear English would have had a field day with these documents! The consultation should have been split into two parts - one for the ordinary phone user, written in plain, simple English, with much shorter accompanying documentation, and only dealing with issues pertinent to the end user, and the other for the phone companies and other organisations.

2. It should have been made possible to save this form and come back to it later. I have spent many hours on it, spread over several days. I have done this by downloading all the pdf files and having several windows open simultaneously, so that I could look up abbreviations, read the questions, and read the Annexes relevant to that question. I have now gone back online and cut and pasted each individual answer back into your form. I rang Ofcom about 3 weeks ago about this, but nothing has been done to make the form saveable (complaint 1208605114).

I wonder how many other ordinary phone customers who would have liked to have given their views on some of Ofcom's proposals were put off completing the form after struggling for an hour or so online, as I nearly was, and I write as an Oxford graduate.

Question 4.1: Do you agree that the analysis set out in Section 4 and the supporting annexes which draws on our initial assessment in the December 2010 review, stakeholder comments and the further research undertaken in 2011, appropriately characterises the market , the market failures and the effects on consumers? If not please set out your alternative views:

4.1 I agree. Non-geog numbers such as 0844 with Virgin are not included in "packages". They also cost a lot more. I know this because I often check. This involves considerable effort, going online, opening one pdf file of many pages to look up the charge band, then opening another pdf file to find the connection charge and ppm. I use a website to find a geog alternative if possible. I often will not call a company if they only have a non-geog number, especially if I anticipate being put on hold for some time. I regard these numbers as a rip-off of the consumer. Furthermore, I think their use should be prohibited for socially important services, such as doctors' surgeries or social services, or sections of Dept for Work and Pensions.

Re para 4.60. It is stated in many parts of Ofcom's pdf files that not many complaints have been received about specific issues, eg the charges for 0871 numbers. This may well be because one cannot just send a quick email to Ofcom, as I wanted to last year when my mail order clothing company changed from 0870 to 0871 and I saw how much more I was going to be paying to listen to 5-10 minutes of pop music on hold. When I could not find a webform to click on I gave up. It was only when I discovered that BT were charging 5p for one 0844 number but Virgin 12p to connect and 13ppm (or vice versa) that I went again onto Ofcom's website to look for an email form. After about an hour's fruitless searching I found this consultation instead, which is exactly what I wanted. There seems to be no way of emailing Ofcom about a general concern, so perhaps this is why so few complaints have been received.

Question 5.1: Do you have any comments on our Equality Impact Assessment? In particular do you agree with our view that our proposals for

changes to non-geographic numbers are likely to have an overall positive impact on the equality groups identified in Annex 15?:

5.1 I agree.

Question 9.1: Do you have any comments on our assessment, and in particular the additional evidence (gathered since the December 2010 Consultation) which we have used to support our assessment, on our provisional conclusion that the unbundled tariff should be applied to the revenue-sharing NGC number ranges?:

9.1 I think the unbundled tariff is a considerable improvement on having to scroll through page upon page of 08 numbers and their charges every time I want to make a call, but is still going to leave consumers unclear about how much they are going to pay for a call, since each telephone company can add as much as they choose to the SC for each call.

Question 10.1: Do you agree with our proposal that the AC should be allowed to vary between tariff packages but that OCPs should be subject to a tariff principle permitting only one AC for non-geographic calls? If not please explain why.:

10.1 I agree.

Question 10.2: Do you agree with our proposed structure for the AC, in particular that: (i) that the AC should be a pence per minute charge only, but can be subject to a minimum one minute call charge (ii) that the AC should not vary by time of day and (iii) that the AC can be included as part of call bundles/inclusive call minutes provided that inclusion does not differentiate by number range? If not please explain why.:

10.2 I agree, but it would be much better if all the landline companies had the same AC for each type of number, and all the mobile companies a different AC charge for theirs. Price competition between phone companies could be for geographical numbers, line rentals and prices of their packages. This would mean that prices to call a number could then be given for SC and AC.

Question 10.3: Do you agree with our proposal not to impose a cap on the AC in the first instance? If not please explain why:

10.3 No. In the past you have only applied caps to BT. As my experience with the high prices charged by Virgin in comparison with BT for some 084 numbers has shown, this has not encouraged competition as you had stated it would. The fact that it was such a pain to have to look up each individual 08 number meant that Virgin (and no doubt others) could charge a lot more than BT, and most customers did not realise, or thought it was worthwhile because of other factors in Virgin's favour. Also, since you state that customers in general are not price-sensitive for non-geogs, (although this might change with all the publicity generated by the proposed changes.), your failure to impose a cap might lead to excessive charging by some companies.

Question 10.4: Do you agree with our proposed approach for the structure of the SC? In particular that: (i) bespoke SCs should be prohibited (ii) that no further restrictions on the SC structure should be required (e.g. allowing ppm and ppc SCs, no restriction of ToD charging subject to ability of billing systems to pass through the charges) If not, please explain why and provide evidence if possible.:

10 4 (i)Yes
(ii)No view

Question 10.5: Do you agree with our proposals to impose maximum SC caps for the purposes of protecting the identity of the number ranges? Do you agree that the caps should apply to the 084, 087 and 09 ranges and that they should be set exclusive of VAT in the Numbering Plan? If not please explain why and provide evidence to support your position if possible.:

10 5 Yes, there should be SC caps on these numbers given. As for setting them exclusive or inclusive of VAT in the Numbering Plan, I have no view providing that in material provided to the consumer prices are always given inclusive of VAT. This is because it is illegal for companies which have to charge VAT for their goods or services to advertise prices ex-VAT to the public, so it would be wrong for SC prices to be quoted ex-VAT in material for the public. If the prices are set ex-VAT in the Numbering Plan, I don't see why they can't be rounded and quoted to one decimal place in advertising material if necessary. Most people could cope with a price of 5.3 pence per minute if they read that.

Question 10.6: Do you agree with our proposed cap of 5.833p for the 084 range and 10.83p for the 087 range? If not please explain why.:

10 6 No view, but, for the sake of the consumer, I think the use of 084 should be prohibited for socially important services, such as doctors' surgeries or social services, NHS Direct, or sections of Dept for Work and Pensions, as it is more expensive than landline and not currently included in phone packages, and 087 banned altogether for such services.

Question 10.7: Do you agree that the number of SC price points should be restricted? Do you agree that that restriction should be somewhere between 60 and 100, and where within that range do you consider would be optimal? Do you have any comments in relation to how Ofcom should decide where in that 60 to 100 range the maximum number of SC price points available should be set?:

10 7 The implications of this were beyond my understanding as a consumer.

Question 10.8: Do you agree with Ofcom's proposed approach to agree the relevant SC price points with industry rather than specifying them as part of the Numbering Plan? Do you have a particular preference for which SC price points are necessary within the different number ranges? What criteria would you propose for the selection of price points?:

10 8 The implications of this were beyond my understanding as a consumer.

Question 10.9: Do you agree with our assessment on the location of the AHP on BT's and other CPs' networks? If not, please explain why you disagree.:

10 9 The implications of this were beyond my understanding as a consumer.

Question 10.10: Do you agree that for calls that route via a transit network, the TCP should pay for transit? If not, please explain why you disagree. In particular please explain your views on how incentives can be included within an 'OCP pays' approach to ensure the TCP seeks to interconnect directly (where this is efficient) and not to reduce its points of interconnection at the expense of the OCP and efficient end to end call routing.:

10 10 The implications of this were beyond my understanding as a consumer.

Question 10.11: Do you agree with our proposed approach for calls between two non-BT CPs, both for the case when a transit network is used and for when direct interconnection is implemented? If not, please explain why you disagree.:

10 11 The implications of this were beyond my understanding as a consumer.

Question 11.1: Do you agree with Ofcom's assessment that an unbundled tariff should also apply to the 0845 and 0870 ranges? If not please explain why.:

11.1 Yes, definitely.

Question 12.1: Do you agree with our proposal not to mandate the presentation of disaggregated AC and SC charges on customers' bills? Do you agree with our view that it should be up to OCPs to decide the best way to present these charges to their customers on bills OCPs but that we require that at a minimum, the OCPs should include the customer's AC on the bill they receive?:

12.1 Yes, it should not be compulsory to state AC and SC separately on customers' bills. However, at present it requires a fair bit of persistence online to find out how much my phone company charges for 0845 and 0870 numbers (I receive email bills). It would be a good idea if Ofcom employed "mystery customers" for each phone company to ensure that it is quick and easy to find out the AC for each type of number for real-life customers who might not be very internet-savvy, but have chosen that option because of a discount on their bill for paperless billing.

Question 12.2: Do you agree with the requirement for a central SC database. If so what would be your preferred approach ? public sector or private sector provision? If you do not agree with the need for the database what approach

for the dissemination and verification of SC would you prefer and why. Are there any other issues with respect to the database you would wish to raise? :

12.2 I agree with having a central SC database, but as a consumer have no view on whether it should be public or private sector. It would be handy to have easy access to it to check charges, however, eg via a clickable weblink on my email bill or via Googling a memorable name for it (unlike most of the names in the pdf files with this consultation).

Question 12.3: Do you agree with the need for reformation of the existing processes for number range building and tariff change notification? If so, what do you consider to be the key characteristic of a revised set of processes? Do you consider that there is a need for regulatory intervention in their establishment, if so why and on what basis should Ofcom intervene.:

12.3 Reading of the existing processes for the first time, I agree that they need reforming. Other than that, I do not feel qualified to comment.

Question 12.4: Do you consider that there is a need for additional regulatory intervention in the area of end-users? access to non-geographic numbers, in addition to General Condition 20? If so why and what form should such an obligation take? :

12.4. I have never had any problems calling a non-geog from my non-BT landline or mobile, and as the Ofcom documentation states that so far the current regulations have worked OK, then I would wait and see if any problems develop under the new system.

Question 12.5: What steps / actions do you consider need to be undertaken to ensure changes to the structure and operations of non-geographic numbers are successfully communicated to consumers? :

12.5 All the actions proposed in the Ofcom documentation are fine, but much more important, I feel, are printed leaflets to be placed in GP surgeries, CAB offices, social security offices, etc, but also posted by "snail mail" to every household. I specify the latter, as many people have chosen online billing to save money, but are not frequent internet surfers, and dislike reading information online, and would possibly not notice an email attachment with their bill. Therefore I would suggest the mailshot to be done to every household separate from any phone bill, and government funded.

Question 12.6: Do you agree with our proposal that existing price publication obligations (with some modifications) are sufficient to ensure that consumers are made aware of their ACs? Do you agree that we would need to specify the AC as a key charge?:

12.6 I do not think that the existing price publication obligations are satisfactory because only BT prices are stated when companies state how much it will cost to call them. This is because only BT prices have been capped, but it means as a non-BT customer I have no idea how much I pay for 0871, 0844, 0843, etc, unless I go online and wade through pages and pages of 2 separate look-up tables to find out. If all landline phone company prices had been capped

along with BT then this problem would have been avoided. I have found when I checked that my major landline phone company was charging much more than BT for some 0844 numbers - 12p connection & 13ppm as opposed to BT 5p.

The new system should be an improvement on this, although there is still a real danger that when the new system is introduced, prices will be quoted for BT customers only, by adding the AC and SC together and quoting that figure, and it will be difficult for Ofcom to police them all.

Question 12.7: Do you agree with our provisional view that the requirement for SPs to advertise their SCs could be implemented through a condition on SPs that is enforced through an industry Code of Practice and the ASA? Are there any other options (beyond the two outlined) which Ofcom should be considering? What do you consider is the best approach for securing industry commitment and developing a Code of Practice?:

12.7 I am unclear whether you intend SPs to advertise their SCs in the terms given in your pdf file - "The charge for this call will be no more than 7 pence per minute plus your phone company's standard Access Charge", or "This call will cost you (eg) 4 pence per minute plus your phone company's standard Access Charge". The latter would be vastly preferable. Other than that I have no views.

Question 12.8: Do you agree internationally originated calls should be charged at the same SC as an equivalent domestic call? If not, please set out your reasons. Do you agree that originators should be able to set a separate AC level for roaming calls in a given country, though the other characteristics of the AC should still apply? :

12.8 No views.

Question 12.9: We would welcome stakeholder views on our proposed approach for applying the unbundled tariff to payphones. Do you agree that it is appropriate to allow payphones to set a minimum fee for non-geographic calls?:

12.9 No views.

Question 12.10: Do you consider there is a need to exempt business to business telephony contracts from some of the constraints of the unbundling regime? Is so what exemptions do you consider appropriate and why are they necessary (please give examples of the conflicts you would identify if exemptions are not provided). To which contracts should the exemptions apply and why?:

12.10 No views.

Question 12.11: Do you agree with our proposal that implementation should take place 18 months from the date of the final statement?:

12.11 Yes.

Question 13.1: Do you agree with our estimates of the billing costs for implementing the unbundled tariff, taking into account the discussion in Annex 19? If not, please explain why and provide evidence to support your response, particularly of the level of costs you are likely to incur as a result of our proposals.:

13.1 No views.

Question 13.2: Do you agree with our estimates of the level of migration and misdialling costs for service providers who may migrate as a result of the unbundled tariff (taking into account the analysis and evidence in Annex 12)? If not please explain why and provide evidence.:

13.2 No views.

Question 13.3: Do you agree with our estimates of the communication costs of implementing the unbundled tariff? In particular: (i) the costs of OCP communication with their customers and (ii) the costs of TCP communication with their SP customers. If not, please explain why and provide evidence to support your response, particularly of the level of costs you are likely to incur as a result of our proposals.:

13.3 No views.

Question 13.4: Do you have any comments on our impact assessment for the unbundled tariff? Please provide evidence to support your response.:

13.4 No views.

Question 16.1: Do you agree with our assessment of the options for the 080 range? In particular, do you agree with our preferred option of making 080 genuinely free to caller? If not, please explain why.:

16.1. I agree. In particular, your proposal that 080 should be free to callers from mobiles as well. The Orange argument that customers choose the convenience of mobiles over fixed landline phones is specious. As a disabled rail passenger, I arrange my disabled assistance in advance by ringing an 0800 number from my home landline, but if left stranded on a train or alone on a deserted platform (as sometimes happens) I have to ring for assistance on the same 0800 number using my Orange mobile, but I don't know how long I will be on hold before the phone is answered. This is expensive and stressful. I welcome this proposal wholeheartedly, as will those people who are not able even to have a landline phone.

Question 16.2: Do you have any comments on the analysis used to develop the Impact Assessment Range for the mobile origination charge and the Mobile

Maximum Price range for 080 calls as set out in Annexes 21 to 25? Please provide evidence to support your comments.:

16.2. No views.

Question 16.3: Do you agree with our estimates of the level of migration and misdialling costs for service providers who may migrate as a result of our proposal to make the 080 range free to caller (taking into account the evidence and analysis in Annex 12)? If not please explain why and provide evidence.:

16.3. No views.

Question 16.4: Do you agree with our proposal to treat the 116 ranges in the same way as the 080 range (i.e. designate all as free to caller) as set out in detail in Annex 27? If not please explain why. :

16.4 I had never heard of 116, and could not quote one organisation having a 116 number. I therefore don't feel I should comment on this.

Question 17.1: Do you agree with our provisional view that it is appropriate for an access condition to be imposed on all TCPs hosting designated Free to caller numbers requiring them to: (i) purchase wholesale origination services for calls terminating on designated free to caller ranges from any requesting OCP (ii) to do so on fair and reasonable terms and conditions (including charges) and (iii) notify their SP customers of any initial revision to the charges for wholesale origination services within two months of Ofcom imposing the requirement for zero maximum prices. If not do you consider any ex ante intervention is required? Please give your reasons for or against such intervention and your preferred approach.:

17.1 No views.

Question 17.2: Do you agree that the access condition does not need to be extended to OCPs, but is effectively binding on both parties? If not please give your reasons.:

17.2 No views.

Question 17.3: Do you have any other comments on our proposed implementation approach for making Freephone free to caller? For example, do you consider it necessary for Ofcom to impose a requirement on SPs to publicise that 080 calls are free and do you have any other suggestions for how SPs could be encourage to publish that at the point of call? Are there any other implementation issues which need to be taken into account? :

17.3 Most organisations using free to caller numbers are providing a socially useful service, or the provision of a freephone number is an inducement to join their service (eg car breakdown). Therefore, the SPs should be only too willing to publicise that 080 calls are free, and I see no need to change the existing arrangements. What is new is that the calls are free from mobiles, but I don't think this needs to be publicised separately by the SP every time they give their phone number. This should be done in the publicity provided by Ofcom as part of the details of the new tariffs, and word should soon get round to the vulnerable people who really need this information.

What is needed is publicity around 116 numbers, but it is unfair to single out SPs using this number for mandatory statements, so this would have to come from Ofcom in the same publicity drive. I had never heard of 116, and I consider myself as very aware of phone numbers and charges.