



Vodafone's response to Ofcom's consultation

Telephone Number Application Form

January 2014

Headquartered in the UK, Vodafone is a global business investing and innovating in all the markets we serve to deliver for our customers. Our home market is no exception and Vodafone in the UK has now successfully integrated the former fixed line business of Cable & Wireless Worldwide, resulting in the creation of a genuinely unique converged communications provider. With £2.5M being invested each day in our UK network, we remain committed to delivering the very best for our customers.

Introduction

We welcome this opportunity to respond to Ofcom's proposed modifications to the telephone number application forms within existing numbering policy. Ofcom has portrayed the context of this consultation as being the update of its number management system in response to increasingly sophisticated and continuing demand for numbers. We support Ofcom's investment in improving system capabilities to meet these demands, but we are disappointed that the consultation itself does not reflect the importance of these developments to industry:

- Ofcom has not considered the impact of the changes upon individual operators and has wrongly concluded that an assumption of negligible impact is consistent with the move to any online system.
- The consultation has been used to tighten number allocation and management policies by requiring consistent additional information from operators in relation to allocations and number usage details. It is misleading to characterise such material process changes as a mere modification to existing numbering forms when in practice they introduce an entirely new process. Whilst Vodafone believes this will undoubtedly assist Ofcom's number allocation due diligence processes and be beneficial, we are disappointed that the consultation has not provided operators with examples of the level of detail it expects to receive in order for them to assess the impact.
- The consultation, even allowing for additional time over the Christmas period, has been at the shortest end of the spectrum available to Ofcom and consequently does not allow for a full assessment of the impact upon individual operators' resource levels or upon their systems. It seems that Ofcom has set the time period in relation to its policy assessment conclusions and not in relation to the operational impact and importance of the changes to stakeholders. It is of note that when Ofcom last considered replacing its numbering management system (with consequent impact on the user interface), industry was engaged via workshops to scope the design.

Impact of proposals

Vodafone has over time developed its number management system (RNM) to automatically populate Ofcom's number application forms. The proposed changes make this facility entirely redundant. It is not known to us whether Vodafone is alone in taking this approach, but it is clear that Ofcom is mistaken in its assessment that moving to a web based portal has negligible impact.

In order to replicate the current approach or indeed to reflect the increasing complexity of numbering demands, we assume that Ofcom intends to develop and make available for operators an xml interface with its portal. This would align with the approach taken between operators for service provisioning,

Vodafone works to a tight six-monthly development budget and resource envelope in terms of both IT development and resource planning. Ofcom's 'modifications' are unexpected and therefore unbudgeted in our current envelope of activity. Accordingly Vodafone expects Ofcom to ensure an implementation period of 9 months to be introduced before the implementation of the new portal.

Vodafone would also flag to Ofcom that the NGCS developments in this area which are mentioned, but not addressed, will require a similar consultation process and implementation phase before changes can be made to the Numbering resources on the Ofcom database. As Ofcom knows Vodafone uses direct downloads of this information for routing, number management and internal provisioning validation purposes within our systems. As a result a proper implementation period for these changes will be required, which we do not believe has been incorporated within the current NGCS project plan.

Finally, the proposed modifications also affect our current auditing methods and the information that we currently provide to Ofcom when requesting new numbers. . As Ofcom moves to require the information for all numbers in the specified area regardless of which switch they are on Vodafone will be required to develop our systems and reporting tools accordingly. Until this work is completed we request that Ofcom provides additional time to operators when requesting auditing information.

Vodafone Limited
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