

# CABLE&WIRELESS WORLDWIDE RESPONSE TO CONSULTATION ON SAFEGUARDING THE FUTURE OF GEOGRAPHIC NUMBERS

Cable&Wireless  
Worldwide

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## INTRODUCTION

Cable&Wireless Worldwide (CWW) welcomes the opportunity to comment on Ofcom's consultation on Safeguarding the Future of Geographic Numbers. As one of the largest assignees of geographic numbers, we are a key stakeholder to the process. Whilst the proposals will result in additional cost for CWW, we acknowledge that they represent the best overall solution for safeguarding the ongoing supply of geographic numbers.

## ANSWERS TO OFCOM QUESTIONS

**QUESTION 1: DO YOU HAVE ANY COMMENTS ON: I) OUR PROPOSAL TO CLOSE LOCAL DIALLING IN THE BOURNEMOUTH 01202 AREA CODE ON 1 NOVEMBER 2012; II) OUR VIEW AS TO HOW THE PROPOSED MODIFICATION TO THE NUMBERING PLAN IN RELATION TO CLOSING LOCAL DIALLING IN THE 01202 AREA CODE ON 1 NOVEMBER 2012 MEETS THE RELEVANT LEGAL TESTS IN SECTION 60(2) OF THE ACT; OR III) THE PROPOSED MODIFICATION TO THE NUMBERING PLAN IN RELATION TO CLOSING LOCAL DIALLING IN THE 01202 AREA CODE (SET OUT IN ANNEX 7)?**

CWW agrees with Ofcom's proposals to close local dialling in Bournemouth and that the proposal meets the relevant legal tests. We broadly support the proposed modification to the Numbering Plan as set out in Annex 7, but question whether it may have been better to future-proof the wording by adding an extra column to Appendix A, stating whether local dialling is to be provided in each area code.

**QUESTION 2: DO YOU HAVE ANY COMMENTS ON: I) OUR VIEW AS TO HOW THE PROPOSED PILOT SCHEME MEETS THE RELEVANT LEGAL TESTS IN SECTION 47(2) OF THE ACT; AND II) THE PROPOSED AMENDMENTS TO GC17 TO IMPLEMENT THE PILOT SCHEME (SET OUT IN ANNEX 8)?**

CWW broadly agrees that the proposed pilot scheme meets the relevant legal tests.

We remain of the view that CPs using shorter number lengths, hence not using numbers efficiently, should pay charges that are reflective of that inefficiency and the legal test of "objective justification" would promote this approach. Absent this, an economic negative externality is left uncorrected because all CPs need to meet the cost of premature exhaust of numbers and the ongoing inefficiency of having to break out isolated ranges of abnormal length, while the inefficient CP's customers benefit from shorter number lengths. However, CWW accepts that consideration of this aspect can be deferred until the issue of shorter number lengths is addressed more generically.

Subject to the observations on calculation granularity described in our response to Question 5, CWW has two comments to the amendments to GC17 set out in Annex 8:

1. We note that the payment terms proposed are 14 days from date of invoice. Even with the background material provided earlier in the year, CWW does not believe this is a realistic timescale for CPs to verify the invoice to check its accuracy, let alone organise payment. We propose that 56 days would be a more reasonable timescale for payment.
2. CWW notes the arrangements for discounts based upon the volume of numbers exported by the rangeholder CP. However, we note that ultimately the legal text refers to numbers being “ported”, with no definition of “ported” being given. We are mindful that CPs may seek to limit their exposure to number charges by, for example, portraying numbers that are actually in common parlance “sub-allocated” as “ported”. With no legal definition within the proposed amendments to GC17, it is possible that Ofcom would struggle to refute such an assertion. Therefore CWW suggests that the term “Ported Number” should point to GC18, where the relevant legal definitions do exist.

**QUESTION 3: DO YOU HAVE ANY COMMENTS ON: I) OUR PROPOSALS TO MAKE 100 BLOCKS OF 100-NUMBERS AVAILABLE FOR ALLOCATION IN THE 11 FIVE-DIGIT AREA CODES; II) OUR SUBMISSION OF HOW THE PROPOSED MODIFICATION TO THE NUMBERING PLAN IN RELATION TO 100-NUMBER BLOCKS MEETS THE RELEVANT LEGAL TESTS IN SECTION 60(2) OF THE ACT; OR III) THE PROPOSED MODIFICATION TO THE NUMBERING PLAN IN RELATION TO 100-NUMBER BLOCKS (SET OUT IN ANNEX 7)?**

CWW agrees with the proposals, that the legal tests have been met, and that the proposed modifications to the Numbering Plan are appropriate.

**QUESTION 4: DO YOU AGREE WITH OUR PROPOSED APPROACH FOR PORTED AND WLR NUMBERS? IF NOT, PLEASE EXPLAIN WHY YOU DISAGREE.**

CWW agrees with the proposals set out in Annex 3 to the consultation.

**QUESTION 5: DO YOU HAVE ANY COMMENTS ON THE PROPOSED ADMINISTRATIVE ARRANGEMENTS FOR NUMBER CHARGING IN THE PILOT SCHEME AS SET OUT IN PARAGRAPH A4.37?**

CWW continues to believe that charging on a daily basis imposes an undue administrative burden. We favour assessing the charge on a monthly basis. This means that when the final invoice is supplied by Ofcom, any validation of it can be achieved solely by using the numbering allocations files on the Ofcom website, which record only the month of allocation and not day. Absent this, it

will be necessary for CPs to maintain a database of the specific date on which number ranges were assigned, in order to validate the invoice (or, alternatively, for Ofcom to change the granularity of the “change” field in the files).

As stated in our response to Question 2, CWW considers 14 day payment terms to be unrealistic.