



Elizabeth Greenberg,  
Ofcom - Numbering Project Manager  
Competition Group  
Riverside House  
Southwark Bridge Road  
London SE1 9HA

2<sup>nd</sup> May 2012

Dear Liz,

Re: Geographic Telephone Numbers – Safeguarding the future of geographic telephone numbers – further consultation dated 20<sup>th</sup> March 2012 (the “Consultation”).

Please find below Sky's views on the questions & issues raised in relation to the Consultation.

Sky has responded to the two previous number allocation consultations published by Ofcom (in November 2010 and September 2011) and our views remain unchanged. Principally, Sky continues to object to Ofcom's plans to charge CPs for number allocation. Sky considers that the implementation of a charging regime for numbers should be a 'last resort' option and that it is not appropriate to do this in the short-term. Instead, Sky considers that improvements to number management and the number allocation process could ease many of concerns that Ofcom has identified and these changes should be implemented first before the introduction of a wider charging scheme (i.e. beyond the planned pilot scheme). Sky looks forward to participating in Ofcom's future consultation on the administrative processes for number allocation and management and we would welcome clarification from Ofcom as to its timing.

Sky supports Ofcom's proposal to allocate numbers in blocks of 100 within the 11 five-digit area codes. In addition, Sky considers that Ofcom should be able to accept the return of numbers in blocks of 100. This would enable more unused numbers to be returned - thereby extending the availability of numbers to CPs who need them (which can be re-allocated in blocks of 100, if needed).

Sky has no issues with Ofcom's proposal to close local dialling in Bournemouth. Sky is represented in the working group that Ofcom has put in place to manage these changes and we do not believe that there are any significant issues in making the relevant network changes before 1<sup>st</sup> November 2012.

As stated previously, Sky expects the administrative / development costs of tracking and billing for ported numbers to outweigh the commercial benefit of re-charging 'number allocation costs' to the owning CP. Sky considers that re-charging these costs is only commercially viable for CPs with a large volume of numbers exported to other CPs (i.e. BT and, potentially, VM). Finally, we have no specific comments on the administrative processes Ofcom proposes to support the initial charging trial from April 2013.

Yours sincerely,

Ben Shaw,  
Head of Industry Engagement  
BSkyB