

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Telephone Number Application Form. Proposed modifications to the telephone number application form for 084, 087 and 09 numbers within existing numbering policy

To (Ofcom contact): Liz Greenberg

Name of respondent: Peter Farmer

Representing (self or organisation/s): Gamma Telecom Holdings Limited

Address (if not received by email):

Kings House, Kings Avenue West, Newbury, Berkshire, RG14 5BY

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing ☒ Name/contact details/job title ☐

Whole response ☐ Organisation ☐

Part of the response ☐ If there is no separate annex, which parts?

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

☐

Name Peter Farmer

Signed (if hard copy)

Liz Greenberg
Office of Communications
Riverside House
2A Southwark Bridge Road
LONDON
SE1 9HA

22nd May 2015

By e-mail

Reference: Telephone Number Application Form. Proposed modifications to the telephone number application form for 084, 087 and 09 numbers within existing numbering policy (the “Consultation”)

NON-CONFIDENTIAL

Dear Liz,

Gamma Telecom Holdings Limited (“**Gamma**”) welcomes the opportunity to respond to this consultation published on 8th May 2015; our confidential response is appended.

Introduction

Gamma is a Network Operator that provides wholesale fixed and mobile telephony and data services, mainly to resellers who sell to the Small to Medium Enterprise sector throughout the UK. Gamma has a turnover c£175m per annum.

This consultation response relates to Gamma Telecom Holdings Limited and its group companies. Any conflict between the implied position of Gamma in any UK Competitive Telecommunications Association (UKCTA), Internet Telephony Services Providers Association (ITSPA) or Federation of Communication Services (FCS) responses is accidental and we consider that our views in this response should prevail.

Gamma trusts that this response addresses the questions posed by the Office of Communications (“Ofcom”) and would welcome the opportunity to elaborate on any points in more detail if required. Please don’t hesitate to contact me, Peter Farmer (0333 240 3217, peter.farmer@gamma.co.uk, address as per letter head), for further detail in the first instance.

General Comments

Given the short nature of the Consultation, Gamma has chosen to respond in brief as opposed to addressing the individual question(s), which we trust is acceptable.

With the exception of one caveat below, on the assumption that the validation employed on the form allows lawful innovation in Service Charges above and beyond those 80 launched on 1st July 2015, Gamma considers that Ofcom has discharged its statutory obligations and we support the proposed change.

We would, however, appreciate clarity in any forthcoming statement on this matter regarding enforcement of unlawful Service Charges. In other words, it is unclear from the Consultation whether or not Ofcom will use the submitted information to decline to allocate numbers that are in breach of the prevailing Service Charge caps. It is imperative that this first failsafe in consumer protection be robust and effective, for all the obvious reasons.

Yours sincerely,

[✂]

Peter Farmer
Head of Regulatory Affairs
Gamma Telecom Holdings Limited