



# Managing Northern Ireland telephone numbers

Proposals for number conservation measures in the  
028 area code and additional local numbers for Belfast and  
Londonderry

Consultation

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## Section 1

# Summary

- 1.1 This document is about Ofcom's management of geographic telephone numbers in the 028 Northern Ireland area code. We are proposing measures to ensure the ongoing supply of number blocks to allocate to communications providers (CPs). The measures proposed would not require numbers to change and would not affect existing numbers in any other way.

## Background

- 1.2 It is Ofcom's duty to ensure that the best use is made of the UK's telephone numbers and to encourage efficiency in the way that numbers are used. To fulfil this duty, we must ensure that sufficient and appropriate telephone numbers are available to allocate to CPs so that they can supply services to consumers and businesses, to thereby support competition, consumer choice and innovation in service provision.
- 1.3 Competition in fixed-line voice services has been developing strongly for many years, and there are now over 100 CPs with allocations of Northern Ireland numbers. This has led to more competition and choice for consumers. It has also generated an increase in demand from CPs for geographic numbers.
- 1.4 Our stock of geographic numbers is limited. We are facing challenges in ensuring the ongoing availability of sufficient number blocks to allocate to CPs so that they can provide a choice of services to consumers. Numbers need to be allocated to CPs in large blocks. The number block size is determined by routing constraints in some long-established telephone networks that use equipment designed many years ago to analyse the phone number's digits to route the call. These constraints mean that the minimum size of block that we can allocate to any CP must be sufficiently large to accommodate these restrictions, otherwise the older networks would not be able to route calls appropriately. This results in many CPs using only a fraction of the numbers they have been allocated.
- 1.5 Importantly, there are sufficient numbers available across Northern Ireland to provide services to consumers. The current challenges do not present a risk to the availability of numbers for consumers' use. This is because if, hypothetically, our stocks of geographic number blocks available for allocation were to run out, there would still be sufficient numbers already allocated to CPs to ensure that consumers could obtain new fixed-line voice services. However, their choice of provider would be restricted only to those who happen to have geographic numbers available in the relevant area from previous allocations. Consumers could then be constrained in their choice of supplier and denied the benefits of competition and new services.
- 1.6 The problem, therefore, lies in ensuring that there remains an adequate supply of number blocks to allocate to CPs across Northern Ireland

## 028 Northern Ireland area code

- 1.7 The whole of Northern Ireland is covered by the 028 area code. This is followed by eight-digit local telephone numbers. Numbers in the 028 area code are divided across 34 specific areas in Northern Ireland. The first two digits of the local number provide additional location significance and denote the specific area (for example,

028 20XXXXXX for Ballycastle numbers and 028 25XXXXXX for Ballymena numbers). The digits and area names are set out in Appendix A of the National Telephone Numbering Plan ('the Numbering Plan').<sup>1</sup>

- 1.8 We are currently experiencing a scarcity of number blocks to allocate to CPs in the 34 Northern Ireland geographic areas, with shortage most pronounced in Belfast and Londonderry.<sup>2</sup>

## Proposals for consultation in this document

- 1.9 We have considered two approaches to ensuring that the supply of number blocks in the 028 area code is sufficient to meet CPs' requirements, and thereby to support competition, consumer choice and innovation in service provision. These approaches are:
- Option 1: conserving numbers by allocating them to CPs in blocks of 1,000 rather than 10,000; and
  - Option 2: increasing the supply of numbers by adding an additional two-digit range for local numbers in each of the Northern Ireland areas (i.e. in the form 028 XXyyyyyy). Allocation of numbers would remain at the 10,000 block level.
- 1.10 Option 1 'Conservation measures' works by taking the current stock of numbers and dividing it into smaller number blocks for allocation. Block size is reduced from 10,000 to 1,000 numbers, resulting in a tenfold increase in block supply. Smaller blocks can more closely align the size of allocation to CPs' level of demand and those with a justified need for more numbers may be allocated multiple 1,000-number blocks. We have implemented conservation measures in 591 out of 610 UK area codes and have seen an 85 per cent reduction in the average annual number allocation rate as a result.
- 1.11 Conservation measures have no impact on consumers. CPs' networks would need to analyse an additional digit to route calls to numbers allocated in smaller blocks. We understand that allocation of smaller number blocks has a generic impact on CPs with older networks. We have sought initial views from CPs likely to be affected on whether the additional digit analysis required to route calls to numbers allocated in smaller blocks in Northern Ireland would be feasible. Preliminary indications are that the impact could be accommodated and that this option is likely to be manageable for them.
- 1.12 Option 2 'increasing the supply of numbers' works by adding an additional two-digit number range for local numbers for each of the 34 Northern Ireland areas, increasing supply by an additional 100 blocks of 10,000 numbers per area.
- 1.13 This option may have an impact on consumers. An increase in ranges associated with an area may reduce consumers' ability to recognise the location significance provided by the local number. It may also have competition impacts if consumers prefer to take numbers from CPs still holding available numbers in the original two-digit range.

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<sup>1</sup> Ofcom is responsible for the publication of the Numbering Plan, which sets out numbers available for allocation and any restrictions on their adoption or use. *The National Telephone Numbering Plan*, current version published 13 December 2013 is available on our website at:

[http://stakeholders.ofcom.org.uk/binaries/telecoms/numbering/Numbering\\_Plan\\_Dec\\_2013.pdf](http://stakeholders.ofcom.org.uk/binaries/telecoms/numbering/Numbering_Plan_Dec_2013.pdf).

<sup>2</sup> Geographic Area names as designated in the Numbering Plan.

- 1.14 Having considered these options, our preferred approach, on which we are consulting in this document, is to:
- introduce conservation measures in all 34 Northern Ireland areas; and
  - in Belfast and Londonderry, where there is a greater demand for numbers and more imminent scarcity, increase the supply of number blocks by adding a further two-digit range for local numbers in each area: 028 96 for Belfast in addition to 028 90 and 95, and 028 72 for Londonderry in addition to 028 71. This additional measure is required for Belfast and Londonderry as there are insufficient 10,000-number blocks remaining for conservation measures alone to ensure a sufficient supply of number blocks to meet CPs' needs. Numbers in all ranges would be allocated in 1,000-number blocks.

## Next steps

- 1.15 The Numbering Plan sets out numbers available for allocation and any restrictions on their adoption or use, including the designation of conservation areas and its effect on number allocation and use. Our proposals for geographic number conservation measures across the 028 area code and increasing the supply of numbers in Belfast and Londonderry would require a modification to the Numbering Plan to bring them into effect.
- 1.16 We are seeking responses to the proposed modifications to the Numbering Plan and general comments on our proposals by **5pm on 9 May 2014**.
- 1.17 Once this consultation has closed, we will take account of all submissions received and then reach a decision.
- 1.18 We plan to publish the statement and the revised Numbering Plan in June 2014.

## Section 2

# Introduction and background

## The need for this consultation

- 2.1 Ofcom manages the UK's telephone numbers under the Communications Act 2003 ('the Act'). It is our duty, as set out in section 63 of the Act, to ensure that best use is made of the UK's numbering resource and to encourage efficiency and innovation for that purpose. To fulfil this duty we must ensure that sufficient and appropriate telephone numbers are available to meet demand and it is Ofcom's responsibility to set the policy on how numbers may be used. We allocate blocks of numbers to CPs so that they can use those numbers to deliver services to their customers. We are responsible for the publication of the Numbering Plan, which sets out numbers available for allocation and any restrictions in their adoption or use.
- 2.2 Competition in fixed-line voice services has been developing strongly for many years. This has led to more competition and choice for consumers. It has also generated an increase in demand from CPs for geographic numbers.
- 2.3 Our stock of geographic numbers is finite. We face challenges in ensuring the ongoing availability of sufficient number blocks to fulfil CPs' requirements. If we do not meet this challenge successfully, scarcity of numbers may constrain CPs' ability to compete for customers.
- 2.4 Importantly, there are sufficient numbers available across Northern Ireland to provide services to consumers. The current challenges do not present a risk to the availability of numbers for consumers' use. This is because if, hypothetically, our stocks of geographic number blocks available for allocation were to run out, there would still be sufficient numbers already allocated to CPs to ensure that consumers could obtain new fixed-line voice services. However, their choice of provider would be restricted only to those who happen to have geographic numbers available in the relevant area from previous allocations. Consumers could then be constrained in their choice of supplier and denied the benefits of competition and new services.
- 2.5 Therefore, where the supply of blocks of numbers required for the provision of communications services is limited, Ofcom's duty under section 63 of the Act requires us to consider if there are ways to make better use of numbers and if so to take action to rectify the situation. This is because a lack of available numbers would hinder competition, consumer choice and innovation in the provision of networks and services.
- 2.6 Currently, the supply of blocks of geographic numbers for allocation to CPs is limited in the 028 area code for Northern Ireland. This consultation presents the options we have examined and sets out our proposed approach for addressing the situation.

## Ofcom's policy for managing geographic numbers

- 2.7 In 2006 we carried out a strategic review of the UK's telephone numbers ('the 2006 numbering policy review'), with a view to safeguarding the future of numbers and providing a framework to address numbering concerns. Our concluding statement

*Telephone Numbering*<sup>3</sup> set out the following policy principles to guide our strategic decisions on how telephone numbers are managed:

- the numbers consumers want are available when they are needed;
- the numbers consumers currently use are not changed if this is avoidable;
- the meaning which numbers provide to consumers is protected;
- number allocation processes support competition and innovation; and
- consumers are not avoidably exposed to abuse.

2.8 The review included our general policy for managing demand for geographic numbers. We recognised that consumers value highly the ability to keep their geographic numbers and that action was required to avoid the need for changes to numbers or the way they are used in the future.

2.9 Based on our policy principles, we decided to manage geographic numbers in the following way:

- we will take steps now to ensure the availability of geographic numbers for consumers in a manner that maintains their continuity and meaning, and causes consumers the least disruption and cost;
- we will ensure that sufficient numbers are available so that scarcity of numbering resource does not create barriers to entry or service provision;
- our management of numbers will be neutral in the treatment of CPs; it will take account of the link between numbering and routing and the consequential impact that numbering policy has on the markets for routing and number portability;
- tariff transparency should be retained, so that a caller pays what he/she expects to pay for a call to a geographic number; and
- our policy approach will not hasten the erosion of location significance but will recognise (and not stifle) the effect of network and service evolution on that significance.

2.10 Guided by these policy principles, we plan for the actions required to increase the supply of number blocks when and where needed. We recognise that all options for increasing the supply of numbers cause some disruption to consumers and businesses and we look for ways to minimise this by taking measures to drive efficiency in number use.

### **Allocation of smaller number blocks: Conservation Areas and Standard Areas**

2.11 The general risk in meeting demand for new geographic numbers in certain area codes is a shortage of number blocks to allocate to CPs, rather than a shortage of numbers to meet consumers' needs.

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<sup>3</sup> *Telephone Numbering: Safeguarding the Future of Numbers*, 27 July 2006 available at <http://stakeholders.ofcom.org.uk/binaries/consultations/numberingreview/statement/statement.pdf>.



- 2.12 We allocate contiguous blocks of geographic numbers to CPs by area code. The number block size is determined by routing constraints in some long-established networks. Telephone networks analyse the digits of dialled phone numbers to decode the necessary information for routing and tariffing of calls. Some older networks use equipment designed many years ago to perform this function. The limited capacity of that equipment restricts the number of digits of each dialled phone number that those networks can decode into routing information. This means that the minimum size of block that we can allocate to any CP must be sufficiently large to accommodate these restrictions, otherwise calls could not be routed successfully by the older networks.

### Conservation Areas

- 2.13 Demand from CPs for the pool of available numbers is increasingly high, whereas the use of numbers in allocated blocks is often very low. We have sought to address this tension through the allocation of smaller number blocks, known as conservation measures, while recognising the routing constraints set out in the preceding paragraph.
- 2.14 Originally we allocated all geographic numbers in blocks of 10,000. In 2002, we reduced the block size to 1,000 numbers in nine areas that we forecast would run out of available blocks to allocate to CPs within two years. This decision introduced the concept of 'Conservation Area'. In 2006 we redefined 'Conservation Area' in the Numbering Plan to mean "*a geographic area that Ofcom believes has a realistic expectation of number exhaustion within the next five years*". In 2012, we replaced this definition in the Numbering Plan with "*a geographic area indicated as such in Appendix A of ..[the Numbering] Plan*".
- 2.15 Paragraphs B3.1.7 and B3.1.8 of the Numbering Plan set out the restrictions on the adoption and use of numbers in Conservation Areas. In summary, these restrictions are that:
- numbers will be allocated in blocks of 1,000 following Conservation Area status being given to an area code; and
  - numbers previously allocated at the 10,000 block level when the area was a Standard Area should be treated as ten units of 1,000 numbers for the purpose of assigning numbers to customers. CPs may not assign a number from a different unit until a substantial proportion of the numbers in the first unit have been assigned.
- 2.16 Between 2005 and 2008 we introduced conservation measures in a further 246 area codes. In 2010 we made all remaining '0' plus four-digit area codes<sup>4</sup> (except for Jersey 01534 and Guernsey 01481) into conservation areas, with numbers allocated in blocks of 1,000. Currently, conservation measures are in place in the vast majority of geographic area codes, i.e. in 591 out of the 610 UK area codes.
- 2.17 It is necessary to reduce the block size for allocations while there is still a sufficient supply of 10,000 number blocks available to divide into 1,000 number blocks, otherwise areas will run out of numbers before conservation can have an effect. In taking this action, conservation measures have been successful in prolonging number block availability by aligning the size of allocation more closely to the local

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<sup>4</sup> Area codes in the format 01XXX followed by a six-digit local number. The majority of area codes are in this format.

demand for numbers and extending the life of the remaining numbers by reducing the rate at which they are allocated. On average, we have seen an 85 per cent decrease in the annual number allocation rate in an area following reduction of block size.

## Standard Areas

- 2.18 The remaining area codes where conservation measures have not been introduced cover larger cities and have '0' plus two- or three-digit area codes (this includes the Northern Ireland 028 area code). These areas are characterised as 'Standard Areas' in the Numbering Plan and geographic numbers continue to be allocated in blocks of 10,000. CPs are required to use numbers in units of 1,000 to ensure efficient use and to facilitate withdrawal of unused 1,000-number block units should conservation measures be applied in the future and there is a need to increase the supply of available blocks for allocation.<sup>5</sup>

## Geographic number management review - 2010 to 2012

- 2.19 Despite the effect of conservation measures and a number of administrative processes applied (i.e. periodic audits of allocated number block use, unused number block withdrawal, strengthening the number allocation process), our forecasts demonstrated that in a number of area codes there was still a risk of running out of geographic numbers to meet CPs' demand. For that reason, we reviewed our management of geographic numbers during 2010 to 2012 ('the geographic number management review').<sup>6</sup>
- 2.20 The geographic number management review confirmed our policy principles and approach to managing geographic numbers as set out in paragraphs 2.7 and 2.9 above, including that conservation measures are central to our approach to managing geographic numbers.
- 2.21 The geographic number management review also considered the appropriate action to take where conservation measures are insufficient to manage demand. We decided that, where a '0' plus four-digit area code needs more local numbers, we would increase the supply of numbers by closing local dialling. This means that fixed-line phone users in those areas will need to dial the area code when making local calls. This change to local dialling enables us to release new numbers for use without requiring any changes to existing phone numbers. If, in the future, more numbers are needed in that area, we would introduce an overlay code – which would mean that two area codes cover the same geographic area.
- 2.22 Action to increase the supply of numbers in an area code inevitably results in some cost and disruption to consumers, CPs and Ofcom. We therefore consulted on how to promote CPs' efficient use of the existing supply of numbers to reduce or avoid the need for such measures and the resulting impacts. We decided to introduce number charging on 1 April 2013 in a pilot scheme covering 30 area codes with the fewest number blocks remaining available for allocation. We also introduced the limited rollout of 100-number block allocations in 11 rural areas with '0' plus five-digit area codes (i.e. in the format 01XXXX) in response to a particular scarcity created by the code and number structure in those areas.

<sup>5</sup> Paragraph B3.1.6 of the Numbering Plan.

<sup>6</sup> *Geographic telephone numbers: Safeguarding the future of geographic numbers*: three documents published on 25 November 2010, 7 September 2011 and 20 March 2012, and *Promoting efficient use of geographic telephone numbers*, published on 18 July 2012. All documents can be found at: <http://stakeholders.ofcom.org.uk/consultations/geographic-telephone-numbers/>.

## The 028 Northern Ireland area code

- 2.23 The structure of geographic numbers differs slightly in Northern Ireland from most of the rest of the UK. In 2000, the geographic numbering scheme in Northern Ireland was changed, migrating from a number of '0' plus four- and five-digit area codes to one '0' plus two-digit area code (028) for the whole of Northern Ireland.
- 2.24 The 028 area code is followed by eight-digit local numbers. Numbers in the 028 area code are divided across 34 specific areas in Northern Ireland. The first two digits of the local number provide additional location significance and denote the specific area (for example, 028 20XXXXXX for Ballycastle numbers and 028 25XXXXXX for Ballymena numbers). The digits and area names are set out in Appendix A of the Numbering Plan.
- 2.25 Apart from Belfast, each area is currently assigned one two-digit range. Belfast was assigned a second two-digit range in 2007<sup>7</sup> (028 95 in addition to 028 90) due to increased demand for numbers in that area.
- 2.26 We have identified a shortage of geographic number blocks available for allocation to CPs in Northern Ireland and a realistic expectation of running out in all Northern Ireland areas within the next five years. Taking into account that:
- the issue identified in Northern Ireland is that of number block shortage in the foreseeable future;
  - we need to ensure that sufficient numbers are available so that scarcity does not create barriers to entry or service provision;
  - it is our duty, as set out in section 63 of the Act, to ensure that best use is made of the UK's numbering resource and to encourage efficiency and innovation for that purpose; and
  - we need to take steps now to ensure the availability of geographic numbers in a manner that maintains their continuity and meaning, and causes consumers the least disruption and cost;

we have considered options for addressing the shortage of number blocks for allocation to CPs in the 028 Northern Ireland area code. Our assessment is set out in section 3 of this document.

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<sup>7</sup> *Availability of Numbering Resource*, Ofcom statement, published 3 May 2007, <http://stakeholders.ofcom.org.uk/binaries/consultations/numresource/statement/statement.pdf>.

## Section 3

# Options for ensuring a sufficient supply of number blocks across Northern Ireland

- 3.1 In Section 2 we set out our duty to ensure the supply of sufficient and appropriate telephone numbers across the UK. We explained that we had forecast that Northern Ireland would need an increased supply of geographic number blocks in the near future. In this section we present the options we have considered for increasing the supply of geographic number blocks, assess their potential impacts, and, following on from this, set out the option we currently prefer.

## Current situation

- 3.2 Each of the 34 Northern Ireland areas has been assigned a two-digit range for local numbers. This provides 100 blocks of 10,000 numbers for allocation to CPs. Belfast, where number demand is higher, has two ranges assigned and therefore 200 blocks of 10,000 numbers.
- 3.3 Figure 1 below sets out the number of blocks remaining available for allocation (as at 9 January 2014), the rate at which we allocate blocks per year and when we forecast running out of the existing supply. Currently, each of the Northern Ireland areas has between three and 38 blocks of 10,000 numbers remaining available for allocation. They include unused blocks that have been returned to us from CPs following a recent audit. Our average annual allocation rate is 12 blocks in Belfast, and between seven and eight blocks in the other areas. Shortage is most pronounced in Belfast (three blocks remaining) and Londonderry (four blocks). Other areas have at least 16 blocks available, with the majority over 30 blocks remaining.
- 3.4 Taking into account the current number block availability and allocation rate, we forecast that, without intervention, Belfast and Londonderry will run out of available number blocks for allocation this year and that the rest of the Northern Ireland areas have a realistic expectation of running out of number blocks within the next five years. The forecast for number block availability across the 34 locations within the 028 area code requires us to consider appropriate measures for addressing scarcity in the whole of the Northern Ireland area code.

**Figure 1: Current situation (as at 9 January 2014) and forecast exhaustion of number blocks for the 34 Northern Ireland areas**

Area Code	Geographic Area	Total of free 10,000-number blocks	Allocation rate (blocks per year) <sup>8</sup>	Forecast exhaustion
028	Antrim (94)	31	7.1	2017
	Armagh (37)	27	7.4	2017
	Ballycastle (20)	32	7.6	2017
	Ballyclare (93)	31	7.0	2018

<sup>8</sup> The allocation rate is calculated by averaging the quantity of annual number block allocations in the last seven years (2007 to 2013).

	Ballygawley (85)	37	6.9	2018
	Ballymena (25)	22	7.0	2016
	Ballymoney (27)	34	6.9	2018
	Banbridge (40)	33	7.1	2018
	Bangor (Co. Down) (91)	17	7.7	2015
	Belfast (90 and 95)	3	12.0	2014
	Carrickmore (80)	37	6.9	2018
	Coleraine (70)	28	7.1	2017
	Cookstown (86)	31	7.4	2017
	Downpatrick (44)	29	7.4	2017
	Dungannon (87)	31	7.0	2017
	Enniskillen (66)	33	7.3	2018
	Fivemiletown (89)	35	6.9	2018
	Kesh (68)	35	7.1	2018
	Kilrea (29)	38	6.6	2019
	Kircubbin (42)	35	7.0	2018
	Larne (28)	32	7.0	2018
	Limavady (77)	32	7.4	2017
	Lisburn (92)	20	7.4	2016
	Lisnaskea (67)	36	6.9	2018
	Londonderry (71)	4	8.3	2014
	Magherafelt (79)	26	7.4	2017
	Martinstown (21)	34	7.3	2018
	Newcastle (Co. Down) (43)	31	7.6	2017
	Newry (30)	16	8.1	2015
	Newtownstewart (81)	36	6.9	2018
	Omagh (82)	27	7.7	2017
	Portadown (38)	17	7.7	2015
	Rostrevor (41)	35	7.0	2018
	Saintfield (97)	36	7.0	2018

## Options for ensuring the availability of number blocks in Northern Ireland

3.5 We have considered two approaches to ensuring that the supply of number blocks in the 028 area code is sufficient to meet CPs' requirements, and thereby to support competition, consumer choice and innovation in service provision. These approaches are:

- Option 1: conserving numbers by allocating them to CPs in blocks of 1,000 rather than 10,000; and
- Option 2: increasing the supply of numbers by adding an additional two-digit range for local numbers in each of the Northern Ireland areas (i.e. in the form 028 **XX**yyyyyy). Allocation of numbers would remain at the 10,000 block level.

## Option 1 – conservation measures

- 3.6 The first option we are putting forward for consultation is to introduce conservation measures in the 028 area code. As explained in paragraphs 2.13 to 2.17, conservation measures are our established means of increasing the supply of geographic number blocks for allocation to CPs by reducing the unit of allocation from 10,000 to 1,000 numbers. Conservation works by increasing the effectiveness with which CPs use geographic numbers through aligning the size of allocation more closely to CPs' actual demand.
- 3.7 As mentioned in paragraph 2.18, '0' plus two- and three-digit area codes are characterised as Standard Areas in the Numbering Plan and numbers are allocated in blocks of 10,000. Standard Areas are generally larger cities with an overall higher requirement for numbers. The number structure, with a shorter area code and longer local numbers than the majority of the UK's area codes, provides for a larger supply of numbers for the area. As CPs generally have a higher demand for numbers in larger cities, and the pool of available number blocks is greater in '0' plus two- and three-digit area codes, we have not considered it necessary to introduce conservation measures in any Standard Areas to date.
- 3.8 The 028 area code is currently designated as a Standard Area in the Numbering Plan. However, the number structure for 028 is different from the structure in other 02X area codes. The location significance provided by the first two digits of the local number segregates the numbers available into 34 separate areas. This means that the 79 million numbers available in the 028 area code are restricted geographically in the way that they can meet demand.
- 3.9 The location significance provided in the local number digit structure means that for each two-digit range assigned to an area in Northern Ireland, there is a limit of 100 blocks of 10,000 numbers available. In this respect, the structure of numbers in the 028 area code has introduced similar constraints to those in '0' plus four-digit area codes. The scarcity of number blocks available for allocation to CPs that characterised many '0' plus four-digit area codes, and led to the need for conservation measures, now exists in the 028 area code.

## Option 2 – increase the supply of numbers

- 3.10 The second option we are putting forward for consultation is to increase the overall supply of numbers in each Northern Ireland area and retain allocation of numbers in blocks of 10,000. Increasing the supply of numbers requires adding additional two-digit ranges for local numbers in each of the areas in Northern Ireland. We took this approach in 2007 when we needed to increase the supply of number blocks in Belfast.
- 3.11 There are 79 possible two-digit ranges for Northern Ireland (028 20 to 028 98), of which 35 are already in use. This approach would require assigning a further two-digit range to each of the 34 Northern Ireland areas, leaving ten ranges for future expansion where needed. Number demand forecasts would indicate whether more than one additional two-digit range would be required in an area.

## Assessment of options

### Impact assessment

- 3.12 Impact assessments form a key part of the policy-making process and provide a transparent way of considering different options for regulation, including not regulating. We expect to carry out impact assessments for the majority of our policy decisions.
- 3.13 The analysis set out in this document comprises Ofcom's impact assessment as defined in section 7 of the Act.

### Equality impact assessment

- 3.14 We assess the effect of functions, policies, projects and practices on equality in accordance with the Equality Act 2010 and Section 75 of the Northern Ireland Act 1998.
- 3.15 Our Section 75 duties require us to have due regard to the need to promote equality of opportunity and regard to the desirability of promoting good relations in Northern Ireland. Our revised Northern Ireland Equality Scheme sets out how we fulfil our equality duties in Northern Ireland, including how we carry out Equality Impact Assessments (EIAs).
- 3.16 EIAs also assist us in making sure that we are meeting our principal duty of furthering the interests of citizens and consumers. We have therefore also considered what (if any) impact the issues under consideration in this document may have on equality. Where relevant, we have highlighted our consideration of equality issues in the document.
- 3.17 The conclusion of our EIA is that we do not believe our proposal will have an impact on the promotion of equality of opportunity and good relations in Northern Ireland. This conclusion is based on the policy affecting CPs rather than citizens or consumers directly, and the benefits of the policy applying equally across Northern Ireland. As such, we do not propose to carry out a more in-depth EIA.

### Impact on consumers

- 3.18 In accordance with our policy principles, we recognise that consumers value the location significance provided by geographic numbers and that our policy approach should not hasten its erosion.
- 3.19 **Option 1** (conservation measures) would be unseen by consumers and would have no adverse effect on consumers' interests. On the contrary, conservation measures are designed to extend the availability of current numbers and thereby delay the need to increase supply. All measures to increase number supply have some degree of impact on consumers.
- 3.20 **Option 2** (increase the supply of numbers) would require adding additional two-digit ranges for local numbers in all Northern Ireland areas. This increases the number of ranges associated with an area, which may dilute consumers' understanding of location significance. Until the new local numbers become well-known, consumers may be confused and not associate them with the local area. Consumers may consider it a disadvantage to be given a number from the new range for their service



and businesses may be concerned that it gives the impression that they are not established or recognised as being local.

## Impact on CPs

- 3.21 **Option 1** (conservation measures) involves the allocation of numbers to CPs in smaller blocks, which has an impact on certain CPs with older networks. As described in paragraph 2.12 older networks have limited capacity to analyse the digits in a dialled telephone number for routing purposes. In Northern Ireland, we anticipate that this would affect a limited number of CPs. However, these would be the largest providers in Northern Ireland in terms of the size of their networks, the level of call traffic handled and the quantity of customers.
- 3.22 The impact of conservation measures on long-established networks is well documented and accepted by Ofcom. The need for networks to analyse more digits to route calls may result in an administrative and operational impact on CPs. There are also infrastructure limitations on older networks' ability to route at the 1,000-number block level, which is why we introduce conservation measures in a phased manner and only where necessary.
- 3.23 In the 2006 numbering policy review, we acknowledged that conservation measures would have some implications for CPs, particularly those with older networks. We commissioned a consultancy study by Intercai Mondiale to look into the feasibility of increasing the number of Conservation Areas. The study concluded that there was no overarching technical reason why CPs could not support conservation measures in additional geographic areas.<sup>9</sup> Taking the study's conclusions into account, we considered that any impact on CPs' networks of conservation measures was likely to be outweighed by the benefits for competition and consumer interests delivered by maintaining the availability of geographic number blocks without the need for increasing the supply. This led to our ongoing commitment to conservation measures as the most appropriate means of meeting CPs' demand for geographic numbers.
- 3.24 However, we note that the Intercai Mondiale study was general in nature and did not look at any area specifically (i.e. it did not address whether conservation measures could be supported in Northern Ireland, for instance). Mindful that we have not asked CPs to consider conservation measures in Northern Ireland in the past, we identified the CPs with older networks that are likely to be affected by allocation of smaller number blocks and asked for their initial views on the two options and, in particular, whether allocation of smaller blocks in Northern Ireland could be accommodated. Preliminary indications were that increasing the supply of numbers would have less impact on their networks, but that conservation measures were likely to be manageable for them.
- 3.25 We understand that a greater impact on older networks arises if we withdraw unused 1,000-number block units from allocated blocks of 10,000 numbers. We have undertaken this measure in conservation areas in the past to increase the supply of blocks available for allocation and promote efficient number use. In Figure 2 below we set out the effect of conservation measures on number block availability in each of the 34 Northern Ireland areas. We consider that the supply of number blocks available after implementing conservation measures in Northern Ireland should be sufficient to meet demand for many years without the need to withdraw unused 1,000-number block units and increase the impact on CPs. We are not, therefore,

<sup>9</sup> *Finer digit analysis of telephone numbers for routing purposes*, published 23 February 2006, <http://stakeholders.ofcom.org.uk/binaries/consultations/numberingreview/annexes/digitanalysis.pdf>.



planning such an exercise if conservation measures are introduced in Northern Ireland.

- 3.26 **Option 2** (increase the supply of numbers) involves making additional two-digit ranges available for allocation in each Northern Ireland area. CPs would need to make some adjustments in their networks to recognise the new ranges and route calls accordingly. However, we anticipate these to be minor and would not have an ongoing impact once the new ranges were implemented.
- 3.27 CPs would need to educate their customers on the location significance of the new ranges until they become established and recognised. This may take some time, and is difficult to estimate, as there will be varying timespans between Ofcom making the new ranges available, allocating blocks of new numbers to CPs and those numbers being put into service and used by customers.
- 3.28 CPs may face competition issues under this option. Until the new local numbers become well-known, consumers may be confused and not associate them with the local area. They may actively seek a CP with an available stock of numbers from the established range and avoid CPs with numbers from the new range.

### **Impact on number block supply**

- 3.29 **Option 1** (conservation measures) is a well-established means of extending the supply of number blocks by reducing the block size for allocation and increasing efficient number use. This option is forecast (see Figure 2 below) to provide sufficient number blocks to meet demand for the foreseeable future in most areas (i.e. for between 19 and 57 years depending on the area, and for over 40 years on average).
- 3.30 In Belfast and Londonderry, however, the remaining stock of 10,000-number blocks for allocation is very low, which means that conservation measures alone would have a limited effect. As only three 10,000-number blocks remain available for allocation in Belfast and four blocks in Londonderry, conservation measures applied to those blocks are forecast only to increase number supply to 2016 in Belfast and 2018 in Londonderry. Therefore, in Belfast and Londonderry, conservation measures would not be sufficient on their own and would need to be combined with another measure to ensure number blocks are available for allocation for the foreseeable future.
- 3.31 We consider that the most appropriate additional measure to combine with conservation measures would be the introduction of a further two-digit number range each for Belfast and Londonderry. This would be consistent with our policy principles for managing geographic numbers in that it would ensure sufficient numbers would be available for allocation and is a measure used previously to increase number supply in Belfast.
- 3.32 Our forecast of the effect of conservation measures on number block availability is based on our expectation that a block of 1,000 numbers would be sufficient to meet most CPs' demand in any given area. Our experience of conservation area implementation is that the annual number allocation rate has reduced by 85 per cent on average.
- 3.33 Looking at Northern Ireland number allocations to date, the majority of CPs with numbers across Northern Ireland (currently 64 CPs) have been allocated only one block per area. Only four CPs (BT, TalkTalk, Virgin Media and Vodafone) have more than two number blocks allocated in a 028 area. Therefore, we anticipate that most CPs want a presence in all Northern Ireland areas but do not require more than one

allocation to meet demand (i.e. a block of 1,000 numbers would meet most CPs' requirements). CPs who have a justified need for more than 1,000 numbers in an area can be accommodated by multiple block allocations.

- 3.34 **Option 2** (increase the supply of numbers) is forecast to provide us with sufficient number blocks to meet CPs' demand for the next 11 to 22 years depending on the area (see Figure 2 below). Due to the higher demand for number blocks in Belfast, we forecast that one additional range for local numbers would last only eight years. Therefore, in Belfast, Option 2 would require a further range to be added to the Numbering Plan (making a total of four ranges for Belfast) to ensure number blocks were available for allocation for the foreseeable future across Northern Ireland. We forecast that the addition of two ranges for Belfast would extend 10,000-number block availability to 2030.
- 3.35 Figure 2 sets out the forecast exhaustion for Northern Ireland areas under Options 1 and 2. Forecasts, by their nature, are subject to uncertainties, particularly when as long-term as those below. Therefore, the forecast years for number block exhaustion should be taken only as relative indications of availability and not realistic expectations of when number blocks would run out.

**Figure 2: Forecast exhaustion for Northern Ireland areas under Options 1 and 2**

Area Code	Geographic Area	Current forecast exhaustion	Option 1 forecast exhaustion - includes one additional range for Belfast and Londonderry <sup>note 1</sup>	Option 2 forecast exhaustion - includes two additional ranges for Belfast <sup>note 2</sup>
028	Antrim (94)	2017	2057	2030
	Armagh (37)	2017	2049	2030
	Ballycastle (20)	2017	2055	2033
	Ballyclare (93)	2018	2057	2033
	Ballygawley (85)	2018	2067	2036
	Ballymena (25)	2016	2044	2036
	Ballymoney (27)	2018	2063	2033
	Banbridge (40)	2018	2059	2033
	Bangor (Co. Down) (91)	2015	2035	2030
	Belfast (90 and 95)	2014	(2016) >2070	(2022) 2030
	Carrickmore (80)	2018	2067	2036
	Coleraine (70)	2017	2052	2034
	Cookstown (86)	2017	2055	2034
	Downpatrick (44)	2017	2052	2033
	Dungannon (87)	2017	2057	2036
	Enniskillen (66)	2018	2058	2036
	Fivemiletown (89)	2018	2064	2034
	Kesh (68)	2018	2062	2034
	Kilrea (29)	2019	2071	2036
	Kircubbin (42)	2018	2063	2032
	Larne (28)	2018	2059	2036
	Limavady (77)	2017	2056	2034

Lisburn (92)	2016	2040	2034
Lisnaskea (67)	2018	2066	2034
Londonderry (71)	2014	(2018) >2070	2032
Magherafelt (79)	2017	2048	2034
Martinstown (21)	2018	2060	2032
Newcastle (Co. Down) (43)	2017	2054	2035
Newry (30)	2015	2033	2025
Newtownstewart (81)	2018	2065	2031
Omagh (82)	2017	2048	2028
Portadown (38)	2015	2035	2027
Rostrevor (41)	2018	2063	2034
Saintfield (97)	2018	2065	2034

### Table notes

note 1 - Option 1 forecast exhaustion includes one additional range for Belfast and Londonderry. The forecast exhaustion for Option 1 without an additional range each for Belfast and Londonderry is provided in brackets.

note 2 - Option 2 forecast exhaustion includes two additional ranges for Belfast. The forecast exhaustion for Option 2 with one additional range for Belfast is provided in brackets.

## Provisional views – our consultation proposals

- 3.36 Having assessed the two options, our initial view is that Option 1 (conservation measures) is likely to be the most appropriate policy approach to ensuring the ongoing supply of number blocks across Northern Ireland. In order to extend supply to the foreseeable future, our proposed policy approach would need to be combined with an additional range for each of Belfast and Londonderry.
- 3.37 Subject to the outcome of this consultation, Option 1 is our preferred approach as we consider that the measures we are proposing under this option:
- would minimise impact on consumers and help preserve location significance by limiting the number of two-digit ranges used to denote an area's local numbers;
  - would ensure more efficient use of existing numbers by more closely matching allocated block size to demand;
  - should be technically feasible for CPs to accommodate. We understand that allocation of smaller number blocks has a generic impact on CPs with older networks. We have sought initial views from CPs likely to be affected on whether the additional digit analysis required to route calls to numbers allocated in smaller blocks in Northern Ireland would be feasible. Preliminary indications are that the impact could be accommodated and that this option is likely to be manageable for them; and
  - would provide sufficient number blocks to meet forecast demand for the foreseeable future, if combined with an additional range each for Belfast and Londonderry.

*Question 1: Do you agree with Ofcom's proposal for the 34 Northern Ireland areas listed in Figure 1 to be determined as Conservation Areas?  
Are there any areas which you think should not have been included in the proposal? If so, please state which areas and for what reasons.*

*Question 2: Do you agree with Ofcom's proposal to assign an additional two-digit range for local numbers in each of Belfast and Londonderry (028 96 for Belfast and 028 72 for Londonderry) to meet greater demand for numbers in those areas? If not, please explain why?*

## Legal tests and duties

- 3.38 Our proposals would require a modification to the Numbering Plan. It is our duty, when proposing a modification to the Numbering Plan, to show how we consider that the proposal complies with our legal tests and duties in the Act (see Annex 1 for further information on the legal framework).
- 3.39 The proposed modifications to the Numbering Plan would give conservation status to all 34 areas in the 028 area code and would assign an additional two-digit range for local numbers in each of Belfast and Londonderry.
- 3.40 We are satisfied that the proposed modifications to provisions of the Numbering Plan meet the tests set out in sections 60(2) and 49(2) of the Act being:

- **objectively justifiable**, it is Ofcom's general duty in administering numbers to ensure their best use. We have identified a scarcity of number blocks to allocate to CPs across Northern Ireland and the proposals are necessary to address this situation. We therefore consider that the proposals would further best use of numbers by ensuring the long-term availability of sufficient number blocks across Northern Ireland to meet CPs' needs, so that they can provide services to consumers, and to further competition, consumer choice and innovation.

In addition, the proposal to introduce conservation measures in the 028 area code would more closely align allocated block size to likely demand, and thereby improve utilisation of geographic numbers across Northern Ireland;

- **not unduly discriminatory**, for the following reasons:
  - i) all CPs eligible to apply for telephone numbers would be subject to the proposed modifications to the Numbering Plan;
  - ii) with respect to conservation measures, CPs would not be unduly constrained by the introduction of 1,000-number blocks. The allocation of multiple blocks of 1,000 numbers would be available for CPs demonstrating a justified demand for more numbers;
  - iii) we anticipate that CPs operating older networks would experience a greater impact from conservation measures. We have sought initial views from CPs likely to be affected on whether the additional digit analysis required to route calls to numbers allocated in smaller blocks in Northern Ireland would be feasible. Preliminary indications are that the impact could be accommodated and conservation measures in Northern Ireland likely to be manageable; and
  - iv) with respect to the introduction of an additional range for local numbers in Belfast and Londonderry, we have recognised the potential impact on CPs

holding allocations of numbers from the new ranges (and not the established range(s)) until those ranges become recognised as 'local' by consumers. However, this impact will reduce over time. We have identified the need to increase the supply of numbers in Belfast and Londonderry and the proposed approach is considered the most appropriate to supplement conservation measures in those areas;

- **proportionate**, it is our duty to ensure that sufficient geographic numbers are available to support competition in fixed-line voice services across the UK for the foreseeable future. The policy principles that guide how we should meet this duty are that:

- i) the numbers consumers want are available when they are needed;
- ii) the numbers consumers currently use are not changed if this is avoidable;
- iii) the meaning which numbers provide to consumers is protected; and
- iv) number allocation processes support competition and innovation.

The proposed modifications to the Numbering Plan would increase the supply of number blocks available for allocation and would contribute to the meeting of our objectives set out above by ensuring that geographic numbers are available to meet CPs' needs across Northern Ireland, that location significance is preserved as far as possible and that number blocks are available to support competition and innovation; and

**transparent**, in that the Notification proposing the modifications to the Numbering Plan, and its effects, are set out in this consultation document.

- 3.41 We consider that we are fulfilling our general duty as to telephone number functions as set out in section 63 of the Act in making the proposed modifications by:

- **securing the best use of appropriate numbers**, the proposal to implement conservation measures in Northern Ireland would ensure that optimal use was made of the currently available geographic numbers for Northern Ireland, thus helping to ensure that appropriate numbers are available for allocation to CPs.

The proposal to add additional ranges for local numbers in Belfast and Londonderry to rectify the scarcity that would remain post implementation of conservation measures would make best use of two unused ranges within the 028 area code (i.e. 028 96 for Belfast and 028 72 for Londonderry); and

- **encouraging efficiency and innovation**, the proposal to implement conservation measures and therefore allocate smaller number blocks would more efficiently meet the numbering requirements of most CPs across Northern Ireland.

The combined proposals of conservation measures and additional ranges for Belfast and Londonderry would ensure that sufficient and appropriate numbers are available to meet CPs' needs across Northern Ireland, thereby supporting competition and innovation.

- 3.42 We consider that our proposal to modify the Numbering Plan is consistent with our general duties in carrying out our functions as set out in section 3 of the Act. In particular, we consider that the proposal would further the interests of citizens in relation to communications matters and consumers in relevant markets by ensuring that the supply of telephone numbers across Northern Ireland is maintained.

- 3.43 In proposing the modifications to the Numbering Plan, we have also considered the Community obligations set out in section 4 of the Act, particularly the requirement to promote the interests of all persons who are citizens of the European Union. Taking measures to conserve geographic numbers benefits citizens as more efficient use is made of the limited resource, thus offsetting the need for more disruptive measures to ensure availability. The combined proposals of conservation measures and adding additional ranges for Belfast and Londonderry would ensure the ongoing supply of numbers to allocate to CPs across Northern Ireland, and thereby promote competition, choice and innovation, which is in the interests of all citizens.

## **Notification of modifications to the Numbering Plan**

- 3.44 The draft notification of the proposed modification to the Numbering Plan is set out in Annex 3 of this consultation document.

*Question 3: Do you have any comments on the proposed modifications to the Numbering Plan set out in Annex 3?*

## Section 4

# Summary of proposals and next steps

- 4.1 We have explained, in the preceding sections of this document, that we need to take action now to ensure the ongoing availability of geographic number blocks to meet CPs' requirements across Northern Ireland. If we do nothing, we risk running out of number blocks to allocate to CPs.
- 4.2 We have looked at options for intervention and our preferred approach, on which we are consulting, is to modify the Numbering Plan in order to:
- introduce conservation measures in all 34 Northern Ireland areas in the 028 area code; and
  - increase the supply of number blocks in Belfast and Londonderry by adding a further two-digit range for local numbers in each area (i.e. 028 96 for Belfast and 028 72 for Londonderry).

## Consultation process and next steps

- 4.3 This consultation closes on 9 May 2014. We are seeking responses to the specific consultation questions set out in the document (see Annex 2) as well as general comments on our proposals.
- 4.4 Details on how to respond to this consultation are provided in Annexes 4 to 6.
- 4.5 Once this consultation has closed, we will take account of all submissions received and then reach a decision.
- 4.6 We plan to publish the statement and the revised Numbering Plan in June 2014.

## Annex 1

# Legal Framework

- A1.1 Ofcom regulates the communications sector under the framework established by the Communications Act 2003 (the “Act”). The Act provides, amongst other things in relation to numbering, for the publication of the Numbering Plan and the setting of General Conditions of Entitlement relating to Telephone Numbers (“Numbering Conditions”). It also sets out statutory procedures governing the modification of the Numbering Plan and the giving of directions under conditions such as the Numbering Conditions.

## The Plan

- A1.2 Section 56(1) of the Act states that:

"It shall be the duty of OFCOM to publish a document (to be known as "the National Telephone Numbering Plan") setting out-

- a) the numbers that they have determined to be available for allocation by them as telephone numbers;
- b) such restrictions as they consider appropriate on the adoption of numbers available for allocation in accordance with the plan; and
- c) such restrictions as they consider appropriate on the other uses to which numbers available for allocation in accordance with the plan may be put."

- A1.3 The Act provides for Ofcom to review and revise the Numbering Plan. Section 56(2) states that:

"It shall be OFCOM's duty –

- a) from time to time to review the National Telephone Numbering Plan; and
- b) to make any modification of that plan that they think fit in consequence of such a review; but this duty must be performed in compliance with the requirements, so far as applicable, of section 60."

- A1.4 Section 60 of the Act provides for the modification of documents referred to in the Numbering Conditions (which includes the Numbering Plan) and explains the procedures to be followed in order to conduct this review. Section 60(2) of the Act provides that:

"OFCOM must not revise or otherwise modify the relevant provisions unless they are satisfied that the revision or modification is –

- a) objectively justifiable in relation to the matters to which it relates;
- b) not such as to discriminate unduly against particular persons or against a particular description of persons;



- c) proportionate to what the modification is intended to achieve; and
- d) in relation to what it is intended to achieve, transparent."

A1.5 Section 60(3) further provides that:

"Before revising or otherwise modifying the relevant provisions, OFCOM must publish a notification –

- a) stating that they are proposing to do so;
- b) specifying the Plan or other document that they are proposing to revise or modify;
- c) setting out the effect of their proposed revisions or modifications;
- d) giving their reasons for making the proposal; and
- e) specifying the period within which representations may be made to OFCOM about their proposal."

## **Ofcom's general duty as to telephone numbering functions**

A1.6 Ofcom has a general duty under section 63(1) of the Act in carrying out its numbering functions:

- "a) to secure that what appears to them to be the best use is made of the numbers that are appropriate for use as telephone numbers; and
- b) to encourage efficiency and innovation for that purpose."

## **General duties of Ofcom**

A1.7 The principal duty of Ofcom to be observed in the carrying out of its functions is set out in section 3(1) of the Act as the duty:

- "a) to further the interests of citizens in relation to communications matters; and
- b) to further the interests of consumers in relevant markets, where appropriate by promoting competition."

A1.8 As part of the fulfilment of these principal duties, it is Ofcom's responsibility to secure the availability throughout the UK of a wide range of numbering arrangements, having regard to the interests of consumers in respect to choice, price awareness, and consumer protection.

## **Duties for the purpose of fulfilling Community obligations**

A1.9 In addition to its general duties as to telephone numbers, when considering revisions to the Numbering Plan, Ofcom must also take into account the six Community requirements in carrying out its functions as set out in section 4 of the Act. These include the requirement to promote competition in the provision of electronic communications networks and services, and the requirement not to

favour one form of network, service or associated facility or one means of providing or making available such network, service or associated facility over another, as well as the requirement to promote the interests of European citizens.

## Annex 2

# Consultation questions

*Question 1: Do you agree with Ofcom's proposal for the 34 Northern Ireland areas listed in Figure 1 to be determined as Conservation Areas?  
Are there any areas which you think should not have been included in the proposal?  
If so, please state which areas and for what reasons.*

*Question 2: Do you agree with Ofcom's proposal to assign an additional two-digit range for local numbers in each of Belfast and Londonderry (028 96 for Belfast and 028 72 for Londonderry) to meet greater demand for numbers in those areas? If not, please explain why?*

*Question 3: Do you have any comments on the proposed modifications to the Numbering Plan in Annex 3?*

### Annex 3

## Notification of proposed modification to the provisions of the Numbering Plan under section 60(3) of the Act

1. Ofcom, in accordance with section 60 of the Act, hereby makes the following proposals for a modification to the provisions of the Numbering Plan.
2. The Condition has effect by reference to provisions of the Numbering Plan.
3. The draft modification to the Numbering Plan is set out in the Schedule to this Notification.
4. The reasons for making the proposals and the effect of the modification are set out in the accompanying document.
5. Ofcom considers that the proposed modification complies with the requirements in section 60(2) of the Act.
6. In making the proposals referred to above Ofcom have considered and acted in accordance with the six Community requirements in section 4 of the Act as well as performed their general duties under section 3 of the Act and their duty as to telephone numbering in section 63 of the Act.
7. Representations may be made to Ofcom about the proposals by **5pm on 9 May 2014**.
8. Copies of the Notification have been made available to the Secretary of State.
9. In this Notification-
  - 'Act' means the Communications Act 2003;
  - 'Condition' means General Condition 17 of the General Conditions of Entitlement set by the Director by way of publication of a Notification on 22 July 2003;
  - 'Ofcom' means the Office of Communications; and
  - 'Numbering Plan' means the National Telephone Numbering Plan published from time to time by Ofcom.

Signed by

A rectangular box containing a handwritten signature in dark ink that reads "M. Gibbs".

Marina Gibbs  
Competition Policy Director

A person authorised by Ofcom under paragraph 18 of the Schedule to the Office of Communications Act 2002.

1 April 2014

## Schedule

The following changes shall be made to Appendix A of the Numbering Plan. The changes are set out in bold.

Geographic Area Code	Geographic Area	Conser- vation Area	100- Number Block Area
<b>028</b>	Ballycastle (20)	Y	
	Martinstown (21)	Y	
	Ballymena (25)	Y	
	Ballymoney (27)	Y	
	Larne (28)	Y	
	Kilrea (29)	Y	
	Newry (30)	Y	
	Armagh (37)	Y	
	Portadown (38)	Y	
	Banbridge (40)	Y	
	Rostrevor (41)	Y	
	Kircubbin (42)	Y	
	Newcastle (Co. Down)(43)	Y	
	Downpatrick (44)	Y	
	Enniskillen (66)	Y	
	Lisnaskea (67)	Y	
	Kesh (68)	Y	
	Coleraine (70)	Y	
	Londonderry (71 <b>and 72)</b>	Y	
	Limavady (77)	Y	
	Magherafelt (79)	Y	
	Carrickmore (80)	Y	
	Newtownstewart (81)	Y	
	Omagh (82)	Y	
	Ballygawley (85)	Y	
	Cookstown (86)	Y	
	Dungannon (87)	Y	
	Fivemiletown (89)	Y	
	Belfast (90, 95 <b>and 96)</b>	Y	
	Bangor (Co. Down)(91)	Y	
	Lisburn (92)	Y	
	Ballyclare (93)	Y	
	Antrim (94)	Y	
	Saintfield (97)	Y	

## Annex 4

# Responding to this consultation

## How to respond

- A4.1 Ofcom invites written views and comments on the issues raised in this document, to be made by **5pm on 9 May 2014**.
- A4.2 Ofcom strongly prefers to receive responses using the online web form at <http://stakeholders.ofcom.org.uk/consultations/ni-tel-nos/howtorespond/form>, as this helps us to process the responses quickly and efficiently. We would also be grateful if you could assist us by completing a response cover sheet (see Annex 6), to indicate whether or not there are confidentiality issues. This response coversheet is incorporated into the online web form questionnaire.
- A4.3 For larger consultation responses - particularly those with supporting charts, tables or other data - please email [matina.papadopoulos@ofcom.org.uk](mailto:matina.papadopoulos@ofcom.org.uk) attaching your response in Microsoft Word format, together with a consultation response coversheet.

Responses may alternatively be posted or faxed to the address below, marked with the title of the consultation.

Stamatia Papadopolou  
4<sup>th</sup> Floor  
Competition Group  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

Fax: 020 7783 4144

- A4.4 Note that we do not need a hard copy in addition to an electronic version. Ofcom will acknowledge receipt of responses if they are submitted using the online web form but not otherwise.
- A4.5 It would be helpful if your response could include direct answers to the questions asked in this document, which are listed together at Annex 2. It would also help if you can explain why you hold your views and how Ofcom's proposals would impact on you.

## Further information

- A4.6 If you want to discuss the issues and questions raised in this consultation, or need advice on the appropriate form of response, please contact Stamatia Papadopolou on 020 7783 4144.

## Confidentiality

- A4.7 We believe it is important for everyone interested in an issue to see the views expressed by consultation respondents. We will therefore usually publish all responses on our website, [www.ofcom.org.uk](http://www.ofcom.org.uk), ideally on receipt. If you think your

response should be kept confidential, can you please specify what part or whether all of your response should be kept confidential, and specify why. Please also place such parts in a separate annex.

- A4.8 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and will try to respect this. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A4.9 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's approach on intellectual property rights is explained further on its website at <http://www.ofcom.org.uk/about/account/disclaimer/>

## Next steps

- A4.10 Following the end of the consultation period, we intend to publish a statement in June 2014.
- A4.11 Please note that you can register to receive free mail Updates alerting you to the publications of relevant Ofcom documents. For more details please see: [http://www.ofcom.org.uk/static/subscribe/select\\_list.htm](http://www.ofcom.org.uk/static/subscribe/select_list.htm)

## Ofcom's consultation processes

- A4.12 Ofcom seeks to ensure that responding to a consultation is easy as possible. For more information please see our consultation principles in Annex 5.
- A4.13 If you have any comments or suggestions on how Ofcom conducts its consultations, please call our consultation helpdesk on 020 7981 3003 or e-mail us at [consult@ofcom.org.uk](mailto:consult@ofcom.org.uk) . We would particularly welcome thoughts on how Ofcom could more effectively seek the views of those groups or individuals, such as small businesses or particular types of residential consumers, who are less likely to give their opinions through a formal consultation.
- A4.14 If you would like to discuss these issues or Ofcom's consultation processes more generally you can alternatively contact Graham Howell, Secretary to the Corporation, who is Ofcom's consultation champion:

Graham Howell  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA

Tel: 020 7981 3601

Email [Graham.Howell@ofcom.org.uk](mailto:Graham.Howell@ofcom.org.uk)

## Annex 5

# Ofcom's consultation principles

A5.1 Ofcom has published the following seven principles that it will follow for each public written consultation:

## Before the consultation

A5.2 Where possible, we will hold informal talks with people and organisations before announcing a big consultation to find out whether we are thinking in the right direction. If we do not have enough time to do this, we will hold an open meeting to explain our proposals shortly after announcing the consultation.

## During the consultation

A5.3 We will be clear about who we are consulting, why, on what questions and for how long.

A5.4 We will make the consultation document as short and simple as possible with a summary of no more than two pages. We will try to make it as easy as possible to give us a written response. If the consultation is complicated, we may provide a shortened Plain English Guide for smaller organisations or individuals who would otherwise not be able to spare the time to share their views.

A5.5 We will consult for up to 10 weeks depending on the potential impact of our proposals.<sup>10</sup>

A5.6 A person within Ofcom will be in charge of making sure we follow our own guidelines and reach out to the largest number of people and organisations interested in the outcome of our decisions. Ofcom's 'Consultation Champion' will also be the main person to contact with views on the way we run our consultations.

A5.7 If we are not able to follow one of these principles, we will explain why.

## After the consultation

A5.8 We think it is important for everyone interested in an issue to see the views of others during a consultation. We would usually publish all the responses we have received on our website. In our statement, we will give reasons for our decisions and will give an account of how the views of those concerned helped shape those decisions.

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<sup>10</sup> We are consulting for six weeks. We consider this an appropriate period for consultation as it is more than one month following the publication of the notification of the change, which is a requirement in the Act when we consult on amendments to General Conditions or the Numbering Plan. We have also decided not to extend the consultation period to 10 weeks in accordance with [Ofcom's consultation guidelines](#) because the proposals are the continued implementation of existing policy for managing demand for geographic numbers.



## Annex 6

# Consultation response cover sheet

- A6.1 In the interests of transparency and good regulatory practice, we will publish all consultation responses in full on our website, [www.ofcom.org.uk](http://www.ofcom.org.uk).
- A6.2 We have produced a coversheet for responses (see below) and would be very grateful if you could send one with your response (this is incorporated into the online web form if you respond in this way). This will speed up our processing of responses, and help to maintain confidentiality where appropriate.
- A6.3 The quality of consultation can be enhanced by publishing responses before the consultation period closes. In particular, this can help those individuals and organisations with limited resources or familiarity with the issues to respond in a more informed way. Therefore Ofcom would encourage respondents to complete their coversheet in a way that allows Ofcom to publish their responses upon receipt, rather than waiting until the consultation period has ended.
- A6.4 We strongly prefer to receive responses via the online web form which incorporates the coversheet. If you are responding via email, post or fax you can download an electronic copy of this coversheet in Word or RTF format from the 'Consultations' section of our website at [www.ofcom.org.uk/consult/](http://www.ofcom.org.uk/consult/).
- A6.5 Please put any parts of your response you consider should be kept confidential in a separate annex to your response and include your reasons why this part of your response should not be published. This can include information such as your personal background and experience. If you want your name, address, other contact details, or job title to remain confidential, please provide them in your cover sheet only, so that we don't have to edit your response.

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

Consultation title: Managing Northern Ireland telephone numbers

To (Ofcom contact): Stamatia Papadopoulou

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

### 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

Signed (if hard copy)