

Consultation response form

Please complete this form in full and return to futureofnumberingteam@ofcom.org.uk or:

Future of Numbering Team
Ofcom
125 Princes Street
Edinburgh, EH2 4AD

Consultation title	Future of telephone numbers
Full name	
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	TalkTalk
Email address	

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Your name
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question	Your response
<p>Question 2.1: We have set out developments in voice telephone services that are important in shaping our review of the future use of numbers to promote consumer confidence. Do you agree that these are the key considerations? Do you have any comments on our analysis of these developments? Are there any other developments or considerations that should be part of shaping this review, and if so, in what way?</p>	<p>Confidential? – N</p> <p>We believe that the policy principles that Ofcom identified in 2006 remain valid and have provided a solid basis for Ofcom’s decisions regarding the use of numbers over the years. A high level of consumer protection should be at the forefront of Ofcom’s policy making but we would caution against making decisions that restrict competition and consumer choice. The preference should always be to find ways to improve consumer awareness and protection whilst safeguarding the underlying competitive structure of markets.</p>
<p>Question 3.1: What are your thoughts on the ability to dial local numbers from a landline without the area code? Do you think the local dialling facility has value?</p>	<p>Confidential? – N</p> <p>We believe that the local dialling facility is valued by customers who may not even be aware of it being useful when they use it. There is a concern that removing the facility without good reason backed up by solid evidence may cause unnecessary consumer confusion and ultimately harm.</p>
<p>Question 3.2: Do you think local dialling should be closed on an area by area basis as required to increase number supply or across the whole of the UK at the same time? Why do you think this?</p>	<p>Confidential? – N</p> <p>We would suggest that local dialling should be closed on an area by area basis in line with current Ofcom practice. There is no apparent evidence for extending this to the whole of the UK at the same time. In the areas where local dialling has been closed, this has required an extensive customer information campaign to ensure a high level of awareness and we would be concerned about the practical and cost implications of doing the same on a national level.</p>

<p>Question 3.3: Do you have any views on allowing telecoms providers to make individual decisions on whether to provide customers with the ability to dial local numbers from a landline without the area code?</p>	<p>Confidential? – N</p> <p>We believe this would risk causing unnecessary confusion as customers switch providers who may adopt different practices.</p>
<p>Question 3.4: For telecoms providers, what are your thoughts on the ability to implement the closing of local dialling in all UK area codes simultaneously?</p>	<p>Confidential? – N</p> <p>We would refer to our response to Question 3.2 above.</p>
<p>Question 3.5: For telecoms providers, what are your views on the technical feasibility of providing local dialling to customers when offering an IP-based voice service?</p>	<p>Confidential? – N</p> <p>TalkTalk has been offering an IP-based voice service for over 13 years including local dialling to customers. We do not believe there are any technical feasibility issues arising in this context.</p>
<p>Question 3.6: What do you consider are the important factors about geographic numbers? For example, is it the information they provide about the caller/called party? Is it familiarity, trust or confidence in call cost?</p>	<p>Confidential? – N</p> <p>We believe there is a large overall sense of familiarity, trust and confidence in the cost of calling geographic numbers among UK consumers (and perhaps in particular older customers). We would caution against making any overall changes without solid quantitative evidence of consumer support.</p>
<p>Question 3.7: What are your thoughts on retaining area codes in geographic numbers? Do you think location significance in geographic numbers has value and should be preserved? If so, why? How might your view change over time?</p>	<p>Confidential? – N</p> <p>We believe that that area codes in geographic numbers remain important for many customers who place significant value in the location signified by the codes. Area codes should therefore be preserved in the absence of solid quantitative evidence of consumer support for abolishing them. However, as the UK moves towards all-IP telephony and the role of the local exchange diminishes, it would be desirable for Ofcom to publish a unified definition of the area code locations (potentially by post</p>

	code) which can be consistently applied by all operators.
<p>Question 4.1: What are your thoughts about 084 and 087 numbers? What are the benefits and/or disadvantages of contacting an organisation by calling an 084 or 087 number? Can you tell us of any experience you've had calling these numbers? Have you expressly chosen not to call a service that uses these numbers? If so, what led to that decision and how did you choose to make contact instead (if you did)?</p>	<p>Confidential? – N</p> <p>We believe that 084 and 087 numbers continue to play an important role in the competitive structure of the non-geographic calls market. It would be premature to make significant changes so relatively soon after the introduction of the disaggregated retail charging system in 2015. We are concerned that the evidence from the consumer research carried out by Ofcom fails to recognise two important aspects of existing regulation.</p> <p>First, we would question whether the perceived call cost (or uncertainty around call cost) is a result of poor enforcement of the very clear marketing rules that Ofcom introduced in 2015 to ensure a high level of consumer awareness of the respective role of the service and access charges.</p> <p>Second and more importantly, we are concerned that consumer concerns may be the result of the fact that access charges are uncapped which has resulted, we would suggest, in excessive access charges being levied particularly by mobile operators.</p> <p>We do not believe Ofcom has yet completed its review of the non-geographic calls market that was intended to analyse the impact of the changes in 2015. It was originally envisaged that such a review might include an assessment of whether there should be a cap on the access charge and whether the price publication requirements for the access and service charges were effective (see para 5.56 of Ofcom's policy statement in April 2013).</p> <p>We do not think the call cost review initiated by Ofcom in May 2017 was intended to be the full review envisaged or</p>

	<p>contemplated in April 2013.</p> <p>We would therefore suggest that the most appropriate way forward would be to complete a complete review which could include an overall assessment of the role played by 084/087 numbers rather than seeking to make radical policy changes based on the limited qualitative consumer research carried out by Ofcom. For instance, it is possible that a simplification of the current 084/087 service charge structure (e.g. a reduction in the number charge points) may be a more suitable response to perceived consumer concerns. A wider review of the market would be able to give more informed answers in this regard.</p>
<p>Question 4.2: We are interested in hearing from people who use 084 or 087 numbers as a contact telephone number. If you use one of these types of numbers as a means of contacting your service, why did you choose to do so? What do you think about using these numbers in the future?</p>	<p>Confidential? – N</p> <p>Not applicable.</p>
<p>Question 4.3: For telecoms providers, we are interested in hearing from providers that offer services on 084 and 087 numbers to their customers. If you do, can you provide some examples of use cases? What benefits do you offer to organisations in using 084 and 087 numbers rather than other numbering options? For originating providers, do you have any customer experience of attitudes towards and views on calling 084 and 087 numbers that you can share?</p>	<p>Confidential? – N</p> <p>Please refer to our response to Question 4.1 above.</p>
<p>Question 4.4: Are there changes to 084 and 087 number ranges that you think Ofcom should consider proposing to address the concerns highlighted in the research summarised in paragraphs 4.17 to 4.26?</p>	<p>Confidential? – N</p> <p>Please refer to our response to Question 4.1 above.</p>

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