Consultation: Future of telephone numbers-Second consultation.

Twilio's Response to the review by Ofcom

2 July 2021

1. About Twilio

1.1 As a leading global Communications Platform as a Service (**CPaaS**) provider, Twilio provides services to more than 235,000 enterprises globally and powers more than 1 trillion interactions between them and their customers every year.

1.2 Twilio's software allows customers to communicate with their customers over voice, SMS, messaging, or email thanks to the communications capacity that companies have added into applications across a range of industries, from financial services and retail to healthcare and non-profits.

1.3 For instance, Twilio powers the communications for New York City's contact tracing initiative. The services enable city authorities to communicate with COVID-19 patients, educate them on the virus, and identify their close contacts through self-reporting. The platform also provides messaging-based alerts using Twilio Voice, SMS, email or WhatsApp that prompt patients to fill out secure surveys on their symptoms.

1.4 In the United Kingdom Twilio powers [redacted] contact centre and [redacted] IVR and phone conferencing which allows for the connection of adults with volunteers on weekly phone calls.

1.5 Many of Twilio's customers are also small and medium-sized enterprises and Twilio's non-profit arm, Twilio.org, supports charitable organizations to deliver their communications needs.

2. Executive Summary

2.1 Twilio welcomes the opportunity to provide feedback on Ofcom's second consultation on the Future of Telephone Numbers.

2.2 Phone numbers are key to our customers and the Communications Platform as a Service we provide them. Our customers rely on phone numbers to identify themselves to the persons they call and message. Parties receiving calls and messages want to know that the person that is calling and messaging them are who they say they are. Our customers view phone numbers as an important identifier that supports their businesses and brands. Twilio is acutely aware that in order for our customers' businesses and brands to flourish trust in phone numbers is required by the entire ecosystem - businesses that make calls and send messages, persons that receive calls and messages and electronic communications services providers that facilitate these exchanges.

2.3   The Numbering Plan is the essential document that lays out the rules and regulations on the usage and applications for phone numbers.

2.4   Twilio welcomes the fact that Ofcom is conducting this review and would encourage Ofcom to keep issues such as mobile/fixed convergence and the role of mobile numbers and whether they can only be used for "mobility" use cases under regular review in order to take into consideration, amongst other things, changes to industry process, new products and market developments. This regular review is critical to ensuring that the Numbering Plan supports innovation in the United Kingdom. Twilio notes for example that Sweden is currently consulting on making changes to their numbering plan that would remove area codes and would remove the distinction between mobile and fixed numbers. Twilio notes that Swedish Post and Telecommunications Authority (**PTS**) indicates that such changes would, if implemented, offer operators and others even better opportunities to develop new attractive services for users.

2.5   In particular, Twilio notes that from a customer perspective the distinction between the uses of fixed and mobile numbers is dissipating, particularly for younger consumers. It notes that Ofcom itself in the consultation notes that " More and more consumers use mobile phones to make calls from home in the way they might have done from a fixed line previously" Twilio notes that Ofcom is also embarking on a mobile strategy review and Twilio would wish to engage with Ofcom on that in terms of the role of mobile numbers and using those in a broader way.

2.6   In advance of that engagement, Twilio therefore welcomes the opportunity to make comments on the Consultation.

2.7   Please do not hesitate to refer any questions or remarks that may arise as a result of our comments to:

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3.   Twilio's Comments

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> **Question 3.1 Do you agree with our proposal to remove the obligation for telecoms providers to provide the local dialling facility?**

3.1   Twilio supports Ofcom's proposal to remove the requirement for local dialling. Twilio agrees that the future of services is IP based and that removing the requirement for local dialling will help to facilitate innovative voice services and greater competition.

> **Question 3.2 Do you agree with our proposal to retain the provisions in the Numbering Plan which (i) allocate location significance to area codes and (ii) allow phone users to request out of area use of geographic numbers.**

3.3   Twilio supports the current flexibility within the United Kingdom to be able to allocate customers out of area use of geographic numbers. This is important to customers and should be retained. Given that the location significance of geographical numbers is only likely to decrease over time, Twilio believes that Ofcom should continue to monitor this issue and be prepared to move quickly to a more flexible system. Twilio notes that Sweden, France, Switzerland, Norway and Australia have moved away or are in the process of moving away from the requirement to strictly link Geographic Numbers within designated geographic areas due to amongst other things the evolution of new products and technologies. This trend is only likely to continue to grow given the growing usage of mobile phones, falling penetration of landlines and the move toward IP networks.

> **Question 3.3 Do you agree with our proposal to modify the Numbering Plan to prohibit direct and indirect revenue sharing with the calling party for calls to all geographic and non-geographic numbers?**

3.4   Twilio agrees with Ofcom's proposal to modify the Numbering Plan to prohibit direct and indirect revenue sharing with the calling party for calls to all geographic and non geographic numbers.

3.5   Twilio supports Ofcom's view that revenue sharing schemes that share revenue with a calling party encourages calling that has no purpose apart from to generate revenue for the terminating party, a fraction of which they then share with the calling party. Not only is such calling an inefficient use of resources, when it leads to call ranges and numbers being excluded from call packages it also causes additional cost for third parties.