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Samir Prakash  
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**NON-CONFIDENTIAL**

8 January 2013

Dear Samir

**Ofcom's consultation regarding its proposal to withdraw 0500 Freephone telephone numbers published 23 October 2012 (the "Consultation")**

Hutchison 3G UK Limited ("Three") welcomes the opportunity to respond to Ofcom's Consultation. As a mobile network operator, Three has an interest in the outcome of this Consultation. Whilst Three does not hold any 0500 numbers or make use of them as a service provider, we do originate calls made by our customers to these numbers.

Three supports Ofcom's proposal to withdraw the 0500 number range. We agree that such a withdrawal is in line with Ofcom's efforts as part of the wider NCGS review to simplify non-geographic numbers and improve consumer confidence in these ranges.

In our view, the following factors contribute to the 0500 number range being increasingly redundant and support Ofcom's preferred option, namely withdrawal of the 0500 range:

- the relatively small and declining volumes of traffic to 0500 numbers;
- the fact that no new 0500 numbers have been allocated since 2001; and
- the limited number of SPs who continue to actively use the 0500 numbers allocated to them.

Three's own wholesale call origination data aptly illustrates the very limited use of 05xx ranges that we see by our customers. For example, the table below shows Three's monthly outbound minutes to 05xx number ranges, compared to 07xx ranges and 08xx ranges, for the last three calendar months.

Outbound Minutes	Oct-12	Nov-12	Dec-12
05xx	[REDACTED]	[REDACTED]	[REDACTED]
07xx	[REDACTED]	[REDACTED]	[REDACTED]
08xx	[REDACTED]	[REDACTED]	[REDACTED]

Source: Three's wholesale data [CONFIDENTIAL]

As Three is not a service provider using 0500 number ranges, we are not in position to comment in detail on the practical considerations for withdrawal of the 0500 number ranges. However, given that 05xx calls constitute such a small percentage of overall originating traffic, we urge Ofcom to seek proportionate, cost-efficient measures to support withdrawal of the 0500 range.

With regard to communicating any changes to consumers, we note that Ofcom has proposed using pre call announcements (PCAs) as a possible means of driving awareness of the proposed change (paragraph 6.16). Whilst Three can support a generic PCA for Freephone numbers, we would be unable to support bespoke/individual PCAs without significant investment (in terms of time, money and resource). Such a bespoke solution would be disproportionate to the problem Ofcom is trying to address. Therefore, we are strongly of the view that the onus should fall on the service provider, rather than the originating communications provider, to communicate details of any new number to which the service will migrate following withdrawal of the current 0500 number.

We also note that Ofcom has asked for views as to whether an 18 month or 24 month implementation/transition period is preferable. Again, given that we do not act as a service provider, we do not have strong views either way, however, we do generally support Ofcom's efforts to minimise costs and disruption to industry as a whole.

We note that Ofcom's proposals in the Consultation are closely aligned with Ofcom's wider review of non-geographic numbers. Therefore, we would also ask that our comments in this response be read in conjunction with our fuller response to Ofcom's April 2012 NCGS consultation.

We would of course be happy to discuss any related matters further, if that would be of assistance.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'X Mooyaart', is positioned above the printed name and title.

Xavier Mooyaart  
Head of Legal – Regulatory and Competition