

RESPONSE TO OFCOM'S CONSULTATION ON TELEPHONE NUMBERING - PROPOSED MODIFICATIONS TO THE NATIONAL TELEPHONE NUMBERING PLAN, GC 17 & TELEPHONE NUMBER APPLICATIONS FORMS WITHIN EXISTING NUMBERING POLICY

19.09.12

Cable&Wireless Worldwide welcomes the opportunity to respond to Ofcom's consultation proposing modifications to the Numbering Plan. We acknowledge that the proposed changes are an integral part of the preparations necessary to introduce other linked Ofcom proposals and in particular prepare the ground for the implementation of the "unbundled tariff" in the Non-Geographic Calls Services (NGCS) market.

Ofcom has presented its proposals in four sections: i) proposed modifications to General Condition 17; ii) proposed modifications to the Numbering Plan iii) proposed modifications to the Numbering Application Forms and iv) legal tests. Cable&Wireless Worldwide is satisfied that all of the proposals meet the legal tests that have been applied and is supportive of all of the changes.

We note that the modifications to GC17 are part structural with Annex 1 being moved into the Numbering Plan and part simplification and removal of regulatory burden with the removal of the requirement for CPs to maintain their own numbering plan. Cable&Wireless Worldwide welcomes all of the changes in this section.

Similarly we support the changes in relation to the Numbering Plan itself. The proposed changes to the definition of 03 numbers will serve to remove some prevailing confusion between CPs in the wholesale market as to the nature of the numbers. We note that the current "UK-wide Numbers" was poorly understood or used amongst industry, let alone amongst consumers.

We are also supportive of the proposed changes to the Numbering Application Forms.