

**Response to *Geographic telephone numbers: safeguarding the future of geographic numbers* consultation published 20 March 2012**

**Submitted by: Goodman, Mr C**

**Question 1i: Do you have any comments on i) our proposal to close local dialling in the Bournemouth 01202 area code on 1 November 2012:**

Some years ago there was a similar problem in several areas of the UK. The then solution was the introduction of 3 digit area codes 02x leading to 8 digit subscriber numbers. I appreciate that 01202 is not conducive to this but would suggest that a new 3 digit area code would suffice and be radically less complex.

**Question 1ii: our view as to how the proposed modification to the Numbering Plan in relation to closing local dialling in the 01202 area code on 1 November 2012 meets the relevant legal tests in section 60(2) of the Act or:**

I have no question on the legality of your proposal

**Question 1iii: the proposed modification to the Numbering Plan in relation to closing local dialling in the 01202 area code (set out in Annex 7)?:**

Unnecessarily complex

**Question 2i: Do you have any comments on i) our view as to how the proposed pilot scheme meets the relevant legal tests in section 47(2) of the Act and:**

I feel that the proposed modification is disproportionate for what it aims to achieve.

**Question 2ii: the proposed amendments to GC17 to implement the pilot scheme (set out in Annex 8)?:**

While it is always acceptable to attempt improvements and to prove these by use of pilot schemes, it is not acceptable to introduce any new charge which will be recovered from the consumer.

**Question 3i: Do you have any comments on i) our proposals to make 100 blocks of 100-numbers available for allocation in the 11 five-digit area codes:**

It is apparent to me that too much administrative control is placed on number allocation. CPs should be able to obtain a number block allocation within 24 hours at no cost. It must be remembered that the telephone system (inherited from the Post Office Telephones) is a national asset and not Ofcom property to use for gain.

**Question 3ii: our submission of how the proposed modification to the Numbering Plan in relation to 100-number blocks meets the relevant legal tests in section 60(2) of the Act or:**

I would challenge the proposed modification on the grounds that it is not objectively justifiable in what it wishes to achieve and that it is disproportionate in itself.

**Question 3iii: the proposed modification to the Numbering Plan in relation to 100-number blocks (set out in Annex 7)?:**

**Question 4: Do you agree with our proposed approach for ported and WLR numbers? If not, please explain why you disagree.:**

**Question 5: Do you have any comments on the proposed administrative arrangements for number charging in the pilot scheme as set out in paragraph A4.37?:**

I robustly disagree with Ofcom charging for numbers in any way whatsoever and can only consider that this is a form of backdoor taxation. If a simulation of number charging is implemented as a virtual procedure without any actual charge being made then it would not need approval under the Act, the end of year results would be available for analysis without the need to impose a charge on the user public.