**Response to *Geographic telephone numbers: safeguarding the future of geographic numbers* Statement and further consultation published 7 September 2011**

**Submitted by: Name Withheld 1**

## Additional comments:

The financial burden on the smaller telecoms provider will be entirely disproportionate, as there do not appear to be any plans to allow allocations to be made in small i.e. sub 1000 number blocks, except in the limited areas listed in Q1 below.

Effectively smaller providers are being held over a barrel: pay £3k a year (assuming 1k allocations in each of the affected areas) or lose your ranges. What do you do if you only have a few customers with numbers in those ranges?

Instead of promoting competition in the marketplace, these proposals will serve only to raise the barriers of entry to the market to protect the incumbent big players, for whom payments for ranges are a relatively trivial cost of doing business.

## Question 1:Do you agree with our proposal to allocate up to 10,000 numbers in blocks of 100 numbers (i.e. 100 x 100-number blocks) in the following 11 five-digit area codes? Appleby (017683) Gosforth (019467) Grange over Sands (015395) Hawkshead (015394) Hornby (015242) Keswick (017687) Langholm (013873) Pooley Bridge (017684) Raughton Head (016974) Sedbergh (015396) and Wigton (016973):

Yes, smaller allocations are hugely beneficial to smaller providers where a (for example) 1000 number range could last many years or decades.

## Question 2:(for CPs):Would it be feasible for your network to handle up to 10,000 numbers allocated in blocks of 100 numbers in the 11 five-digit area codes listed in Question 1:

Yes

## Question 3:(for CPs): What are your predicted costs and timescale requirements for implementing the necessary changes in your network switches to support routing to blocks of 100 numbers in the 11 five-digit area codes listed in Question 1:

No changes necessary

## Question 4:Do you agree that the pilot for geographic number charges should be introduced six months after the date the final statement is published? If not, please state your preferred implementation period and reasons.:

If charging is inevitable, it is certainly preferable it not be immediate.

However, my concern is that this is being applied to blocks already assigned retroactively. This makes it impossible for providers to "hand back" blocks they've already allocated numbers to end users from.

## Question 5:Do you agree that we should introduce charges in a pilot scheme initially? If not, please state your preferred approach and reasons.:

If charging is inevitable, it is certainly preferable to only charge for numbers in areas where demand is tight.

However, if, at the end of the pilot period, the intention is to charge for all number blocks, CPs will be looking at a minimum charge of £61,000 per annum (assuming 1k blocks in each geographic area). This does not take into account areas where only 10k blocks are available (London, Birmingham, Manchester, etc.). Charges such as these would inevitably make it impossible for some smaller CPs (ourselves included) to continue in business, yet returning the ranges isn't an option, as allocations to end users have already been made from them.

## Question 6:Do you agree that the revised pilot scheme should capture around 30 area codes with the fewest number blocks remaining available to allocate? If not, please state your preferred threshold and reasons.:

I note from the summary document that based on Ofcom's own criteria, only 8 area codes would fit the pilot charging scheme.

So either a) the criteria proposed by Ofcom in November 2010 was sensible and the audit was successful, in which case, charging would appear to be unnecessary as ranges have been returned; or b) Ofcom should justify why the criteria originally proposed by themselves has been changed.

What is of the greatest concern is for what period this pilot will last for, and what the proposed outcomes at the end of it will be. As I've laid out in the additional comments section above, the cost to the smaller CP is utterly disproportionate - not through any fault of their own - if CPs could request smaller allocations, we would.

## Question 7:(for CPs): Are you able to provide an estimate of the administrative costs of implementing number charging? Which aspects generate the most significant administrative costs for CPs:

Administrative costs will be relatively trivial: one assumes Ofcom will simply invoice us per annum for our allocations.

The issue with numbers ported out is one of concern, however, and Ofcom will need to mandate some sort of 'cost recovery' structure to enforce payments to the losing provider in the event of porting.

## Question 8:Which option for dealing with number charges for ported and WLR numbers do you prefer? Please set out reasons for your preference. :

Ofcom might consider operating a 'clearinghouse' for ported numbers, so that instead of the losing CP having to keep track of the gaining CP for every port out (and raise individual invoices to each CP, which could, over time, number well into the hundreds), Ofcom keeps records of which numbers have been ported and to which CP. Ofcom would then be able to instigate cost recovery from gaining CPs on behalf of losing CPs.

This would be extremely useful for other purposes as well: for example, when an end user wishes to port a number, but the porting path is convoluted due to subsequent ports etc.

## Question 9:Do you have any comments on Ofcom?s intended billing assumptions for the proposed pilot charging scheme for geographic numbers? i.e. that Ofcom will bill CPs annually, CPs will be billed in arrears, and charges will accrue for each number block in chargeable area codes on a daily basis):

Annual billing seems sensible to reduce the administrative burden on CPs. Billing in arrears is an inevitability, as it will be necessary to take into account numbers ported in/out as discussed in Q8 above.

## Question 10:Do you have any views on the appropriate Charging Year and billing cycle for the pilot charging scheme for geographic numbers:

Calendar year seems a simple and effective methodology.