Response to *Geographic telephone numbers: safeguarding the future of geographic numbers*

Submitted by: Loho Ltd

Question 1: Do you have any comments on the objectives and approach to this review of geographic number management? Do you agree with the policy principles that we consider should inform the review?

Question 2: Do you agree that we should not consider further at this stage options that would change existing numbers?

Yes

Question 3: Do you agree that local solutions are appropriate based on our current forecasts of anticipated requirement of more numbers?:

Local solutions are a stop-gap measure, we believe that while they may be required in the short term, Ofcom should be working in the medium term to resolve the root causes of the issue, as identified in our answer to Question 16.

Question 4: Do you agree with our assessment of the options for providing new supplies of numbers in four-digit code areas, as presented in Section 4 and in Annex 3:

We believe that option 1 may have a significant impact on those who are likely to be least able to adapt to the change, such as elderly persons who have been able to dial a local number for many many years, and are also less likely to see any advertising campaigns etc to learn about the changes.

We do not agree with your assessment in 4.39 that option 2 may not be preferable, as in the majority of cases vulnerable persons will likely not need to make calls to 'newer' numbers on a regular basis, thus will not be affected by such a change.

Question 5: Do you agree that closing local dialling followed, if necessary, by the introduction of an overlay code should be the preferred option for providing new supplies of numbers in four-digit areas that may need them? Please give reasons for your answers, and provide evidence where possible.:

No, following our answer to question 4 we believe that introducing an overlay code first should be the preferred option. While many people do express valid concerns about the importance of a geographic number, similar issues have occurred in the past (the combination of the old 0171 and 0181 codes in to 020 for example - while some confusion still exists with customers assuming there are still multiple codes e.g. 0207 and 0208, in general this confusion is diminishing), and people have adapted to them.

Question 6: Are there any other number supply measures that we should consider for four-digit areas?:

Please see our answer to question 16

Question 7: Do you agree that we should merge five-digit codes with four-digit codes to create new supplies in five-digit code areas that need them? Do you have any comment on our assessment of the impacts of the options we have considered? If so, please provide relevant evidence where possible.:

We believe the impact on vulnerable persons of such a change would be similar to the impact of removing local dialling in a 4-digit code area, as such our answer to Question 4 is appropriate here.

Question 8: Are there any other numbers supply measures that we should consider for five-digit areas?:

Please see our answer to question 16

Question 9: Do you agree with our considerations and preliminary conclusions on how new supplies of numbers should be provided where they are required?:

As a short-term solution, some of the options proposed are acceptable (see our answers to previous questions for specific comments), however we believe this is just a stop-gap solution and medium term solutions should be sought in preference.

Question 10: Do you have any comments on how the implementation of number supply measures should be planned?:

No

Question 11: How long do you consider that CPs would need to plan the implementation of the preferred options for four- and five-digit areas?:

Unknown - as a newer VoIP CP we are able to make changes very rapidly, as such the bottleneck is likely to be the operators with legacy networks.

Question 12: If you are a CP, what costs do you consider that your company would incur if the preferred options for four- and five-digit areas were implemented?:

We would estimate implementing the changes to dialling rules and billing engines would take approximately 1-2 day's effort.

Question 13: Do you think that we should reserve a limited amount of numbers for allocation in blocks of 100 numbers in area codes where it is feasible to do so?:

Where feasible this would be another suitable stop-gap measure.

Question 14: What criteria, if any, in addition to a ?first-come first-served? basis should be used for allocating such blocks of 100 numbers to providers?:

We believe no additional criteria should be added - this would create an unfair competitive advantage to CPs who were allocated number blocks prior to the criteria change.

Question 15: Should the geographic extent of such allocations be limited to the seven areas likely to run out of numbers for allocation before 2015? (i.e. Blackpool (01253), Bournemouth (01202), Bradford (01274), Brighton (01273), Derby (01332), Langholm (013873) and Middlesbrough (01642)):

Unknown

Question 16: Do you consider that there are any technical obstacles currently to the effective sharing of number blocks by CPs and to sub-allocation? How could we usefully address those obstacles?:

Your proposals for the areas with limited numbers remaining would require CPs with legacy networks to update their equipment to require area codes when dialling local numbers, would it not be better to require them to update their equipment so that it does not require minimum 1,000 number blocks. You say in 2.12 that you do not believe this would be economically justifiable, however, these limitations are hurting competition in the market as in addition to the number utilisation problems, it also forces use of the onward routing number porting method - something now held up in the rest of the world as an example of how not to do porting. If Ofcom were to require the CPs with legacy networks to update their equipment to handle allocations smaller than 1,000 numbers, then this would solve the two issues simultaneously. There is even an option to keep aspects of the current system by using the Query On Release (QoR) portability scheme - at this point existing CPs can keep their 1,000 number blocks in principal, but any numbers they are not using can be returned to a central database that Ofcom can then release to CPs who need smaller volumes of numbers. This option fits with the general objective of your review stated in 2.17, and also avoids any disruption to citizens and consumers that you say is inevitable in 2.18.

Question 17: What are your views on the concept, practicalities and implications of introducing a reservation system for geographic numbers?:

A reservation system would be a sensible step to take to prevent wastage of numbers.

Question 18: Do you have any comments on our proposed scope of additional audits?:

Your proposed scope appears sensible

Question 19: Do you agree with the high level objectives proposed for the charging regime?:

Yes

Question 20: Do you envisage that sub-allocation would increase if number charging is introduced? Do you have any comments on our analysis of barriers to successful use of sub-allocation?:

No, we do not believe that charging will increase sub-allocation. In general we agree with your analysis, however in 6.44 you say "there is little incentive to obtain numbers from another CP in a sub-allocation arrangement when they can be obtained from Ofcom for free" - we disagree with this statement as for newer CPs there are a number of incentives to use a sub-allocation arrangement, such as:
* No need to fill out Ofcom paperwork
* No need to deal with other CPs to get a new number block routed - thus leading to a significantly shorter lead time

Question 21: Do you agree with our view on how charges could be set? If not, please propose an alternative approach with supporting evidence.:

Your view on how charges should be set does not take in to account the size of the CP - for a charge to be effective in encouraging responsible usage of numbers it needs to be meaningful to each CP - a small charge to a very large provider would be considered 'chump change' and just paid without even considering changing any methods etc, whereas a small charge to a new entrant to the market would potentially have a significant effect.

Also, it seems broadly unfair to charge CPs who are forced to take a minimum 1,000 number block for all 1,000 numbers due to those CPs with legacy networks having technical restrictions - perhaps an alternative approach would be to apply an ongoing (significant) charge to CPs with legacy networks to encourage them to upgrade?

Question 22: Do you agree with our preferred option for charging for geographic numbers? (i.e. Option 2 Pilot scheme: Charge a flat rate of 10p per number per annum in area codes with 100 or fewer blocks of 1,000 numbers (no charge for other areas). If not, please state your reasoned preference.:

No - please see our answer to question 21

Question 23: Do you agree that the threshold for including an area code within the pilot scheme should be 100 or fewer 1,000-number blocks remaining to allocate? If not, please state your preferred threshold and reasons.:

Please see our answer to question 21 - we do not believe that charging on the basis proposed is the correct solution.

Question 24: Do you agree with the proposed level of the charge (i.e. 10p per number per annum)?:

No, as stated in our answer to question 21 while this figure may be meaningful to newer, smaller CPs - to the larger CPs who have the majority of the number blocks it is 'chump change', and will just be paid without even considering more efficient use of the number space.

Question 25: Are there any other incremental administrative costs likely to be incurred by CPs in relation to number charging? Can you estimate the magnitude of any such costs? :

We cannot imagine any such costs - as Ofcom knows which blocks a CP is allocated surely it would just issue an invoice once a year, which the CP pays - if any CP finds paying an invoice a significant administrative cost then we would be surprised.

Question 26: Do you agree that we should not pursue a policy of charging for golden geographic numbers? If you do not agree, please provide your reasoning.:

We agree.

Question 27: Do you have any views on the principles for cost recovery? Do you have any views on the cost recovery mechanism? Do you agree with the preferred approach?:

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