

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

Submitted by: Name Withheld 1

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, unless part of a national change, e.g. moving to 12-digit numbers.

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

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:

As stated, Option 3 (overlay with asymmetric local dialling open) presented in para 4.25 is counter-intuitive, and would introduce a bias against use of the new codes.

I believe the disadvantages of option 2 in para 4.36 have been exaggerated, and all will eventually apply to option 1 anyway; earlier introduction of overlay will minimise overall disruption in the longer term.

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. Local dialling is a useful feature. Closing it would provide merely a limited capacity increase, and would require service users to re-programme existing local numbers stored on phones without the area code.

Overlay is a reasonable option for immediate adoption, with option 2 presented in para 4.25 being strongly preferable.

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

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.:

Closing of five-digit codes and merging them into four-digit areas seems logical, and would promote a similar standard of service nationally.

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

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

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

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?:

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?:

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?:

Yes, this should be considered.

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?:

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)):

No.

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?:

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

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

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?:

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

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.:

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.:

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

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? :

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.:

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?: