

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

Submitted by: NumberGroup.com

Additional comments:

We strongly disagree with your planned changes that would force our business to cease offering free 01/02 numbering. We are the UK's only supplier of free telephone numbers, without any set up, connection or rental fee's. How can we go back to our existing customers and say sorry we now have to charge you ? Larger networks would simply take the extra in our case £32,000 per year extra cost. As we provide this service for free, we would be forced to either charge our customers, or disconnect thousands of existing customers and return the ranges. I don't believe this would protect numbering in any way.

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?:

Charging network providers for geographic numbering would not increase the availability of numbering. It will just force smaller operators out of business, increase prices and cut competition. The problem is that you allocate numbers in 1k blocks, because older systems are unable to process smaller ranges. These systems are more than able to cope with porting individual numbers. Why not just allocate 100 numbers at a time ? Or use the existing BT network to host all the ranges, allowing porting of all numbers between operators within 24 hrs, as the mobile networks do. Pass the ownership of numbers to the end users, rather than allow networks to sit on unused ranges ?

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

Agree, another change would not be welcome by anyone.

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

Yes

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:

yes

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.:**

I don't see any great issues with this solution

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

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.:

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?:

supply small number blocks and force cp to provide data on number usage

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

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?:

12 months

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?:

quite small, it's only a software update. We currently all can port specific numbers to other operators upon request

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 of course, however this problem lies with the BT datafill that takes 4-6 weeks to complete. It would be very unfair to lose a large customer order if the CP had to order more numbers of an existing range. It takes almost 2 months from making an allocation request to actually getting the numbers live.

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?:

none, It works well as is.

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, I think supplying 100 numbers per area should be a standard across all ranges. Open allocations should be reduced to 1000, from 10,000

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?:

not really, porting already takes place like this

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

none, great idea

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

CP should have to supply quarterly sub-allocation figures to open

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

No, it's just a tax on business. What about the free operators ! This would be the end of our free business model.

Charge operators for not using numbers, or simply take the unused numbers back

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?:

Overall, I suspect that it would increase over time. As simply this cost would be passed on to end users, charging for allocations wouldn't make any difference to any CP turning over £1 million.

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

Why not charge operators for not using allocated numbers !!! If the problem is CP's not using numbers that have been allocated to end users. I am sure this would result in many ranges returning to Ofcom.

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.:

Strongly disagree. force all operators to only hold 100 spare numbers, therefore returning thousands back.

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.:

disagree, there is still plenty of capacity

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

No, Why should a CP pay an annual cost of £62,000 to ofcom just to be able to provide a UK wide allocation of area codes. I'm sure larger CP wouldn't have a problem with this but, small start up/ web based operations would see this as a real barrier to market.

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? :

Yes, We wouldn't be able to offer our free number service, which is very unfair not only to us but our customers.

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.:

Agree, Ofcom should not be trying to make/run it's own telephone number market.

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?:

This would create an administration nightmare for everyone. Ofcom could easily open new area codes for the critical areas, 02+, 04, 06