

CABLE&WIRELESS RESPONSE TO A THREE-DIGIT NUMBER FOR NON-EMERGENCY HEALTHCARE SERVICES

18.08.09

Cable&Wireless

INTRODUCTION

Cable&Wireless is one of the world's leading international communications companies. It operates through two standalone business units – Worldwide and International. The Worldwide business unit (formerly known as the Europe, Asia & US business) provides enterprise and carrier solutions to the largest users of telecoms services across the UK, US, continental Europe and Asia, and wholesale broadband services in the UK. With experience of delivering connectivity to 153 countries - and an intention to be the first customer-defined communications services business - the focus is on delivering customers a service experience that is second to none.

Cable&Wireless has also recently purchased Thus, a provider of Internet, data and telecoms services which focus on serving the SME market.

Cable&Wireless has experience in the implementation of three digit number services through the introduction of the 101 Non-Emergency Service for the Home Office. This experience allows us to fully support the Department of Health's (DH) request for a three digit number for a Non-Emergency Healthcare Services.

Unfortunately we are unable to support the choice of 111 as the three digit number. Of the available 1x1 and 11x numbers it is perhaps the worst possible choice due to the increased likelihood of misdials and phantom calls. Many of these issues may be resolved on the service itself, whether as Ofcom has identified, by introducing a four-second delay to the call routing or by introducing a block on the over dialling of 1's.

Cable&Wireless is also extremely concerned by the potential impact on our Emergency Operator service. The DH expect their service to generate between 14m-30m calls – any significant volume of misdials resulting in the generation of a 112 call threatens to swamp our Operator Services particularly during busy periods.

Cable&Wireless has some concerns about whether the usage of 111 may breach international agreements made by the UK Government. Historically, the entirety of 11x was reserved for CEPT harmonisation, an agreement that we believe dates back a number of decades: although some countries use various 11x numbers for national/non-harmonised services, these were in existence prior to the CEPT agreement versus being subsequently introduced. We have been unable to locate the CEPT agreement that reserved 11x for service harmonisation so cannot be sure if it is still in force, but note that (obviously other than 112, 116 and 118) Ofcom continues to reserve 11x for CEPT harmonisation. If it is considered that the agreement is obsolescent, it may be appropriate to change the designation of the remainder of 11x.

The importance to consumers of being able to access Non-Emergency Healthcare Services is such that Cable&Wireless requests that Ofcom considers making access for any future three-digit number mandatory from all fixed and mobile networks.

Cable&Wireless calls upon Ofcom and DH to consider an alternative three digit number in order to avoid such issues. We provide more detail in response to the questions below.

QUESTIONS

1. DO YOU AGREE WITH OFCOM'S VIEW THAT THE PROPOSED NON-EMERGENCY HEALTHCARE SERVICE REPRESENTS A JUSTIFIED USE OF A THREE-DIGIT NUMBER? PLEASE GIVE REASONS FOR YOUR VIEWS.

The case put forward by the DH and Ofcom is convincing in its support of a three-digit number. We note that the consumer research conducted by DH has been particularly supportive of the plans. As a result Option A: no change and Option C: Numbers from ranges designated in the Numbering Plan are clearly deficient in terms of their impact on the consumers' consciousness and as such are not supported by Cable&Wireless.

Option D: Harmonised European Numbers for Social Services is of some interest due to the numbering efficiency created by using a single Europe-wide number to provide a 'medical-on-call' service. However we note that these numbers have a somewhat laborious method for implementation and doubt whether, even if the definition of the service can be sufficiently widened to incorporate the DH service, agreement can be reached in time to avoid postponing DH plans.

Furthermore it is clear from the consumer research that a six-digit number will be harder to promote to the caller than a three digit alternative. Although 116 XXX will obviously benefit from publicity as the services become available, to date there is little public awareness of the 116 range. As a result Cable&Wireless agrees that Option B: Three-Digit Number is the preferred option. This offers the most memorable number for consumers and as such will be robust enough to withstand a niche service competing on the 116 number. If anything it is likely that the 116 number (should it to be broadened beyond its current designation) will by contrast receive little traffic, in much the same way as 999 traffic volumes dwarf those for 112 in the UK.

There are obvious parallels with the service offered by the Home Office on the 101 number. It is clear from this precedent that the service proposed by DH is entirely viable and the nature of access to Non-Emergency Healthcare Services has strong parallels with 101 being for Non-Emergency Services.

**2. DO YOU AGREE WITH THE DHS VIEW THAT:
- A THREE DIGIT NUMBER IS THE BEST CHOICE FOR THE PROPOSED SERVICE; AND
- OF THE THREE DIGIT NUMBERS AVAILABLE, '111' IS THE BEST OPTION?
PLEASE GIVE REASONS FOR YOUR VIEWS.**

As set out in response to Question 1 Cable&Wireless believes that the use of a three digit number is the best option for DHs. Unfortunately we can not agree that the 111 number is the best option from the available numbers. There are several issues with the use of the number that have been raised both in the research conducted by the DH and also by Ofcom. In both cases these have been dismissed too lightly and unfortunately remain of real concern to Cable&Wireless.

- Misdials

We note that as Ofcom sets out in paragraph 4.85, the ergonomic advice provided during the 101 consultation clearly indicated that in order to avoid misdials the same number should not be repeated consecutively. In this respect, whilst 111 provides the best option in terms of the consumer consciousness, it is by far the worst possible option in terms of potential misdials. During the DH research consumers expressed the opinion that the possibility of misdials was a small price to pay, but the knock-on impact of misdialling Cable&Wireless believes to be potentially more serious than purely consumer inconvenience.

111 is seen to have a strong association in the consumer research with the Emergency Calls associated with 112 and 999 and we question whether such a close relationship is desirable. Both 101 and the DH solution are non-emergency and we believe that a greater distinction should continue to exist in consumers' minds than 111 offers. Cable&Wireless' experience as an Emergency Calls operator has shown that every second is vital in the case of medical emergency calls. As such the possibility of calling the wrong number or a practice of using 111 instead of 999 could literally have life and death ramifications. The branding of 111 would need to be very strong in order to make the differences between the options abundantly clear. Without this identity the benefit of transferring non-emergency calls away from 999/112 will not be realised and the possibility of confusion the other way could have tragic consequences.

Of possibly greater concern however is the impact of misdials on the BT and Cable&Wireless Emergency Operator Services. The 111 number in dialling terms is very close to 112 on the keypad and there is a real danger that misdialled calls to the DH service will instead trigger a call to 112. The DH has estimated that the new service will generate between 14.4m and 30m calls per annum. It is Cable&Wireless' expectation that the daily peak in calls will coincide with those made to the Emergency Services (traditionally from early evening). In such a situation an influx of misdialled calls at the Emergency Operator Services' busiest time is likely to swamp the Emergency Call Handling operatives. Whilst to a caller of 111 such a misdial may be an inconvenience, a volume of such calls will have a fundamental impact for anyone dialling the Emergency Services. There should not be an expectation that Cable&Wireless or any of the other Emergency Call Handling Operators has the spare capacity in terms of resource to be able to cope with an unexpected increase in call volumes at peak times.

- Overdialling

The DH in their research state an expectation that landline services will ignore any extra digits after the initial dialling of 111 i.e. dialling 1111 will still put the call through to the DH service. Unfortunately Cable&Wireless can not guarantee that this is indeed the case for all calls or indeed for all areas of the country. It is our view that CPs will need to carry out an audit of individual switches in order to ascertain whether such overdialling was possible. For many switches it is usual to set a maximum and minimum value for the number of digits. These settings determine the digit length before the call is physically routed. The settings vary between switches, let alone networks. As a result for an operator such as Cable&Wireless which has a historic amalgamation of different networks there is no

consistent setting across switches and as a result each switch would need to be investigated independently. Similarly each network operator would be forced to conduct similar costly and resource intensive investigations. Such costs can be easily avoided by selecting a three digit number which does not have such a high chance of misdial, such as 1X1 or 11X.

Indeed introducing databuild to route overdialed numbers to the DH service may actually exacerbate the problem. The 999 service suffers from a similar issue and as a result many operators block overdialed calls to 999 in order to prevent phantom calls. The situation for 999 is worse than 111 as it may be dialled whilst a mobile handset is locked. However the principle remains the same and an unlocked mobile handset is still possible of generating large quantities of phantom calls.

- Phantom Calls

Both the DH and Ofcom recognise the issue of phantom calls generated by pulses on an operator's network. The 101 number has suffered similar issues which have been found to have been alleviated somewhat through the use of a four second delay on the network. This would be implemented at the DH end of the service and consequently would alleviate some of the issue; however we would caution that the use of repetitive 1 digits will make the instances of phantom calls much more severe than those experienced on 101 (in essence, for pulse dialling there needs to be 12 phantom pulses on the line to trigger a misdial to 101, whereas to 111 there needs to be only 3). The belief that the inability of locked mobile phones to dial 111 without being unlocked will reduce the number of phantom calls in comparison to 999 / 112 is likely to be true, however it is a premise that is entirely reliant on mobiles being locked whilst carried in people's pockets.

Cable&Wireless' experience from 112 misdials shows that even a single number can generate a significant number of repeat phantom calls within a short period. We have taken some random samples of these 112 phantom calls and found that a single CLI can generate anywhere between 50 – 80 phantom calls a day; whether a fixed line or mobile. Please note that due to the importance of passing genuine Emergency calls through to the Emergency Services with the minimum possible delay Cable&Wireless does not agree with the introduction of any delay to Emergency calls.

We have attached below a table indicating the number of calls made to Cable&Wireless Operator Services using the 112 number. Of these calls we estimate that <1% are genuine emergency calls and that the rest are phantom calls.

Figure 1: 112 Call Volumes

We also looked at those calls generated by repeat offender CLIs and have included details. The figures are indicative of the number of phantom 112 calls generated over the periods given. They represent calls only from those numbers which are repeat offenders within a single day. This is representative of the extent of the problem caused by phantom calls on both the fixed line and mobile networks. Cable&Wireless has seen some recent improvement in the number of fixed line generated phantom calls, but it remains a significant issue which the use of 111 is likely to exacerbate.

Figure 2: Repeat 112 Calls

Cable&Wireless is also aware of the situation in New Zealand where the Emergency Services operate on the 111 number. During a recent independent external review of the *New Zealand Police Communications Centres Service Centre*¹ some 65 recommendations were made in relation to the handling of Emergency calls. Amongst these largely operational recommendations was a call for the New Zealand Government “to consider a long-term (10-15 year) move away from the emergency number “111 due to misuse of repeat dial numbers” and to avoid the growing trend in mobile handsets generating repeat single digit numbers such as 111.

3. WHAT ARE YOUR VIEWS ON THE TARIFF OPTIONS SELECTED BY THE DH?

Cable&Wireless agrees with the DH that the tariff for these numbers should be set through negotiation with the selected Service Provider and Communication Provider. As such we have no further comment to make on the potential tariffs selected other than to note that they appear appropriate for the type of service on offer.

We do however believe that there is a role for Ofcom in this process and that the final agreed tariff should be enforced through the numbering plan. Experience from the 101 service demonstrated a number of difficulties when encouraging operators to charge their customers at the level intended by the Home Office; indeed not all operators charge at this level. It is clearly not for Cable&Wireless to determine what the commercial offerings of its competitors should be. However we note that this service is intended to be one of particular importance to all consumers including those from disadvantaged social groups. Ofcom should therefore take the steps necessary to ensure the highest possible level of pricing transparency for this service. We note that both the 116 and 03 ranges which have been recently introduced have had accompanying tariff ceilings enforced through the numbering plan and we believe that a similar solution would be beneficial for the DH service once the commercials have been agreed by all parties.

4. DO YOU HAVE ANY COMMENTS ON THE PROPOSED NOTIFICATION OF MODIFICATION TO THE NUMBERING CONDITION IN ANNEX 8 OF THIS DOCUMENT?

Cable&Wireless believes that the numbering condition in Annex 8 should also include a tariff ceiling. We draw Ofcom's attention to our response to Question 3.

We also request that Ofcom considers making access to this number mandatory from all fixed and mobile networks due to the importance of the service. The suggestion that the implementation of 101 did not meet with “significant issues” is perhaps an over-simplification. Cable&Wireless did meet resistance from some operators when trying to have access to the 101 range opened. In light of the public interest in the DH service and the proposed timescale for implementation

¹ www.police.govt.nz/resources/2005/comm-centres-review/comm-centres-review.pdf

Cable&Wireless asks Ofcom to consider whether the designation of the chosen three-digit number in the Numbering Plan allows Ofcom to facilitate the provision of service across networks.

Cable&Wireless is otherwise in agreement with the proposed change to the numbering document.