

**Q1 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. :**

**Q2 Do you agree with the DHs view that:**

**A) a three-digit number is the best choice for the proposed service and  
B) of the three-digit numbers available, 111 is the best option?**

**Please give reasons for your views. :**

THA believes that, with the imminent introduction of 116 117 for non-emergency health calls, 111 will only serve to confuse the market and be superfluous. It also means that there are two sets of negotiations to be undertaken with telecom providers regarding call charges and termination charges. It will also cost more in publicising the two numbers. The consultation document does not provide sufficient evidence on the benefits of introducing the 111 now and 116 117 number later.

If the 116 option is used, plans must include educating the general public about the 116 range as a whole. At the time of this response, the 116 range is not well known, similar to the THA range of 0808 80 free-to-caller numbers.

**Q3 What are your views on the tariff options selected by the DH? :**

We are pleased that the DH has disregarded the 'freephone' option. The confusion caused by 'freephone' is one of several reasons why THA is working with Government and the mobile providers to develop a framework for waiving charges to callers from mobiles to freephone Government helplines.

We are also pleased that the DH has disregarded the 0845 option. The 0845 range also causes confusion both for helpline providers and consumers. 'What is the cost of calling an 0845 number?' is one of our most frequently asked questions by members. In fact we believe the consultation document could have highlighted more strongly the price of calling 0845 calls from mobiles - up to 40p per minute - and the use by BT of a set-up fee of 9.05p (from October 2009) for calls to 0845 numbers where these calls are outside inclusive packages.

From the shortlist that the DH has arrived at (free to caller, 10p per call, 3p per minute, as geographic). THA's preference would be 'free to caller'.

We also believe that:

- if the service is finally allocated a number in the 116- series, then the tariff should be consistent with other 116- numbers. Our view is that charging within this range should be consistent. The current situation, where a decision as to whether a service is freephone or free-to-caller is made on a case-by-case basis, is confusing for callers.

- if the service is 'free to caller', then mobile networks should ensure that the service can be called from a pay-as-you-go phone without credit

- TCPs should be encouraged to include the cost of calling this service (even if it is free) as a clear item in their tariff plans. This includes landline and payphone publicity.

**Q4 Do you have any comments on the proposed notification of modification to the Numbering Condition in Annex 8 of this document:**