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Dear Elizabeth

A Three digit Number for Non Emergency Healthcare Services

Virgin Media is pleased to respond to the above consultation. We set out below our views on the proposals made by Ofcom.

Question 1: Do you agree with Ofcom's views that the proposed non emergency healthcare services represents a justified use of a three digit number? Please give reasons for your views.

Virgin Media's view is that the use of a three digit number for non emergency healthcare services may bring benefits to the public generally and therefore may represent a justified use of a three digit number. However Virgin Media's view is that this cannot be assessed in isolation from the actual number that has been chosen and for the reasons set out below Virgin Media is vigorously opposed to the selection of 111.

Question 2: Do you agree with the DH's 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.**

Virgin Media notes that although the number is suggested in the consultation to be a three digit number for non-emergency healthcare services the actual research carried out was positioned as "the establishment of a three-digit number for urgent care". Virgin Media suggests that this positioning is somewhat at odds with the idea that the number is a replacement for NHS Direct and believes that the focus on urgent need scenarios may well have influenced people in their views that the number should be very similar to 999.

Virgin Media is opposed to the choice of 111 on the basis that this is likely to lead to significant numbers of misdialled calls because of electrical pulses generated by wiring. Virgin Media feels that Ofcom's consideration of the issues relating to misdials generated by electrical pulses is manifestly inadequate. At paragraph 4.55 Ofcom says "it is expected that a "four second gap" will be centrally implemented

which will avoid any work needing to be done by landline providers. Therefore to the extent that providers already have functionality in place, it should be the case that the costs of extending this to another three digit number would be relatively minor. There is no consideration however of what these costs would be. Similarly at paragraph 4.19 Ofcom also says "However, mis-dials to 101 and 112 have been almost eliminated by the use of a four second gap (see paragraph 4.55 above) and therefore the same system on 111 would also prevent this type of misdial on this number."

Virgin Media notes that its experience with the four second delay that it has introduced on 112 shows that the delay succeeds in stopping around [Redacted] of spurious calls on its network. It finds it difficult to reconcile this with Ofcom's view that the four second gap has almost eliminated spurious calls.

Since the release of the consultation document Virgin Media has monitored ex NTL switches for spurious calls to 111. Based on those figures its view is that across its whole network approximately [Redacted] calls per day would be generated to 111 in the absence of a four second delay. Even if the four second delay on 111 was equally as efficient as the four second delay on 112 there would still be some [Redacted] spurious calls a day being generated from the Virgin Media network alone. One would expect that the BT network because it is far more ubiquitous is likely to generate a far greater number of misdialled calls.

Depending on the NHS answering system some of these calls will be answered by the answering service thus diverting resource unnecessarily. In addition where calls are answered by the NHS the customer will be charged for that call. This in turn is likely to cause costs for providers who will need to deal with customer complaints arising from misbilled calls.

Virgin Media notes that the likelihood of calls being generated by electrical pulses is reduced by the use of higher numbers. Therefore it would suggest that a different three digit number such 117 or 119 would help to reduce the problem of misdialled calls.

It is clear that while 111 is the preferred number other numbers could with sufficient publicity work. Indeed as an example of the fact that other numbers could with sufficient publicity be suitable Virgin Media notes that the annexed research indicates that "Ultimately few thought that 114 is a bad number and given sufficient publicity it is likely to be perfectly adequate." This is indicative that another number besides 111 could work and in this context Virgin Media suggests that there is merit in considering 117. Virgin Media notes that 117 would fulfil the criteria that the easiest numbers to use were those with minimum movement required between the keys and for mobile phones the numbers are at the top (1) and left (7) of the keypad.

The other very important advantage of 117 is that if the 116117 number is adopted for the European Harmonised Number there is a clear linkage between this and the UK number and there is less likely to be confusion amongst the public. Whilst DH consumer research found that 117 held no resonance with consumers, Ofcom's consultation paper also showed that the easier a number is to dial, the easier it is to remember. In that respect 117 is easy to dial and the ease of use along with adequate publicity is likely to cement it in the public's mind. Virgin Media does not believe that consumers will become confused between 117 and 118.

Virgin Media would therefore strongly urge Ofcom to reconsider its choice of 111 and would suggest 117 as a better alternative.

Question 3: What are your views on the tariff options selected by the DH?

Virgin Media's comments on the tariff options are that any option that is adopted must be commercially viable for originators. A key part of this is that the termination charge must adopt the same structure as the retail tariff so that originators are not exposed to commercial risk. However in the absence of negotiation with the relevant party who is going to provide the termination service it is difficult to comment more specifically on the appropriate option. However originators must be able to cover their wholesale costs.

Question 4: Do you have any comments on the proposed notification of modification to the Numbering Condition in Annex 8 of this document?

Subject to its comments above Virgin Media has no comments on the proposed modification to the Numbering Condition.

Virgin Media welcomes the opportunity to respond to this consultation, and we would of course be happy to discuss the matter further or expand on any of the points that we have made. Please do not hesitate to contact me should you wish to do so.

Yours sincerely

Annemaree McDonough
For and on behalf of Virgin Media