

Title:

Mr

Forename:

Antony

Surname:

Chung

Representing:

Self

Organisation (if applicable):

Email:

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What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Question 1: Do you agree with our analysis of consumer detriment on the 070 number range?:

Yes.

070 numbers are often used to allow people to call somebody who might be quite mobile or to reach relevant shift workers/family contacts. Moving these numbers will

cause problems because users will need to notify these changes.

I believe that regulatory changes should be put in place within the 070 range instead of doing so in a new range. Remember, 070 is intended for use by people that do not want to change their number - your proposal to do this is exactly what most users aim to avoid.

Question 2: Do you agree that the costs outweigh the benefits in relation to closing the 070 number range and migrating users to an alternative range?:

Yes. The cost on a per user basis is not necessarily known and the risks of doing so may put life at risk as these numbers may be used irregularly (alarms, emergency call out, etc). I point out that 070 numbers are intended to avoid number changes in the first place.

Question 3: Do you agree that Ofcom should keep the 070 range open and monitor the market in light of enforcement action by PhonepayPlus?:

Yes. Keep the range open. Make regulatory changes that protect honest users and punish/exclude dishonest users. Make it faster to close down dishonest lines so that users are not charged, or make it easier to recover costs.

Question 4: Do you agree that Ofcom should require OCPs to give greater prominence to the cost of calling 070 numbers in published price lists and promotional material?:

Yes. All phone companies should make call costs known in advance for free anyway - this is not a problem isolated to 070 numbers. Technologies such as free SMS, freephone systems and websites could provide this data to users without being complex or requiring costly updates.

Importantly, users should be aware that the 07 prefix does not mean 'mobile phone'. It should be the responsibility of the phone companies to do this.

Question 5: Do you agree that Ofcom should amend its guidance to ensure that PNS providers carry out appropriate due diligence of sub-allocates of personal numbers?:

Not really due to practicality. Unless a straightforward way for doing this could be used - such as credit card payment.

Credit cards, however, may not be suitable. They may not properly authenticate a user and may exclude users without such cards. It is reasonable to assume that many 070 users are using the service to avoid costly redirection services offered as part of contracted telecoms. Implementing such a procedure may exclude such users unfairly.

Having all users send bills/passports/driving licenses is unlikely to work and will place users at risk. The sudden reduction in user numbers may put companies at risk along with all the customers they serve.

I am aware of problems with international users on the PNS services. There does not appear to be a lack of PNS allocations at the moment. As an aside, I do not want to see international forwarding removed from 070 services - because I believe I have the right to do this if I am on holiday/at a conference.

Question 6: Do you agree that Ofcom should not bar the presentation of 070 CLI? Please provide evidence to support your response:

070 CLI modification should be barred. Network security is an established field and we can learn that it is beneficial to have a trustworthy source identity when calls arrive. The telephone network provides this with CLI with greater confidence than technologies such as the Internet. However, 070 CLI removes this confidence because it changes the source artificially, so a user returning a call to an 070 number may not necessarily reach the caller.

Also, there is a risk of spoofing attacks - where blocked or malicious users may deliberately change their caller ID by using an 070 service. Thus they can bypass any established blacklists (either on handsets or in the network) and also avoid withholding their number. This may present a big problem to telephone users that are being harassed. This is because it is easy to get a large number of anonymous 070 numbers in a short period. Obtaining other numbers is less straightforward.

However, some users might need to use this feature where the only alternative is to withhold numbers when calling clients (to avoid clients calling the wrong number). That could be bad for business. But frankly I would rather deal with a company providing a geographic number.

Question 7: Should services provided by, for example, Hospedia, Premier Telesolutions and Trader Media be provided on an alternative number range to 070? Please provide any evidence to support your views.:

Yes, I believe so.

070 numbers are intended for long-term use. Services such as Patient Line and Auto Trader assign numbers for short periods of time (often less than a week). Frankly a switchboard number is probably more appropriate in these cases.

Use of 070 for extended periods should be promoted, along with a new number range for short assignments. This would allow consumers to understand the difference.

Examples of long-term 070 services include those used for call-out, 'follow-me', etc. Companies providing these services include Flextel and YAC. These would benefit from being left in 070, whilst the above would probably feel considerably less inconvenience.

Question 8: Do you agree that Ofcom should withdraw formally the requirement for pre-call announcements on 070 Personal Numbers?:

Yes. This introduces a delay to automated systems (like alarms), emergency numbers (for nurses, technicians) and family numbers. This may cause failure and ultimately risk to life and equipment. It may also confuse some users that have not heard the announcement before. So I believe the announcements should not be played on services like YAC and Flexitel.

However, such a requirement may be welcome for services such as Patient Line and Auto Trader - where the numbers are unlikely to be used for such purposes. Moving those to a new range and then applying the pre-call announcement would be useful.

Additional comments:

I welcome Ofcom's action against dishonest users, but I strongly believe that honest users should be left in peace. Please work on stronger penalties and quicker action.

(I have a background in network security, computer science and radio communication from academia, teaching, research and industry. I also use 070 services regularly.)