

Title:

Mr

Forename:

Mark

Surname:

Goodge

Representing:

Self

Organisation (if applicable):

Email:

mark@good-stuff.co.uk

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?:

Broadly, yes. I remain concerned at the exploitation of 070 for purposes where 08x (or, indeed, a geographic number) would be more appropriate, such as responses to adverts and communication with hospital patients.

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?:

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

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.

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

Yes.

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

Yes. Many people decline calls from CLI-barred numbers as these are often unwanted telesales calls. If an organisation has a legitimate reason to use 070 then they have a right to present that number to the recipient so that their calls will not be unnecessarily declined.

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. It is inappropriate for personal "follow-me" numbers to be used for non-personal communications where the termination is to a switchboard capable of making such redirection itself.

In the cases of both Hospedia and Trader Media, a geographic number (possibly delivered using VOIP) relating to the actual location of the advertiser or hospital would be more appropriate. Where this is not possible, numbers in the 03x or 08x ranges should be used for such services.

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

Yes, provided that rates are capped on 070 numbers so that this is not a significant financial issue.

Additional comments:

Rates for 070 numbers should be capped at a cost no greater than those in the 087 range. A separate numbering system should be provided for those users who have a need for "follow me" numbers with a higher termination cost, and such numbers should have a mandatory PCA.