

Title:

Mr

Forename:

Roger

Surname:

Hull

Representing:

Self

Organisation (if applicable):

Email:

roger.hull@moonhusky.com

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

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, see my additional comments.

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:

Does not matter either way to me.

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. 070 was intended to be for "follow me", and these users are abusing it as a type of premium rate number.

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

Yes, see my additional comments. However, an alternative solution would be to have two types of service operated by PNS providers: type (1), caller pays mobile phone rates and PNS user pays the PNS provider for the service; type (2), caller pays the current rates, PNS user does not pay (as currently operated by my PNS provider Flextel). For type (2) only, a pre-announcement could be mandatory. This would stop the scams without affecting genuine users like myself (who would be happy with a type (1) service).

Additional comments:

It would be very costly to me if I lost the use of the currently allocated 070 number. Although my use of an 070 number is unusual, I am sure there are many other people who have their own special uses for this service.

I have 8 dogs, who all have (the same) 070 number on a tag on their collar. This number is forwarded to my mobile number, which I have from work. This work mobile number will of course change if I change jobs. But the dogs' collars use a brass name tag which is engraved with the 070 number, and the collar is sewn together by my wife with the tag permanently attached. This way I can be sure that the dog can never lose the tag from the collar. And if a dog gets lost and someone finds the dog, I can get informed straight away (to my mobile), even if I am away on holiday with the dogs, as I always have my mobile phone with me. (It would not be practicable to have a second mobile phone number just for the dog collars, I can't carry two phones with me everywhere!)

If I am ill, I can switch the 070 number to be forwarded to my wife's mobile phone.

If I had to change the number, I would have to

- buy new name tags (these cost about £8 each)
- have the tags engraved (also costs about £8 each)
- have new collars made (new material is about £2 only, but sewing the collars together by hand is very hard work and time consuming).

This would probably take at least one month, probably two months, to buy the tags, get them engraved, and make new collars. Meantime the dogs would not have the correct number if I did not have enough notice of the change.

I was horrified when the price announcement suddenly came into action. If I lose a dog, I rely on the goodwill of someone who finds the dog to phone me. I don't want someone put off phoning me by an announcement like this, that it will cost them a lot to phone (actually it won't cost them that much for just a short phone call). I'd be happy to refund the call costs, but if they get put off calling I would not have an opportunity to offer this.

Last time this happens was some years ago. We lost a dog who got scared and ran off for three days, while we were searching everywhere. Fortunately someone found her and phoned me. For this reason, it doesn't bring the 070 number provider much revenue: I don't lose the dogs very often. But when it happens, I need a system that works.

I can't think of any other system than personal numbers which would perform this job, without paying a monthly rental for some service for very occasional but vitally important use. Premium rate numbers are obviously not appropriate!

I would be happy to pay the personal number call costs, if this meant that the users could just pay at normal mobile rates for calling the number (as described in my response to Qu. 8).