

**What do you want Ofcom to keep confidential?:**

Keep name 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?:**

In general, yes, I agree.

**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?:**

Any migration would incur some level of cost to those using the 070 service. See my answer to Q3.

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

The 070 service should be kept open. In addition, perhaps providers of the 070 services should include a pre-announcement as to what additional cost use of the service will invoke over a normal land line call. "Call18866.co.uk" have a facility whereby they announce the pence/minute for calls using their service. Why can't other providers be encouraged or required to do a similar thing.

**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. See also my answer to Q3.

**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. I might call contacts from a variety of different phones depending upon where I am. I should like the receipts of these calls to be able to get back to me at my current location, and not at the phone from where I called them. Many people now rely on CLI to capture phone numbers, and it would seem appropriate that they can capture the one that will work, even if I have now moved to a different location.

**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.:**

No views about this.

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

No.

**Additional comments:**

Many telephone service providers now provide inclusive calls to 01 and 02 numbers either as part of their offering or for a small fixed monthly charge. Calling a call centre on a geographic number is covered by these inclusive calls. This does not apply to 070 (or 0870 or 0845) numbers. As many companies are now using non-geographic numbers for their call centres, and calls to these numbers often start with a fairly lengthy recorded message about web site services, followed by a list of options to reach different departments. It can take well over a minute before a call is transferred to the correct department. After this, the call can be held in a queue for a considerable time. To date, my worst experience has been a wait of over 20 minutes on an 0870 number before spending less than 2 minutes talking to an agent to resolve my problem. That call effectively cost over £1 per minute of actual talk time, and that was from my home land line.

This situation is bad enough from a land line or from a mobile on contract, but can be disastrous for 'Pay As You Go' mobile users who can easily use up all their credit while waiting in the queue for an agent.

A few companies do give a clue as to how the queue is progressing, either by reporting the current position in the queue every minute or so, or by announcing the

expected wait time remaining at similar intervals. The majority of companies simply ask the caller to keep holding.

I should like to propose a change in the way non-geographic numbers are licenced so that the caller has a fair idea of how much a call is likely to cost. I can think of three different ways this might be achieved:

One, companies who use 070 and other non-geographic numbers are forced to give an indication of remaining wait time (either in minutes or queue position) at regular intervals.

Two, companies must offer a call-back service if a call cannot be connected to an agent in (say) less than 5 minutes.

Three, (my favourite) calls to 070 as well as 0870 and 0845 numbers have a fixed maximum charge to the caller, after which any remaining charges are made to the company who uses the service. Perhaps a limit of 25p for 0845 numbers, 50p for 0870 numbers, and £1 for 070 numbers should be charged to the caller. Any further costs for the call are charged to the person or company that is being called.

At the moment, for the majority of call centres, a caller has no way of knowing how much longer they will have to wait to speak to an agent, and therefore how much their call will cost.