

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?:

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

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?:

No - It would not be possible in some circumstances, it would be an invasion of privacy, and it could mean increased costs to the sub-alloctees because of increased costs to the PNS providers.

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

Yes - because in legitimate usage your customer needs to call back the business on the PNS number so the call can be routed correctly.

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 - because such services are clearly premium rate and not call forwarding. As the cost of mobile and international calls has reduced there should be a ceiling on the rate charged by OCPs to PNS numbers

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

Yes - PCAs should only be used on premium rate services, and if OCPs reduce the price of calling PNS numbers then a PCA is not required.

Additional comments:

I believe that all PNS numbers below a price which is sufficient to cover the cost born by the PNS providers to forward to international mobiles, should be kept open. To avoid scamming, higher charge PNS numbers (including Hospedia, Premier Telesolutions, and Trader Media) should be migrated to the 09 number range, thus relieving the requirement for PCAs on the remaining 070 numbers.