

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, although in my experience the ban on revenue sharing has done the job of curbing abuse.

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?:

Undecided on this one. A good idea in principle, but current practice, for example as seen with 0845/0870 numbers is largely useless. "Calls from BT landlines will cost no more than 6p/min; calls from mobiles may be considerably more" is pretty unhelpful - if you are using anything other than a BT landline (as ever more people are), this still requires you to go away and look at your provider's price list. Putting a similarly worded warning on an 070 number could in fact lead people to expect a similar charge to 0870.

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?:

Broadly against this. The motive behind the suggestion is good, but I like the way that I can obtain personal numbers without having to jump through a lot of hoops in terms of proving my identity, and also without having to provide too many personal details to the number provider (who is often not a company whose name I know and trust).

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

Yes. Providing any contactable CLI is an improvement over "number withheld", which would be the alternative in most cases (for example where the number is being used to put calls through to a different on-call engineer each day).

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 strong views on this, but the 08 range seems somewhat more appropriate (providing what's effectively a business number rather than a "follow me" personal number). Or perhaps even 09, where the main reason for the choice of these numbers is their higher call charges and therefore higher revenue (as I believe is Hospedia's main motivation behind their use).

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

Yes, for the reasons stated in the consultation document - the benefits are outweighed by the safety considerations, not to mention the bother of listening to a message.

Additional comments:

Something I didn't see mentioned in the document, that I would like to see considered, is making charges for 070 numbers much more consistent across the board, and bringing them into line with those to mobiles (i.e. up to 35ppm, and included in inclusive minutes along with off-network mobile calls). I realise that the cost breakdown and so on will vary in different cases, but so do mobile interconnect charges, and I'm not aware of any mobile phone company that charges different rates for off-network calls to different UK networks - such charges can be averaged out.