

Title:

Mr

Forename:

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Surname:

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Representing:

Organisation

Organisation (if applicable):

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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. Opening up 10% of the Numbering spectrum just to fix an inconvenient aberration is bad practice.

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

No, the 070 range has always been prone to scams and even if moved, this would continue.

This will continue unless effective enforcement is in place.

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, PRS conditions as applied in 09 should apply.

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, they should be part of the enforcement loop.

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

No

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.

There are more suitable ranges, such as 09 PRS which are better controlled and have the advantage of a wide range of competitive tariffs.

The use of 070 is detrimental to other uses.

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

No. Removing the need for pre-announcement is a poor decision. The issue of alarm calls is a largely smoke screen, there are other non-geographic ranges which would be better used for such applications.

Additional comments: