

Title:

Mr

Forename:

David

Surname:

Topping

Representing:

Self

Organisation (if applicable):

Email:

d@topping.tv

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

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?:

Only if Ofcom force all originating networks to charge no more than the prevailing retail rate.

EXAMPLE: Currently, if an 070 number costs 20ppm to dial from a BT landline, that cost will be substantially higher if the same 070 number was dialled from a mobile network operator, as mobile network operators currently levy unfair, higher charging to such number ranges.

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, but only if the due diligence requirements were kept to a minimum and not made:

- 1) Intrusive
- 2) So overwhelming as to place an undue financial or administrative burden on any 070 service provider

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

Yes.

There are many situations where the the presentation of an 070 CLI is not only legitimate, but also ideal, such as:

- 1) Mobile teleworkers not wanting to reveal their personal mobile number
- 2) IT companies providing out-of-hours support and callout services to their own

Customers, where a rota system is in use and such staff will not want their mobile number displayed to any Customer they are calling.

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.

Hospitals: Allow the use of mobile phones, as alternative to services already provided

Premiuer Telesolutions / Trader Media: There are many sole traders who would find it difficult to provide an alternative number which was easily accessible by them.

Example: A sole trader, using an 070 number to shield their private mobile number. In a situation such as this, the only alternative number which the sole trader may be able to provide is the mobile number itself, which would defeat the privacy afforded by the use of aforementioned 070 number.

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

Yes

Additional comments: