

**Title:**

Dr

**Forename:**

Mike

**Surname:**

Ward

**Representing:**

Self

**Organisation (if applicable):**

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

Keep part of the response confidential

**If you want part of your response kept confidential, which parts?:**

email address

**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?:**

Mostly.

**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?:**

No. The benefits cannot be assessed purely in terms of the costs borne by the victims of the various scams. The existence of this range, the similarity to normal mobile numbers, and the history of scams on this range has created confusion and distrust. Widespread confusion and distrust results in many costs to consumers and commerce which are difficult to quantify. Anything that can be done to simplify and clarify the distinction between premium rate (scam potential) and non-premium rate (no scam potential) is likely to produce many benefits.

**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. At least PhonepayPlus appear to now be taking meaningful action against 070 scams (unlike 09 and short code scams where PP+'s actions can still only be described as token gestures) but, for the reasons given above, it would be better if this range were abolished altogether.

**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, but only if 070 numbers are retained.

**Question 5: Do you agree that Ofcom should amend its guidance to ensure that PNS providers carry out appropriate due diligence of sub-allocates of personal numbers?:**

Yes, but only if 070 numbers are retained.

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

Yes, but only if 070 numbers are retained.

**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 - assuming 070 numbers are abolished.

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

No, although I realize that there are technical problems where 070 numbers are used by alarm systems.

**Additional comments:**

If Ofcom decides to retain 070 numbers, the simplest way to prevent the misuse of these numbers would seem to be to end revenue sharing on this range - as has been done with the 0870 numbers (cf the 0871 numbers). The 070 numbers (since they are now rather redundant) could then be phased out by natural wastage over a longer period of time.