

The International Telecommunications Union (ITU) is a treaty organisation and part of the UN. It administers the world wide telephone numbering system which is covered by Recommendation E.164 as well as international services which are defined in other Recommendations in the E Series.

The ITU allows its members to apply for "network codes" if they can demonstrate that they meet the required criteria set down in agreed Recommendations. These network codes are like any other country code and start +881 or +882.

The +881 codes are used for global satellite networks – many of which were not commercially viable and no longer exist and the +882 codes are used by a variety of services offered by telecommunications companies worldwide.

As a UK citizen consumer I would like to be able to call these +882 numbers to use the offered services from my fixed line or mobile phone. I can't as neither BT nor the major mobile companies allow their end users to call these numbers.

There are two exceptions - +882-16 numbers are widely supported and are used by the regional satellite service run by Thuraya of Abu Dhabi. The UAE used its influence as a Member State to press to get this opened (as did the EU in forcing BT to open access to +3883 "pan European code").

The other exception is that BT does permit access to +882-10 numbers which support an "advanced office" service offered by BT plc -called Geoverse and clearly a Premium Rate Service (where the cost of the call includes payment for the service provided) so no real surprise there!

BT has significant market power in the retail and wholesale market for international calls and has refused to allow its customers to be able to access the other services offered on +882 numbers.

I raised a fault on my own BT fixed line when I could not call +882-33 numbers (as I want to access the services using these numbers). Initially BT refused to accept there was a fault until I escalated to the CEO's office. I finally got a response that there was no regulatory obligation on BT to open this code and they had made "a commercial decision" not to.

Also as BT does not offer access to +882-33 numbers on a wholesale basis I have not been able to find a Carrier PreSelection or Indirect Access provider that I can use to bypass having to place +882-33 calls via BT Retail. I had thought that Ofcom's 2006 End-to-end Connectivity Directive placed obligations on BT - having Significant Market Power - to "purchase wholesale narrowband call termination services from any public electronic communications network (PECN) provider on reasonable request".

It seemed to me that this was contrary to article 4 of the EU Universal Service Directive and against the spirit if not the letter of the EU Access Directive 2002/19/EC, and I complained both to the ITU-T Secretary General and to Viviane Reding of the EU. I asked the ITU what the point was of allocating telephone numbers if no one could call them and I asked Commissioner Reding for her view on BT's conformance with EU Directives.

The ITU responded that it is an intergovernmental agency and has no power to force Member States to implement the resources they assign. They invited me to join in the discussions around updating the International Telecommunications Regulations (ITRs) which could be used to force Member States to implement ITU resources by Treaty as long as Member States agreed to the changes to the ITRs (unlikely).

Ms Reding's office responded saying that it is up to Ofcom as the NRA to enforce EU Directives and if I had a dispute with BT I should first take it to Otelo.

I raised the complaint with Otelo who told me that the issue was outside their remit as BT had made "a commercial decision" not to support +882-33 numbers.

This was some months ago and I lost the incentive to pursue the matter until I saw your consultation.

As a UK citizen-consumer I expect the UK regulatory environment to be such that I can access ALL resources on international telephone networks at a fair and reasonable cost, not just the ones that BT decides I should be able to call. Perhaps Ofcom should amend the General Conditions to force ALL Communications Providers to allow their customers to access all national and international numbers on a fair and reasonable basis.