

Title:

Please select

Forename:

Surname:

Representing:

Organisation

Organisation (if applicable):

Email:

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:

Yes

Question 1: Do you agree that it is helpful and appropriate for Ofcom to issue guidance on the application of the Regulations to consumer contracts for communications services?:

Yes of course

Question 2: Do you agree with Ofcom's proposed guidance regarding core terms and transparency?:

Yes

Question 3: Do you agree with Ofcom's proposed guidance (including any administrative thresholds we have set) on non-core terms to which we apply the test of fairness?:

Yes

Question 4: Are there any other issues that are covered by the Regulations which Ofcom should give guidance on?:

The most obvious one it seems to us.

This consultation supposedly covers overcharging by mobile networks, yet has made no mention whatsoever of the main long-term threat to the NGN industry.

The gouging of mobile callers (now responsible for more than a third of all calls made in the UK, according to your website) who call ostensibly low cost NGN, only to be charged up to 10 times the landline callers cost.

All of the major mobile networks charge more to call 0800, 0844, and 0845 numbers than can be justified.

In one case, Orange was found to be charging its customers up to 55ppm to call an 0844 number that could only have been 5ppm for a landline customer to call.

0800 numbers charged at 20ppm is quite common. At the time of writing, none of the mobile networks allow NGN to be included in a bundled allocation. At least one (O2) are not even warning their customer prior to connection that the 0800 number might cost up to 40ppm to call, instead of the 0ppm they might reasonably expect to pay.

We would like to request that Ofcom takes seriously this blatant overcharging and lack of transparency, before their vaunted 03 ranges are sold firmly down the river by greedy mobile operators, as we expect calls to 03 numbers to suffer the same fate as these other NGN.

To summarise (and generalise), 1 in three calls to an 0800 number are currently charged at 20ppm or more.

Additional comments:

We have already contacted Gareth Davies with our evidence, and hope to open a dialogue soon.