## **Response From Baines Racing**

Question 1: What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions?: Good, As an individual and a representative of the company I work for, having to call premium numbers is costly.

Question 2:What do you think are consumers? key current views on numbering, how do you think those views will change, and how should Ofcom?s current decisions take those changes into account?: Until I found out about this web site I really did not realise how much these numbers were costing/charging per minute. Any consumer will use the number that is available and I think Ofcom needs to make sure that companies cannot charge premium rates.

Question 3: What do you think are the main ways in which technological developments will change the focus of numbering policy decisions, and how should Ofcom?s current decisions take these developments into account?: Ant number allocated to a company that provides a service to other companies such as, cardsave, technical help with computers etc should not be charged at premium rates. Enough consumers have to call so no need to charge ludicrous prices.

Question 4:Do you have any comments on Ofcom?s assessment of the current challenges to the Numbering Plan, in terms of a) number availability, b) transparency, or c) consumer abuses?: I think the numbers Ofcom have proposed are good people get used to different codes very quickly.

Question 5:Do you agree that the extension of conservation measures is the best approach to take before the impact of NGNs eases the pressure on geographic number demand?: I'm not sure

Question 6:Do you agree that the use of overlay codes is the best backstop approach in the event that extended conservation measures are not sufficient to meet demand for geographic numbers?: I'm not sure

Question 7:Do you agree that Ofcom should continue to respect the geographic identity of numbers until consumer understanding of the impact of technology change evolves further, and what do you consider is the best way to develop that consumer understanding? : Most people/companies these days know what different codes are and which ones are premium, they don't know as I didn't that most of the premium rates phones numbers have a different number you can ring that doesn't charge premium rates.

Question 8:Do you agree with Ofcom?s proposal to open a new ?03? number range for non-geographic, non-revenue sharing services? : Yes

Question 9:How should the ?03? range be structured, in terms of tariffs and services ?: if 03 numbers are used only for say 'helpline, authorisation of credit cards etc they should only be charged a certain amount per minute, yes maybe a bit more than standard but say no more than between 10-20p per minute and consumers should not be held on the line for ridiculous amount of time so the company makes money out of them.

Question 10:How should the ?08? range be structured, in terms of tariffs and services?: 08 numbers should only be used for free calls.

Question 11:Which broad approach should Ofcom take to structuring the ?09? range, and if a re-structured ?09? range is preferred how would you arrange the different types of ?09? services (e.g., according to price per minute, price per call, inclusion of adult content)?: Yes 09 numbers should be clearly shown as to how they charge, example 0901 would be no more than 50p a minute 0902 could be between 50-£1 per minute etc.

Question 12:Should any specific PRS service categories be identified or segregated in order that parents can block access by their children (e.g., sexually explicit content, gambling)? Is there merit in having a general ?adults only? classification, including a range of services to which access might be restricted on the grounds of content, or might consumers wish to apply different rules for different types of content?: All parents irrespective of their childs age should be able to simply block certain numbers.

Question 13:Are there any practical means by which the Numbering Plan could provide improved mobile tariff transparency?: It helps to know that calling from a mobile that if the number given is normally a free number from a landline that it may not be from a mobile, but I feel if it is a free number it should be free from a mobile aswell.

Question 14:Do you agree that personal numbers should have a tariff ceiling (or recorded message) to restore trust in those numbers? If so, what level, and should that ceiling include the cost of recorded messages? : I believe that people should not be kept hanging on for longer than 90 seconds and yes they should be aware of the cost, no they should not be charged for the recorded message.

Question 15:Do you agree with Ofcom?s proposals to move personal numbers (with the same consumer protection provisions) to the ?06? range and to pursue the direct allocation of numbers to end users as proposed at some point in the future?: I am not sure

Question 16:Do you have any comments on the use of the 05 number range?: If these are premium rate numbers it should be clearly stated.

Question 17:Do you agree that Ofcom?s overall proposals for a future Numbering Plan are coherent and comprehensive, and do you have any comments on the timescales in which the changes should be implemented ?: I think the proposals will be good and should be implemented as soon as possible.

Question 18:Do you agree with the principle of using consumer protection tests in numbering in order to limit consumer abuses, as long as the relevant legal tests are met? Do you have any suggestions for what tests would be appropriate or any conditions that should be met to pass such tests?: Yes

Question 19:Do you support the proposal to extend the tariffing provisions of the Numbering Plan so that they apply to customers of all providers on all types of network?: Not sure

Question 20:How do you think the new Numbering Plan could be effectively communicated to consumers?: Probably television advertising showing a web site people can use that explains in more detail.

Question 21:What are your views on Ofcom?s analysis and the different options for number charging?: So long as there is no room for abuse then it can only be good.

Question 22: Which, if any, numbers might appropriately be allocated using a value-based charge?: Not sure

Question 23:Do you have any other comments on Ofcom?s proposals for numbering as discussed in Section 5, or any other suggestions for how Ofcom might revise the current Numbering Plan or its administration ?: Just make it simple, easy to understand for the consumer to understand.

Question 24:What do you think of Ofcom?s proposed general approach to managing geographic numbers?: Good

Question 25:Do you have detailed evidence or suggestions on the variables likely to influence demand for geographic numbers, how those variables will change over time, and how Ofcom should develop a demand model?: Don't reallt understand the question.

Question 26:Do you agree with the specific proposal for how to extend conservation measures, including the extension to areas with a number shortage predicted in the next five (rather than two) years?: Not sure

Question 27:Do you consider there to be any upper limit, in terms of technical feasibility, on the number of areas in which conservation measures could be used ?: Not sure

Question 28:Do you agree with Ofcom?s assessment of the impact of conservation measures on stakeholders?: Not sure

Question 29:Do you agree that Ofcom should pursue these additional ways to improve number utilisation and, if we do, how would stakeholders be impacted and what practical issues are involved?: Not sure of question

Question 30:What are your views on overlay codes, and Ofcom?s assessment of them, as a fallback option to increase number supply? What should be the maximum number of areas where overlay codes are introduced?: Don't know

Question 31:What are your views on closing the scheme, and Ofcom?s assessment of it, as a fallback option to increase number supply?: Don't know

Question 32:What are your views on wide area codes, and Ofcom?s assessment of them, as a fallback option to increase number supply?: If I understand the question correctly, so long as any number clearly states what its charge is then thats fine.

Question 33:Might wide area codes be appropriate in regions with a strong identity and, if so, which specific regions are suitable for wide area codes?: Probably major cities such as London, Birmingham etc again so long as rates are clearly shown.

Question 34:Do you agree with Ofcom?s assessment of the problems with current 08 and 09 in terms of information clarity and consumer perceptions?: Yes

Question 35:Which of these options for current 08 services do you think is best in terms of a) increasing consumer transparency and b) minimising the costs of restructuring the 08 range?: Not sure

Question 36:How might early migration to the ?03? range be encouraged?: If I understand correctly the 03 numbers will be for what was premium rate lines if they mean to the consumer less cost then the sooner the better.

Question 37:Is it more important to indicate price per minute or price per call, and does this vary for different types of PRS service? What granularity of PRS tariff information should be given to consumers by the Numbering Plan?: Price per minute and also at the end of each call how much the consumer has been charged.

Question 38:Should there be any PRS number ranges with no tariff ceiling?: All PRS numbers should have a ceiling.

Question 39:What is the typical turnover of 09 numbers, and what does this mean for migration timescales to a new 09 Plan? How could Ofcom structure the 09 range or take other steps to promote voluntary migration of 09 services ?: Don't know

Question 40:Do you agree that that part of the 07 range which is currently unused (071-075) should be reserved for mobile services, with the aim of establishing 07 as a mobile ?brand??: Yes

Question 41:Should Ofcom reserve specific sub-ranges within the 071-075 range for new mobile multimedia services, in the interests of promoting consumer awareness and tariff transparency, and if so how?: most people know numbers starting with 07 are mobile phone numbers, consumers should be made aware that depending on the contract they have that ringing a mobile number from a landline could cost anywhere between 10-50P.

Question 42:Do you support the use of 100,000-number blocks in allocating mobile numbers to new mobile voice providers?: Don't really understand the question.

Question 43:Based on the above analysis, if Ofcom were to introduce a charge ceiling on calls to 070 numbers, which of the following levels should be adopted: Don't know

Question 44:Would a requirement to make tariff information clearly available to purchasers of personal numbering services at the point of sale, either in addition to, or instead of a call ceiling, be an effective means of providing tariff transparency on personal numbers?: Not sure

Question 45:If a new sub-range is made available for personal numbering services, how long should the current ?070? sub-range remain available for existing providers, in order to minimise migration costs ?: Not sure

Question 46:What issues do you think would need to be resolved before Ofcom makes individual numbers available for direct allocation to end users?: Not sure

Question 47: What do you consider to be the main strengths and weaknesses of the current rules-based system of UK number allocation?: Not sure

Question 48:Do you agree with these principles for number charging?: I think so.

Question 49:What are your views on Ofcom?s assessment of the issues to be considered in setting and reviewing number charges? For example, should other issues be considered in developing charging proposals?: Ofcom's assessment I think is good I think Ofcom to implement a ceiling of no more than 50p per minute for premium rate lines.

Question 50:Do you agree that charging for numbers could disincentivise economically inefficient behaviour, and incentivise economically efficient utilisation?: Not sure

Question 51:What internal changes would communications providers have to make, and at what cost, to support charging for numbers? Would these changes be preferable to earlier and more widespread use of conservation measures and (limited) changes to increase geographic number supply?: Don't know

Question 52:How might existing number allocation rules be reduced if charging for numbers was introduced?: Don't know

Question 53:What are your views on this illustrative charging mechanism, and would you suggest any changes or alternatives to it?: Don't really understand the question

**Question 54:How would charging for number blocks affect consumers ?:** Don't know

Question 55: What impact do you think charging for numbers would have on sub-allocation? Should Ofcom encourage or facilitate sub-allocation and, if charging were introduced, would changes be needed to the process of suballocation to facilitate trading?: Don't know

Question 56:Which types of consumer abuse do you think Ofcom should particularly attempt to address through its numbering policy decisions?: Any chat line that has a sexual content, gambling etc these line need to be monitored on a very regular basis and any abuse to the consumer, the company concerned should be made to pay.

Question 57:Which number ranges and types of originating communications provider do you think should be covered by an extension of the Numbering Plan?s tariffing provisions? What practical issues are involved, and how would this vary according to the number ranges and service providers involved?: Don't know

Question 58: What do you think of the potential conditions proposed by Ofcom for inclusion in a consumer protection test for number allocation, including the proposals that numbers should not be provided to anyone with a particular track record of persistent and/or serious consumer abuse?: Fair

Question 59:Are there any other circumstances in which it may be appropriate for Ofcom to refuse number allocations?: Any one requesting a new number be it a business or individual should be checked, certain questions asked ie have they ever been involved in any way with trading standards and what was the outcome.

Question 60: Would you support the use of a consumer protection test as a basis for withdrawing number allocations? What kind of considerations should Ofcom apply in any such test, and what would be the practical issues involved in applying such a test?: Not sure

Question 61:What consumer abuses do you think might occur in the future, and what steps might Ofcom take now in its numbering policy in order to reduce the potential for such abuses?: Individuals who constantly use premium rate lines and have run up huge bills should have a cut off point installed on their line so as to prevent further debt. They should still be able yo use their phone for non premium rate calls.

**Additional Comments:** As an everyday working person I found some of the questions quite hard and in some cases really did not understand them. My main point is alot of communication is done by either phone or computer neither should be at premuim rate, if say PC world has sold a computer and the customer needs to contact the helpline this should be charged only at local rate. The same applys to anyone having to call for authorisation of a credit/debit card the cost of this at present is very damaging for small businesses, it can mean the loss of the small profit they may have made.