



CABLE & WIRELESS

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Dear Neil,

Implementing decisions from the Numbering Plan

Cable & Wireless welcome the opportunity to respond to Ofcom's consultation on Implementing decisions from the Numbering Plan. Please find set out below the Cable & Wireless responses to the consultation questions:

Price ceiling for 070 numbers:

As set out in our response to the original Safeguarding the future of numbers consultation, we believe that a standard price ceiling of 20p per minute or per call is a suitable level. This provides enough margin on calls to mobiles within which a reseller of personal numbers may operate without requiring precall announcements for each call.

Option b is we believe overly complex and does little to address Ofcom's stated aim of achieving tariff transparency as the resulting tariff is practically meaningless to the consumer.

We acknowledge that the 070 range has very low consumer awareness and has experienced a substantial level of consumer harm. However we would ask Ofcom to explain the legal lever that allows the imposition of such a price ceiling upon non-SMP operators, especially where these operators have not been in any way involved in the consumer harm that has been identified on 070.

Cable & Wireless do not have any issues with the proposed implementation date of February 2007.

071 to 075 designation

Cable & Wireless agree with the proposed designation of these numbers as mobile services.

0300

We believe that the guidance and categories that have been provided for end user eligibility for 0300 are sensible. Cable & Wireless do however have some concerns regarding the suitability of 0300 and the potential confusion with 0800 and 0500. Ofcom have already stated that 0800 is a strong freephone brand with consumers. There is a risk that the use of 0300 for charities and public bodies will lead to the new range as being identified by consumers as a freephone number. Whilst 0800 may be a strong enough brand not to be adversely affected Cable & Wireless have strong concerns that the impact on 0300 and 0500 will be one of consumer confusion and that this will undermine the intention

of Ofcom to provide clear pricing transparency. We believe that the use of 0300 as the flagship to inspire consumer trust and confidence in the 03 range runs the risk of merely causing widespread tariff confusion amongst consumers.

Cable & Wireless would welcome further clarity on the processes Ofcom intends to implement around the allocation of 03 numbers. In particular we wish to understand how Ofcom intends to address the practicalities of ported numbers where customers are seeking to migrate 0870 and 0845 numbers to 0370 and 0345.

We would also like to comment on the practical arrangements for the issuing of geographic numbers that are outside of conservation areas. It is Cable & Wireless' understanding that these are to be allocated as 10k blocks but that operators will be restricted to using 1k levels. We believe that currently this is unworkable for those Communication Providers (CPs) which serve corporate customers with large DDI ranges. Cable & Wireless support the restriction of usage by 1k blocks and agree that (for new blocks rather than existing) Ofcom should be notified when the next level is being broken into for use. However we believe that it is unrealistic to expect the CP to await acknowledgement from Ofcom before this new level is used. This would make Ofcom a defacto part of the provisioning cycle and we do not believe this to be the intention nor for it to be desirable to Ofcom as it merely risks introducing end-user delays.

Yours sincerely,

Justin Hornby