

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title:

Telephone numbering Safeguarding the future of numbers

To (Ofcom contact):

Nic Green

Name of respondent:

Fabian Olins

Representing (self or organisation/s):

Self

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing

Whole response

Part of the response

Name/contact details/job title

Organisation

If there is no separate annex, which parts?

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION



I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and I authorise Ofcom to make use of the information in this response to meet its legal requirements. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

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Name

Signed (if hard copy)

Questions from Sections 1-5

Question 1: What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions?

I do not have a view

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?

Consumers want simplicity and what is now called "transparency" ie readily available information about costs of calls, if any, are to be incurred

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?

Technical knowledge insufficient to make a useful response

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?

It is still open to the unscrupulous to levy a charge for supplying information which should be free.

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 have no opinion on this.

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 do not understand the question

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?

If you mean the use of geographic numbers wherever possible should continue the answer is YES. The consumer is not generally interested in the technology and therefore should not be expected to "understand" technology change.

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

The logic underlying this proposal escapes me. The 08 range is non-geographic. All that needs to happen is to prohibit its use for revenue sharing or any other method of imposing additional call charges on the caller.

Question 9: How should the '03' range be structured, in terms of tariffs and services?

See above

Question 10: How should the '08' range be structured, in terms of tariffs and services?

See answer to Q8

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)?

I cannot answer this question as my interest in the 09 range is distinctly limited. If I am made aware in advance of the cost of a call I can decide whether or not to make it.

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?

There might be merit in the suggestion but I have no knowledge of how widespread the problem is.

Question 13: Are there any practical means by which the Numbering Plan could provide improved mobile tariff transparency?

I do not know. Surely this is what experts at such organisations as yours get paid large sums of money to determine.

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?

If a subscriber or end user chooses presumably for his/her convenience to adopt a personal number then he/she should bear the cost of providing the service.

Therefore my answers to your questions are.

Tariff ceiling YES

Level: FREE

Include recorded messages YES

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?

*If that solves a problem **and provided that the caller is not financially penalised.***

Question 16: Do you have any comments on the use of the 05 number range?

No

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?

No I do not agree for the reasons given elsewhere

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?

The only consumer protection test I am interested in are those which establish whether a caller is being made to pay an additional charge for making the call. By additional I mean additional to the charges already paid for in his package.

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?

I do not understand the question

Question 20: How do you think the new Numbering Plan could be effectively communicated to consumers?

Which new numbering plan?

Question 21: What are your views on Ofcom's analysis and the different options for number charging ?

I have already given my views – see answer to Q8

Question 22: Which, if any, numbers might appropriately be allocated using a value-based charge ?

What is meant by a "value based charge"?

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 ?

See answer to Q8

Detailed questions from Annexes 1-5

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

I have no views on the subject

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?

It is not my place as a subscriber to make forecasts of this nature

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?

I have no idea

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?

See answer to Q26

Question 28: Do you agree with Ofcom's assessment of the impact of conservation measures on stakeholders?

See answer to Q26

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 ?

See answer to Q26

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?

I do not understand the question.

Question 31: What are your views on closing the scheme, and Ofcom's assessment of it, as a fallback option to increase number supply?

See answer to Q26

Question 32: What are your views on wide area codes, and Ofcom's assessment of them, as a fallback option to increase number supply?

It is convenient for subscribers to be able to identify where a terminal is situated. Current area codes are helpful in this respect. Unless there is an overwhelming technical reason for not doing so, the current system should be continued.

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?

See answer to Q32. You cannot have a stronger identity than a town or area within a city

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?

NO

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 re-structuring the 08 range ?

I have already answered this question. See Q8

Question 36: How might early migration to the '03' range be encouraged?

Migration to 03 would not be necessary if 08 reverted to its original purpose which was to provide truly non-geographic numbering for those who truly needed it. These numbers should only be allocated to those who can prove a need ie have several departments all over the country which need to be interlinked to deal with incoming enquiries. Allocation of these numbers should be conditional upon callers not being made to pay supplementary charges for their use.

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?

This question misses the point which is that other than to premium lines which are avowedly moneymaking, no caller should be expected to pay for making a call over and above what he is already contracted to pay by his subscription.

Question 38: Should there be any PRS number ranges with no tariff ceiling?
See above

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 ?

Surely common or garden subscribers cannot be expected to answer such questions.

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'?

No comment

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 ?

No comment

Question 42: Do you support the use of 100,000-number blocks in allocating mobile numbers to new mobile voice providers ?

No comment

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

I do not understand the question

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?

I don't know

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 ?

I have no idea

Question 46: What issues do you think would need to be resolved before Ofcom makes individual numbers available for direct allocation to end users?

I don't understand the question

Question 47: What do you consider to be the main strengths and weaknesses of the current rules-based system of UK number allocation?

I can think of no strengths. At one time we had truly local and national rates. These were advertised in phone books etc. Now we have all-in packages but these mean nothing at all as the current system is a mess due to the proliferation of 08 numbers. The whole 08 scam needs to be scrapped. There should be only two tariffs viz:

One for all calls within the UK on fixed lines

A second for premium lines openly avowed and advertised as such with fully comprehensible charges.

Question 48: Do you agree with these principles for number charging?

What principles?

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 ?

All Ofcom has to do is to ensure that there are sufficient numbers available for the various types of service and to see that the consumer is not exploited by recipients.

Question 50: Do you agree that charging for numbers could disincentivise economically inefficient behaviour, and incentivise economically efficient utilisation ?

Possibly but this might not be to the benefit of the consumer.

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?

I do not know what this question means

Question 52: How might existing number allocation rules be reduced if charging for numbers was introduced ?

Surely this is not a question for consumers.

Question 53: What are your views on this illustrative charging mechanism, and would you suggest any changes or alternatives to it ?

I have no views on the matter

Question 54: How would charging for number blocks affect consumers ?

I don't know. Do you?

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?

I have no idea

Question 56: Which types of consumer abuse do you think Ofcom should particularly attempt to address through its numbering policy decisions?

Every question which permits me to do so I have answered in the same way.

Subscribers should not be obliged to pay supplementary charges for any landline call made within the UK other than calls to self acknowledged premium services.

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?

See Q56

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 ?

Obviously providers with a proven bad track record should be barred.

Question 59: Are there any other circumstances in which it may be appropriate for Ofcom to refuse number allocations ?

See above

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 ?

No comment

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?

Any allocation of numbers which is not specifically for premium use should be made on the basis that calls made on those numbers are to be included in packages.

Something has to be done about Patientline. The simplest way to deal with the problem is to permit the use of mobile phones in hospitals or to provide patients with cordless handsets for a fixed charge.

Additional Comments

As with previous consultations the “consultee” is overwhelmed by a surfeit of information much of it highly technical and couched in bureaucratic jargon most of which will pass over him if he bothers to wade through it at all. Maybe this is the intent or maybe it is a genuine, but failed, attempt to convey to the lay person the complexities with which Ofcom believes it is faced.

As a consultation exercise with the wider public it is a failure. The questionnaire is simply ghastly comprising 61 questions, many of them worded in such obscure language as to be meaningless. Presumably you are not expecting anything like the level of response that you got to your previous consultation. A cynic would claim that it has been specifically designed to put off all but those most determined to make their views known. Possibly this explains why to date (5th April), there are no responses posted on your website. On consideration, I wonder how you are going to publish the answers. Each one will take eight pages.

Even the response form is a mess. You provide a document titled “Responding to this Consultation” which invites responses as attachments but the document itself is designed to be forwarded complete as one would in an online order. Not only that but you appear to have adopted a format which is unable to reproduce apostrophes or quotation marks so that these appear as a jumble of symbols. A truly appalling piece of online literature.

If you do require an attachment as stated, why is there no easy link to the cover sheet and are you expecting your respondents to type out your questions again for the attachment. If not, where is the link to the form to be filled?

I have copied the complete document and made a Word file of it which I am sending as an attachment AS WELL AS YOUR COMPLETED ONLINE FORM. I hope you will receive one or both of these responses.

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