Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Telephone Numbering (Safeguarding the future of numbers)

To (Ofcom contact): Andy Montaser

Name of respondent: Mr Nick Cole

Representing (self or organisation/s): Self

Address (if not received by email):

CONFIDENTIALITY

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Part of the response	☐	If there is no separate annex, which parts?	

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Annex 10

Consultation questions

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?

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?

The use of non-geographic numbers (particularly chargeable) is a deliberate attempt at extorting money from callers. They negate the point of the all-in tariffs, and obviously generate income for both phone company and called company. They invariably maximise the on-line time by forcing people to sit through menus, explanations, marketing blurb and so on. They refuse to provide the conventional number associate with their address when pressed.

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?

Transparency must be maintained. Anybody using hidden/anonymous numbers must be obliged   to publish a standard telephone number as well.

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?

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?

The use of NGN to alleviate this pr`essure is a nonsense. The prefix 08... has less numbers available than does the full range of geographic numbers. It is an excuse to provide more effective fraud opportunities.

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?

Yes

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?

Understanding has nothing to do with it. It is the fact that NGNs are anonymous and allow multiple charging for all calls despite tariffs commonly used.

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

NO
08 should be scrapped as well

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

What is this? Questions without explanations are pointless and misleading.

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

Scrap it totally with the exception of 0800. Since nobody advertises that such calls incur a charge they are all acting fraudulently in exactly the same way that ATMs that charge are behaving illegally. There MUST be an alternative geographic number for callers to use as an alternative

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)?

09 is specifically set aside for charging purposes where a remote service is provided. They should not be used as an alternative for 08.. which arose only because fraudulent companies wanted a means of extorting money from people because 09 was known as a premium service.

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?

Yes

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

Mobile tariffs are totally non-transparent. The simple way would be to remove the cross-system charging regime. In the old days this was effective because specific and known dial codes applied to specific systems. However transparency and moving back to these (not enough numbers available anyway) would not be acvhieved in practice. Since this cannot happen then calls passed from one system to another should not be allowed to incur additional charges. The current system is nothing more than a way for companies to print money. Why is there such a cost when landline calls between different systems does not attract such disproportionate and hidden costs?

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?

Trust can only be achieved by removing the significant charge differences which actually bear no relation to the costs of providing the connection.

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?

No. Use it to extend the existing geographic number set.

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

Use it to extend the geographic number set.

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?

As soon as possible subject to removing the cost and charging anomalies which

allow the companies to maximise unwarranted income levels.

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.

That the costs are open and advised at the time of making a call. That full conventional geographic numbers are required to be made available and published alongside any premium or NGN number. Directory enquiries should NOT be allowed to hide numbers and addresses of companies and others using these anonymous numbering schemes.

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?

Question 20   How do you think the new Numbering Plan could be effectively communicated to consumers?
Question 21   What are your views on Ofcom's analysis and the different options for number charging?

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

None. Not necessary in the slightest. They are merely an excuse for telephone companies to extort money with no guarantee of providing any standard of service. It allows them to get away with considerable abuses.

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?

It is too complicated. Few people carry directories of information around with them or have access to them in any convenient format for reference.

Detailed questions from Annexes 1-5

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

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 waste the numbering range by allocating any to NGN or premium numbers.

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?

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?

In general it will be linked to the population. With a likely multiple per head of population. Technically with digital technology the only limits are the arbitrary restrictions placed during system design and programming on digit train length.

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

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?

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?

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

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

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?

Yes, those with the largest amount of number demand.

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?

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?

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

Start using it as needed to extend the availability of geographic numbers.

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 is visible, but masks the fact that many calls are per second. Price per call is only relevant if there is a fixed amount for any call.

either should be used depending on the basis of calls to that specific number.

Full visibility of actually what is being charged is the prime purpose.

Question 38   Should there be any PRS number ranges with no tariff 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?

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'?

It already is the mobile brand. That is what everybody knows it as. Whether personal or otherwise is immaterial. Number portability renders identifying carriers unworkable. With digital systems any call can be rerouted anywhere so there should be a central number allocating authority, who could then replace the myriad 118 etc systems with a single organisation as a consumer (and carrier company) benefit.

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, unless there is hidden differential charging involved.

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

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) 10 ppm ii) 15 ppm iii) 20 ppm iv) something else ?

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?

No. This would only work at time of purchase. After the event and following the inevitable tariff changes the actual figures would be lost.
Much of these issues exist only as a means for companies to generate huge incomes without consumers being aware of it.

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?

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

Force the telephone companies to work with each other and with a
focus on their customers rather than shareholders' (or directors') incomes.

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

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

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?

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

Not at all. In the days of mechanical devices this was partially true. Nowadays digital systems are not inhibited by physical constraints. If there is a demand for a number for a specific purpose then how can that be deemed inefficient? With the growth on tcp/ip delivery of voice services even local loop constraints will disappear.

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?

The biggest growth industry has been in the use of consultants advising change for changes sake. usually on a very rapid repetitive basis. Why should numbers be charged for. Use of a number is an embedded part of the account and facility which attracts a usage charge.

This is merely a mechanism to extort more money for the provision of nothing in reality.

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

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

Question 54   How would charging for number blocks affect consumers?

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 sub-allocation to facilitate trading?

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

Already discussed the hidden charges that

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?

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?

Good idea. Needs to be strictly enforced, and against named individuals not just company names .

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

If it wasn't necessary.

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?

Yes.

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?

More fraudulent use of services, attempts to extract money from people illegally. Intrusive calls.

Forcing people to pay for premium or high rate calls contrary to their tariffs. More hidden charging.

The potential for abuse exists BECAUSE of the use of 08/09/07 numbering. Unless there is a common call charge, regardless of end destination/carrier/purpose there will always be someone exploiting it at or beyond the boundary of acceptability.