

## **Response From Mr Raj Vara**

**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 non-geographic numbering scheme is getting too complicated and the pricing of calls to these numbers is now against the interests of consumers as seldom is the real cost per minute is known. Also most organisations are now only allowing connection to them via 087xxxxx numbers. It should be noted that the difference in pricing per minute of an "0870" and "0871" is huge.

Also, telcos market "All Inclusive telephone line rental" packages but then in small-print explicitly exclude non-geographical number - HOW can these be "ALL INCLUSIVE" then?? This is mis-representation of the service.

**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? :**

**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? :** Ofcom current assessment is now obsolete. Telco firms have exploited the various loopholes (e.g All Inclusive telephone line rental, hugely different price per minute for 0845, 0870, 0871, etc numbers) that transparency is completely eroded. Several firms are now refusing to divulge their normal geographical numbers - technically lying - by saying those numbers are not available now.

**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?:**

**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?:**

**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? :** YES - it should further ensure that there all firms supply a corresponding geographical number as well.

Best way to develop consumer understanding should be along the lines of ATM cash machines whcih tell you at the outset the charges that will incurred prior to use of the service - All companies using non-geographical numbers should explain at the beginning of the call the cost per minute of using that number and allow the caller to decide whether to continue.

**Question 8:Do you agree with Ofcom's proposal to open a new 03 number range for non-geographic, non-revenue sharing services? :** NO - this will complicate the telephone number scheme even more so. The current abuse and exploitation of non-geographic numbering should be resolved (in favour of the public in terms of transparency primarily)

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

**Question 10:How should the 08 range be structured, in terms of tariffs and services?:** Close the loopholes around cost per minute and revenue sharing - apply a higher taxcharge to both the subscriber and the telco on the initial setup and ongoing income derived from the number.

**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)?:** Price per call.

**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 absolutely - isnt this a basic right for all - To have a choice ??

**Question 13:Are there any practical means by which the Numbering Plan could provide improved mobile tariff transparency?:** All teloc should explain at the beginning of the call the cost per minute of using that number and allow the caller to decide whether to continue.

**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? :** YES and this should ZERO cost - after which the caller can decide is they wish to continue using the service and accept the subsequent cost.

**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 - this will complicate the telephone number scheme even more so. The current abuse and exploitation of non-geographic numbering should be resolved (in favour of the public in terms of transparency primarily)

**Question 16:Do you have any comments on the use of the 05 number range?:** NO to its introduction - this will complicate the telephone number scheme even more so. The current abuse and exploitation of non-geographic numbering should be resolved (in favour of the public in terms of transparency primarily)

**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 - they can only be coherent and comprehensive if current issues and shortcomings are resolved and all usage loopholes are closed.

Telco "All Inclusive telephone rental packages" to treat non-geographical number same as geographical numbers.

**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.

If a corporation is making a profit than they should not be allowed to use telephone numbers that incur a charge to use more than a local call.

**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 would support a UNIFORM approach.

**Question 20:How do you think the new Numbering Plan could be effectively communicated to consumers?:** I would recommend that all schools include a voluntary lesson on telephone numbering scheme, cost per minute for various designations would be a GOOD start. At least, the future users of the services will well informed unlike their predecessors who have been exploited.

**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 ?:**

**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 ?:**

**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?:**

**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 ?:**

**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?:**

**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?:**

**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?:**

**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??:**

**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 ?:**

**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:**

**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?:**

**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?:**

**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 ?:**

**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?:**

**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 suballocation to facilitate trading?:**

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

**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 ?:**

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

**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 ?:**

**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?:**

**Additional Comments:**