<u>**Response From Telephone Helplines Association**</u>

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? :

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? :

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? :

Question 8:Do you agree with Ofcom?s proposal to open a new ?03? number range for non-geographic, non-revenue sharing services? : THA supports the introduction of a new 03- range where revenue share is not permitted and call costs are linked to that of the geographic 01- and 02- numbers. However, confusion may arise during any transition period between one system and another, so it may be useful to consider systems that minimise disruption, such as in Option 3a (e.g. converting existing 0845 numbers to 0345 numbers for services that wish to migrate).

Question 9:How should the ?03? range be structured, in terms of tariffs and services ?: Much of the current confusion about 084- and 087- numbers arises because the local and national cost distinctions do not apply to mobile networks and have almost disappeared for the majority of landline users whilst the associated terminology carried on in relation to non-geographic numbers.

In the longer term, it would seem sensible to abolish any distinctions between 'local' and 'national' call rates and to encourage providers to set their own standard rate for all numbers in the 01, 02 and 03 ranges. Whilst the 03 range may accommodate both 034- and 037- services migrated from their existing 084- or 087- numbers (Option 3a), these need not be charged differently (Option 3b).

We think it is important that linking 03- numbers to geographic rates must also apply to calls from mobiles and payphones. If there is no difference between calling an 020 and an 03- number from a fixed line network, there should also be no difference when calling from a mobile or payphone network, further avoiding any confusion.

We think it is also important to preserve the availability of call traffic statistics on 03-numbers to organisations that receive calls on these numbers, even if the organisation is not being charged to receive the call (as they currently are with 0800 or 0845 calls). Our members tell us that this data is crucial for monitoring and developing their services.

Question 10:How should the ?08? range be structured, in terms of tariffs and services?: THA agrees that the place of the 080- range in the numbering scheme should be retained. We feel that the public description 'freephone' is misleading as, unlike in most other EU states, most UK mobile networks charge standard rates for calling most 'freephone' numbers. Through partnership work, THA has been able to ensure that these charges to some freephone helpline numbers are waived by some mobile networks - this not only increases accessibility but also adds confidentiality as the calls are not itemised on paper bills. However, THA recognises that these services are a very small proportion of 0800/0808 numbers. In a context where an increasing proportion of calls are made from mobiles, we question the longer-term use of the description 'freephone' as long as the mobile networks charge users for calling any of these services.

We think the proposal to have increased prices as you move higher up the 08- number range is sensible.

We suggest that this gradation should also be reflected in payphone pricing structures. Many helplines operate services on 0845 numbers that may be called from payphones by users in vulnerable situations, but at present, there is no distinction in charges between calling an 0845 and an 0870 number from a BT payphone, with a 10-minute call costing £1.20. Current payphone interiors do not display charges for 0845 calls, nor are these identified in a pre-announcement. THA recognises the additional cost of maintaining the payphone network but feels the current charges are excessive.

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)?: THA would like to respond only to a specific proposal made by Ofcom for a fundraising range such as 092. This is similar to a suggestion we made for the NTS consultation.

We proposed a 'give-as-you-talk' number range that is specific for charities as this would allow some organisations to provide services that would otherwise be beyond their means, as long as a free-to-caller pre-announcement would indicate the costs and explain that these costs were contributing to the good cause concerned. We therefore welcome a Ofcom's proposal.

We have had feedback from our members, however, that to use the a sub-range within 09 to do this may lead charities to be perceived as falling into the same category as

'premium' or 'adult' services, which may give rise to public distrust.

We think it would be more appropriate to open up a new sub-range within 08-, such as 081-. THA would be well-placed to have an involvement with Ofcom in co-ordinating such a sub-range in the same way as we have done with the 0808 80-range.

We also think it may be worth exploring differential number ranges for SMS shortcodes that link back to the voice service number ranges. For example, if 092 were used for charity voice services, then a number range 92xxx could be used for charity SMS services.

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?:

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

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? :

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?:

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

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 ?:

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?:

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 ?:

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: