

## **Response From Mr Geoffrey Towler**

**Question 1:What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions? :** This area is not clear. Particularly in addressing how the non-geographic numbers are going to be dealt with. The need to provide price parity with the geographic numbers. Need to demonstrate the removal of revenue sharing schemes.

**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 customers' views are almost non-existent or generated by ignorance. The telecom operators do not overtly publish the tariffs for non-geographic calls such as 0845 and 0870 numbers. The public are not aware that there is any revenue sharing between the telecom operator and the commercial organisation using the non-geographic number. It is a case of you scratch my back and I will scratch yours. These non-geographic numbers are tattermount to premium rate numbers in disguise.

**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? :** I have no views but technology should make most things possible.

**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? :** No

**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?:** No comment. Not sure what you mean.

**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?:** No comment

**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 I agree. No views on the best way to develop the 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? :** I have no objection to the proposal but see no need for it if the existing non-geographic numbers such as 0845 and 0870 have the revenue element removed and the charging tariff has parity with the 01 and 02 numbers.

**Question 9:How should the ?03? range be structured, in terms of tariffs and services ?:** The changes in 8 I propose would remove the need for an 03 structure. If

an 03 structure comes in it should have absolute parity with the 01 and 02 structures and there should be no revenue sharing with the organisations that hold the numbers.

**Question 10:How should the ?08? range be structured, in terms of tariffs and services?:** In this day and age there is no justification to have 0845 and 0870 numbers based on local and national rates. On my geographic tariff I am charged the same to phone the tip of Scotland as I am to ring my local doctor and this is how it should be for the non-geographics. The 0845 and 0870 numbers have grown like a cancer throughout the commercial organisations and one cannot ring one's bank, building society, insurance company, credit card company, travel company etc with having to use these numbers. Invariably it is during Mon to Frid 9am to 5 pm that one has to use these numbers most frequently at peak rates that can cost two times, four times or even ten times the cost of the 01 and 02 geographic numbers. The companies who use these non-geographic numbers often create deceit by informing their customers that "this call is only being charged at the local rate".

**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)?:** No comment

**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 restructuring the 08 range?:**

**Question 36: How might early migration to the 03 range be encouraged?:** There will be no incentive for many operators to move to the 03 structure if they can still receive revenue from the 084 and 087 structures. This revenue must be done away with and the new simplified 03 structure that does not need to make false claims about local and national use could be introduced as a unified structure provided that it has tariff parity with the 01 and 02 geographic structures. Revenue sharing must be banned from this structure.

**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?:** The main type of consumer abuse Ofcom needs to address through its numbering policy decisions is how the non-geographic numbers such as 0845 and 0870 are being used like "mini-premium rate" numbers without the regulatory protection of the premium rate service. The public do not know in the main that these numbers are revenue earners. The consumer association gives any of its callers the choice of calling a non-geographic number or a 01/02 number. Perhaps such a choice should be mandatory. There is something immoral about an organisation that keeps someone on hold and play them music whilst receiving revenue for the privilege. An example of when I had to ring a travel company to change a flight booking I had to ring an 0870 number where I was holding on for about an hour whilst they played me music of fly me to the moon. This cost me £5.60 per hour including VAT. After about one hour when I eventually got through I spoke to the clerk for about 30 seconds then I was cut off and had to redial and listen to music for another hour at £5.60 per hour.

**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:**