

## **Response From Mr EJ Woodhouse**

**Question 1:What are your views on the strategic principles that Ofcom proposes to apply to its numbering policy decisions? :** The strategic principles are sound. I support them.

**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? :** Customers are confused by the varying charges around 08 numbers, and consequently annoyed by unwittingly being charged heavily for 0870 numbers, when other 08 numbers are either free or cheap. I am not convinced that Ofcom's proposals address this fully. Now that 03 numbers are to be brought in (if the other proposals are accepted), it might be better to consider having all 08 numbers free, and all 09 numbers charged, with 090 charged cheap (at say current 0845 rate), and then an increasing banded system up to 099 (or maybe 098) for increasing charge rates of the other 09 numbers. That would seem more logical to me than having some 08 numbers free and others charged. Most people do not understand "premium rate" - all they would need to know, under my suggestion, is that anything that began with 09 would cost, and the bigger the number after the 09, the more it would cost. Anything that began 08 would be free. An alternative (possibly in addition to the foregoing) would be to have different areas of the new 03 range charged at geographic local or geographic national rates, and keep all 08 free and all 09 higher cost charges.

**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? :** The most likely technological changes seem to me to be around the impact of merging mobile technologies. This may happen by a device being a cordless in a house, and a cell-phone when out and about. People will want to blur the distinction, and so your 06 and 07 proposals seem sound to me, since these options will facilitate this. The other likely area of radical change will be the increased use of internet telephony, and I think your 06-range proposals should facilitate that.

**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? :** a) No - I support the proposals  
b) See above.  
c) No - I support the proposals

**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?:** Yes, although I can see some large businesses being irritated by having to use non-sequential number groups.

**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, but it's not very good. I suppose it must be better than a complete renumbering exercise ("01 day" all over again!).

**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.**

Consumer understanding would most easily be developed by ensuring maximum simplicity and transparency of the proposed scheme, and heavy support marketing - cf "01 day".

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

**Question 9: How should the 03? range be structured, in terms of tariffs and services? : 031 to 033 - very cheap**

034 to 036 - (real) local rate

037 to 039 - (real) national rate

**Question 10: How should the 08? range be structured, in terms of tariffs and services?: All 08 free. See second alternative answer to Question 2 above.**

**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)? : See above. I would favour a price per minute.**

which increased with the increasing x in the 09x number. I can see some advantages in being able to identify adult content from the number itself, but charging identification seems to me to be more important, coupled with some technology to prevent unauthorised use of any 09 number on a phone (either handset or calling line or both).

**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? : Difficult area. I think on balance that the ability to restrict access to all 09 numbers would be enough (see Q11 answer).**

**Question 13: Are there any practical means by which the Numbering Plan could provide improved mobile tariff transparency?: I can't think of anything that wouldn't be too complicated, so I guess the answer is No.**

**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? : Definitely. I would set the ceiling at national geographic rate - if anyone wants more, they go to 09. Recorded messages about the cost of calls (on any number) should be excluded from the charge to the caller. Other recorded messages should be part of the call. I think.**

**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?:** By and large, Yes, I do agree, although I would need convincing that Ofcom's proposed direct allocation process was efficient.

**Question 16:Do you have any comments on the use of the 05 number range?:** Not really, unless a complete renumbering was carried out. Could it be used to facilitate internet telephony? And what about the 0500 numbers?

**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 ?:** Yes, they are coherent and fairly comprehensive. I would move sooner rather than later, but support changes with heavy marketing.

**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 I do agree, and No I don't feel able to suggest appropriate tests. There are better people than I to develop this area.

**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?:** Definitely.

**Question 20:How do you think the new Numbering Plan could be effectively communicated to consumers?:** TV adverts, leaflet to every house, newspaper adverts, etc, etc.

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

**Question 22:Which, if any, numbers might appropriately be allocated using a value-based charge ?:** In my suggestions above, perhaps 030 numbers, or 090 numbers.

**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 above.

**Question 24:What do you think of Ofcom's proposed general approach to managing geographic numbers?:** By and large - OK

**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?:** No. This is a complex demographic issue.

**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?:** Yes, although reluctantly.

**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?:** I don't know - probably not, but it's a poor show.

**Question 28: Do you agree with Ofcom's assessment of the impact of conservation measures on stakeholders?:** Yes - I think it's all there.

**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?:** Yes, you should, but there will be a whole bunch of fed-up consumers. They may blame you, so the sooner the grand plan comes into force, the better.

**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?:** A necessary evil, to be introduced to the minimum necessary number of areas.

**Question 31: What are your views on closing the scheme, and Ofcom's assessment of it, as a fallback option to increase number supply?:** No. Ofcom needs to keep an increasing grip.

**Question 32: What are your views on wide area codes, and Ofcom's assessment of them, as a fallback option to increase number supply?:** I think I rather like this option, but I can foresee difficulties.

**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?:** Most regions could handle this quite successfully. Just make sure there's a line drawn down the Pennines, and another from the Wash to the Severn estuary!

**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?:** Yes. to a certain extent. See previous answers.

**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?:** See previous answers above.

**Question 36: How might early migration to the ?03? range be encouraged?:** Discounts.

**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 is a question for the providers. The issue around per minute of connection, or per call

made, or per month of facility available, is a marketing issue. I would like to see a granularity level as described above for 03 and 09 numbers.

**Question 38:Should there be any PRS number ranges with no tariff ceiling ?:** No

**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 ?:** See above.

**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'?:** Yes

**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 ?:** Probably, and in the same way as described above, ie 071 cheap, 075 expensive, linear in between.

**Question 42:Do you support the use of 100,000-number blocks in allocating mobile numbers to new mobile voice providers ?:** Yes. Although there is some advantage to knowing, in general, which provider owns 07abc (which implies 1,000,000 blocks), this advantage is likely to erode fairly quickly, so a more number-efficient allocation process would be better.

**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:** No comment.

**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?:** It would be a necessary but not a sufficient requirement.

**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 ?:** 12 months

**Question 46:What issues do you think would need to be resolved before Ofcom makes individual numbers available for direct allocation to end users?:** Fairness, transparency and efficiency of allocation process.

**Question 47:What do you consider to be the main strengths and weaknesses of the current rules-based system of UK number allocation?:** It works pretty well, but it's complex and confusing.

**Question 48:Do you agree with these principles for number charging?:** n/c

**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 ?:** n/c

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

**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?:** These measures would certainly be preferable. Telcos wouldn't like it, but too bad.

**Question 52:How might existing number allocation rules be reduced if charging for numbers was introduced ?:** Smaller blocks of allocation.

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

**Question 54:How would charging for number blocks affect consumers ?:** Ofcom would need to keep a careful eye to ensure that this wasn't used as an excuse for a price hike.

**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?:** Ofcom I think should encourage this. My only concern is for large organisations needing a large block. The trading of numbers would happen anyway.

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

**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 previous answers. I can see no significant reason not to be much more inclusive with the provisions.

**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 ?:** n/c

**Question 59:Are there any other circumstances in which it may be appropriate for Ofcom to refuse number allocations ?:** Previous inefficient sub-allocation.

**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?: n/c

**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?: n/c

**Additional Comments:** I have some concerns over Ofcom's potential implementation difficulties. (1) Will Ofcom ensure that telephone providers include the new 03 range in any inclusive minutes and therefore free? (2) Will Ofcom ensure that companies that are using the Personal (follow-me-anywhere) 06 numbers to gain revenue (eg stealth premium rate) are made to move to relevant 09x numbers that were specifically designed for this purpose? (3) Will Ofcom ensure that hidden premium numbers (as in 0870 and, to a lesser extent, 0845) are, in the new scheme, more transparently charged?