



BT's response to Ofcom consultation on  
Increasing the Supply of Reseller Identification Codes  
(RIDs)

Non confidential version

28 November 2014

## **BT Summary**

While Ofcom's foresight in looking at the possibility of a lack of RIDs in the future is to be supported, we do not believe that there is sufficient evidence for a change to be made to the existing RID format at this stage. We therefore support option 1 – No change to the current RID format.

As a first step we recommend that Ofcom introduce greater rigour into the management of RIDs i.e. more efficient use of the RIDs that have already been allocated and ultimately to ensure that the allocation process recognises that RIDs are a scarce resource.

Should new evidence for the need for an increase in RIDs come to light as a result of the consultation process, or from Ofcom's future plans, then we would support option 2 (extend RIDs to a three character alphanumeric format) over option 3 (extend RIDs to a four character alphanumeric format). In addition, prior to implementing option 2, we would need a) a minimum of 12 months notice and b) an assurance that existing three character alphabetic RIDs be kept unchanged even if there is a change to a new format of three character alphanumeric RIDs.

We have provided more detail in our answers to the consultation questions below.

## **BT Response to Consultation Questions**

*Question 1 – What is your estimate of the number of RIDs that will be required by your downstream CPs who contract with end users, at the harmonisation date of 20 June 2015?*

[REDACTED], but the current number of RIDs registered on the Ofcom website at approximately 3.6k out of a theoretical maximum of 15.6k, means that there are large numbers of RIDs available and therefore there is no short-term likelihood of a shortage of RIDs

*Question 2 – What is your estimate of the total number of RIDs that will be required by the industry at the harmonisation date of 20 June 2015? On what basis have you reached this estimation?*

Aside from the information provided in our response to question 1, we are unable to answer this question.

*Question 3a – Do you agree with our proposal to increase number of RIDs by changing the format of the code to a three character alphanumeric code, as per option 2?*

We recognise Ofcom's foresight in considering whether there will be a shortage of RIDs in the future. However we do not believe that there is sufficient evidence provided in the consultation to currently support a change. Therefore we do not support Ofcom's proposal. Our preference is for option 1 ie. No change to the current RID format.

However we do recommend that there are steps Ofcom could take to increase the availability of RIDs. For example, by recycling RIDs which are no longer required, eg those that were allocated to entities which have been taken over or have gone out of business. Ofcom should also encourage CPs to assess the use of RIDs by sales channels and/or brands that are no longer active.

Should there be clear evidence that there is going to be a RID shortage then we would support option 2 over option 3. The cost of developing an additional character space that is proposed in option 3 is significantly more disruptive for all CPs and therefore is not a feasible option.

If option 2 is required then due to the level of system change and testing required we would need a minimum of 12 month notice prior to the implementation of the new format.

Furthermore we would also request that under option 2, CPs who already have RIDs can retain them in the same format and not have to change to an alphanumeric format. This ensures that the current use of RIDs could be extended without unduly disrupting the existing CP processes.

*Question 3b – Please provide us with an indication of the scale of costs that Options 2 and 3 would entail ?*

We have had insufficient time to assess the costs for implementing Options 2 or 3.

*Question 4 – Are you aware of any other administrative purposes for which a three character alphanumeric code might be required or useful?*

We are not aware of any other use at this time but we would also like to highlight to Ofcom that the impact of any change to the use of RIDs affects existing products that are not within the scope of the Consumer Switching workshops. RIDs were introduced to help identify the CPs as part of Wholesale Calls and CPS products provided by BT Wholesale. However, although these products are not within the scope of the Consumer Switching workshops [✂] So any future change to the layout of RIDs would need to specifically take account of the cost of changes to the systems supporting wholesale calls and CPS. We have no specific estimate of costs but we believe the timeframe to implement any changes would be in excess of 12 months.

*Question 5: Do you have any comments on the proposed modifications to the Numbering Plan set out in Annex 3?*

For the reasons set out in our answer to question 3a, at this time we do not support the proposed modification to the Numbering Plan to change RIDs to a three character alphanumeric notation.

*British Telecommunications*