

Nicola Humphrey
Office of Communications
Riverside House
2A Southwark Bridge Road
LONDON
SE1 9HA

7th November 2014

By e-mail

Reference: Increasing the supply of Reseller Identification Codes (“RIDs”), Proposal to modify the National Telephone Numbering Plan to change the format of RID administrative codes (the “Consultation”)

NON-CONFIDENTIAL

Dear Nicola,

Gamma Telecom Holdings Limited and its subsidiary companies (“**Gamma**”) welcome the opportunity to respond to this consultation published on 27th October 2014; our confidential response is appended.

Introduction

Gamma is a Network Operator that provides wholesale fixed and mobile telephony and data services, mainly to resellers who sell to the Small to Medium Enterprise sector throughout the UK. Gamma has a turnover c£149m per annum.

This consultation response relates to Gamma Telecom Holdings Limited and its group companies. Any conflict between the implied position of Gamma in any UK Competitive Telecommunications Association (UKCTA), Internet Telephony Services Providers Association (ITSPA) or Federation of

Communication Services (FCS) responses is accidental and we consider that our views in this response should prevail.

Given the brief nature of the Consultation, we have responded in general terms only. Gamma trusts that this response addresses the questions posed by the Office of Communications (“Ofcom”) and would welcome the opportunity to elaborate on any points in more detail if required. Please don’t hesitate to contact me, ✉ for further detail in the first instance.

General Comments

Gamma would be surprised if the number of RIDs increased from 3,264 as at 15th October 2014 to a point of constraint within the 15,625 ceiling as a result of the contemporaneous changes to the switching regime. It would seem to suggest that there would be, using the postulated figure of 20,000 RIDs, some 16,700 broadband only communications providers currently in existence in the UK, who would utilise their own RID and not that of their lead network or dealer. We note that the changes to the General Conditions of Entitlement to support the switching do not mandate that the Public Electronic Communications Service (“PECS”) with the contract with the end user submits a RID, merely that Ofcom can track which it is – this can be done via the operator whose RID was submitted as opposed to the actual supplying entity.

In fact, Gamma is aware of some Communications Providers that have a competition and confidentiality issue with exposing the identity of their base to British Telecommunications plc (“BT”) through the RID and that this has been raised with Ofcom; this in turn will act as a natural constraint on the growth of their use.

However, assuming that the extrapolation of use is true, then changing to a three digit alphanumeric code is the least intrusive change for our systems, and we would suggest, as a point of general system design, probably the least for all communications providers. The resulting increase of numbers should be sufficient for considerable time, even if a RID were allocated to all PECS regardless of the scope (or not) of their interaction with BT Openreach and does not prejudice an extension to four digits later.

Incidentally, a true alpha-numeric structure, e.g. 1AA, A1A, AA1 is 46,656 - the approximation of 40,000 for Ofcom’s Option 2 doesn’t make it clear whether Ofcom intends all characters to be alpha or numeric or just the trailing ones.

Yours sincerely,



Peter Farmer,
Commercial and Regulatory Manager,
Gamma Telecom Holdings Limited