

Additional comments:

3rd Sept 2014

Attention: Samir Prakash, Ofcom.

From: [X]

Dear Sirs,

Ofcom consultation on “The 03 Number Range Revenue Sharing”

I am managing director of [X].

I have looked at what you are proposing and I understand from your executive summary and that you appear to be asking for impact assessment if your proposed changes are adopted, I am opposed to the proposed changes.

[X] are a UK based List Broking Company and we have for clients sourced databases of people who ring abroad taking advantage of cheaper international call cost services. This market has really been created by the Mobile Networks charging from £1 to £1.50 per minute for an international call from the UK. The companies we supply data to take advantage of this outrageously high pricing to create a market for calling card and digital calling card international services charging typically 5 to 10ppm for international calls, which is great value .

Therefore by implication, by either limiting the volume of allowed calls to 03 numbers from a consumers mobile telephone either directly or indirectly, you are going to devastate the digital calling card market. This will have no benefit for the consumer as they will no longer be able to call back home to their home countries cheaply left only with the option of using the Mobile Networks service with a mark-up of 1000+%.

I therefore urge Ofcom not to modify the restrictions on the use of 03 numbers and certainly not to include the words “benefit indirectly” in any rewording.

Yours sincerely

[X]

Question 3.1: Do you agree that the modification to the Numbering Plan that we propose ? which would prohibit direct or indirect revenue-sharing with callers and/or end-users by those who use 03 numbers ? is appropriate and proportionate to address the conduct of concern that we have described in this document? If not, please explain why.:

I do not agree - this would disadvantage my company and my clients from offering services that are good value to the british consumer and drive traffic to the mobile networks at higher rates.

Question 4.1: Do you have any comments on the draft modifications to the Numbering Plan that we are proposing, as set out in Annex 7? Where you disagree with any of the proposed modifications, please explain why.:

I disagree wiioth the changes for reasons given in my comments letter sent with this response. "Indirect" is meaningless in this context and will bring about a lot of disputes and referrals to ofcom.