

## **Additional comments:**

### Suggestion:

"Termination rates for '03' calls should be precisely the same as termination rates for geographic calls."

### Comments:

If it truly costs more for a CP to terminate a '03' call than a geographic call then recovery of this cost should be a matter of commercial negotiation between the subscriber with the '03' number and their CP.

When performing any cost-based analysis to decide whether to adopt an '03' number (instead of or in addition to a geographic number) the Subscriber would no longer be able to ignore the additional costs involved - that have previously been 'swept under the carpet' as not being a direct cost to the Subscriber.

If, at some future date, revenue sharing on geographic numbers becomes prevalent (which is possible) then Ofcom could enforce a reduction in the termination rate, for all CPs.

**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 agree that the conduct of concern needs to be addressed.

I suggest that there is a much simpler way to deal with the problem - see my 'Additional comments'.

**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 am concerned that the proposed modification would be difficult to enforce - particularly with the difficulties of defining indirect revenue and with associating 'Calling Party' with specific parts of the revenue.