



Stamatia Papadopoulou  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
LONDON  
SE1 9HA

2<sup>nd</sup> April 2014

By e-mail

**Reference: Managing Northern Ireland telephone numbers. Proposals for number conservation measures in the 028 area code and additional local numbers for Belfast and Londonderry (the “Consultation”)**

**NON-CONFIDENTIAL**

Dear Stamatia,

Gamma Telecom Holdings Limited (“Gamma”) welcomes the opportunity to respond to this consultation published on 1<sup>st</sup> April; 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£145m per annum.

This consultation response relates to Gamma Telecom Holdings Limited and additionally represents the views of our reseller subsidiary Gamma Business Communications Limited (formerly incorporated as Uni World Communications Limited) and our network specialist subsidiary, Gamma Network Services Limited (formerly incorporated as Varidion Limited). It does not represent the views of any other group company unless otherwise expressly stated. 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 limited scope of the consultation and our previous position we have chosen to respond in general terms. 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 concurs with Ofcom’s conclusion that the 34 area codes identified in Figure 1 of the Consultation are designated as Conservation Areas as well as the assigning of the additional 2 digits in Belfast and Londonderry.

This is entirely consistent with Ofcom’s previous approaches to handling constraint within the United Kingdom and does not prejudice further, more invasive, action later on should demand continue to be constrained as we have seen successfully managed in other parts of the country.

We have no comments on the proposed modifications to the National Telephone Numbering Plan.

Yours sincerely,

[✂]

Peter Farmer  
Commercial and Regulatory Manager  
Gamma Telecom Holdings Limited