



## **Virgin Media's response to Ofcom's consultation on Managing Northern Ireland Telephone Numbers**

Virgin Media welcomes the opportunity to respond to Ofcom's Consultation on managing the supply and demand for Northern Ireland numbers (the "**Consultation**").

Virgin Media has already set out its views previously on Ofcom's proposals and therefore reiterates its comments made on 13 September 2013. In addition, Virgin Media highlights its previous concerns that the efficacy of Ofcom's proposals to charge for numbers in conservation areas must be viewed in light of the fact that the system of charging Ofcom has adopted applies regardless of whether the CP has efficiently allocated the number to an end consumer. Such a blanket policy is unlikely create the right incentives and therefore bring about efficiencies in the market and better use of numbers.

Specifically, Ofcom's proposals in relation to Northern Ireland are to:

- Introduce conservation measures in all 34 Northern Ireland areas; and
- In Belfast and Londonderry increase the supply of numbers by adding a further two-digit range for local numbers in each area: 028 96 for Belfast in addition to 028 90 and 95, and 028 72 for Londonderry in addition to 028 71.

Whilst we acknowledge that Ofcom's proposals could, from a theoretical standpoint, be regarded as a logical response to the challenge of managing geographic numbers, we reiterate the practical difficulties that providers, including Virgin Media, will face in implementing these measures. In short, our strong preference is that Northern Ireland is not classified as a conservation area, especially as there seems to be alternatives which will have less impact on CPs. These have not been considered in the Consultation.

From Virgin Media's perspective, it would be preferable, for significant economic and technical reasons, to retain a spare transit layer decode capacity where the case for conservation measures is far more compelling. However, this option is not included within Ofcom's proposals and therefore not properly considered, despite our concerns being flagged in September 2013.

[Confidential]

**Virgin Media**

**May 2014**