Vodafone Response to Ofcom Consultation:

Managing Northern Ireland telephone numbers

Vodafone welcomes the opportunity to comment on Ofcom's proposed evolution of telephone numbering in Northern Ireland. We believe that Ofcom has got the strategy right, namely:

- In areas where there is demand for additional number ranges, predominately driven by CPs wishing to provide coverage, introduce conservation measures hence allocating in 1k blocks, and
- In areas where there is demand for additional numbers (i.e. Belfast, Londonderry), also open up additional two digit levels (i.e. level "BC" digits) to expand supply.

The proposals – particularly the further expansion of 1k levels – are not pain free for Communication Providers (CPs) such as Vodafone. Whilst the majority of CPs default route much of their traffic to a transit provider, CPs with extensive footprint and connectivity must break out all number ranges in our switch databuild to route to the correct terminating CP. As Ofcom knows all too well, this databuild table space is finite, and on legacy equipment not readily expandable. However, Vodafone acknowledges that greater usage of 1k routeing is the lesser of a series of evils, and so on balance supports the proposals. We believe that Ofcom could mitigate the likely impact by:

1. Issuing new 1k blocks from unused 10k blocks, rather than reclaiming 1k blocks from existing 10k allocations and re-issuing them.
2. Intelligently issuing 1k blocks. In particular;
    a. Where a CP with an infrastructure presence requests a 1k block, if they indicate that there will be subsequent applications, a 1k block from a clean 10k should be allocated, subsequent requests allocated from the same 10k allocation, and that 10k (internally to Ofcom) "reserved" for that CP until such a time that the spare 1k levels are the only way of fulfilling demand by other CPs.
    b. Conversely, where a CP without infrastructure requests a 1k block for "coverage" reasons, these should be allocated from a 10k block used for other similar CPs.

Vodafone realises, of course, that such mitigation will only be possible while there are sufficient 10k blocks to achieve this. However, for that period, it will mean that those CPs that need to break out databuild for each destination CP will be able to do so more efficiently – in the case of terminating infrastructure CPs at the 10k level, and in the case of internet-based CPs generically at the 10k level, with 1k only at specific switches hosting the terminating CPs' interconnects.

Vodafone considers that the proposed changes to the National Telephone Numbering Plan are appropriate.