

## Consultation response form

Please complete this form in full and return via email to [070marketreview@ofcom.org.uk](mailto:070marketreview@ofcom.org.uk) or by post to:

070 market review team  
Competition Group  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

<b>Consultation title</b>	<b>Personal numbering: Review of the 070 number range</b>
<b>Full name</b>	Daniel Kobale Director of Franzcom Ltd
<b>Contact phone number</b>	☒
<b>Representing (delete as appropriate)</b>	Self / Organisation - please provide the organisation's name below
<b>Organisation name</b>	Franzcom Ltd
<b>Email address</b>	☒
<b>We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)</b>	<b>Nothing</b> / Your name / Organisation name / Whole response / Part of the response (you will need to indicate which responses are confidential)
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	<b>Yes</b> /No

## Your response

<b>Question 3.1: Do you agree with our provisional conclusion regarding market definition? Please provide reasons and evidence in support of your views.</b>	Confidential? – Y/ <b>N</b> Agree
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<p><b>Question 3.2: Do you agree with our provisional conclusion regarding SMP? Please provide reasons and evidence in support of your views.</b></p>	<p>Confidential? – Y/<b>N</b></p> <p>The mobile operators have been dirtying the name of 08 and 070 numbers with their overrated charges, making the 08 and 070 numbers look more expensive than they are. The media publishes false pricing concerns, which are not based if fixed operator charges, rather it's the charges which mobile operators over charge.</p>
<p><b>Question 4.1: Do you consider that the cost of the proposed control is proportionate to the identified harm to consumers arising from this range? If not please give your reasons.</b></p>	<p>Confidential? – Y/<b>N</b></p> <p>However we have recent changed all our own 070 number ranges to K-rate, as we believe that calls to 070 numbers should be capped at K-rate. This is a reasonable rate, which provides enough revenue to cover call termination costs and other IVR services provided and keeps things simple and clear for the consumer.</p>
<p><b>Question 4.2: Do you agree with our proposal for a three-month implementation period? If not, please explain why.</b></p>	<p>Confidential? – Y/<b>N</b></p> <p>Agree</p>
<p><b>Question 4.3: Do you agree that our proposal to implement a charge control on 070 TCPs in the form of a benchmark rate is appropriate? If not, please explain why.</b></p>	<p>Confidential? – Y/<b>N</b></p> <p>Agree</p>
<p><b>Question 4.4: Do you have any further comment on our proposals for regulating 070 termination rates? Please provide reasons and evidence in support of your views.</b></p>	<p>Confidential? – Y/<b>N</b></p> <p>We feel that all the fixed and mobile operators which have over charged on calls to our 070 number ranges should be made to pay it all back to our company and this should apply to all operators. We have do our level best to make sure we stick to the advertised range pricing set down by Ofcom and TCPs who have over charged and taking the mickey of us and Ofcom. This should be done with the mobile operators too who where charging up to 25ppm to call freephone 0800/0808 numbers. They creamed of pure profit without sharing it</p>

	<p>with the range holders. This is unacceptable and should be back tracked to as far back as they have been ripping of the TCP range holders by over charging.</p>
<p><b>Question A9.1: Do you agree with our approach to estimating the cost of providing a 070 service? Please provide reasons and evidence in support of your views.</b></p>	<p>Confidential? – Y/<b>N</b></p> <p>Agree. But we think all 070 ranges should be set at K-rate pricing. This is fair and also fair for the consumer and that any operator charging more to their customers for calling 070 should be made to pay it all back to the 070 range holders and penance for their greed and taking advantage of the wireless operator loop hole, which enabled them to do so.</p>