

## 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>	✂
<b>Contact phone number</b>	✂
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	GCI Network Solutions 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>	Name
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	N/A

## 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>	No response
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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>No response</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 – No</p> <p>No – We do not think that the proposed control is proportionate to the identified harm to consumers.</p> <p>Please see responses to questions below.</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>No response.</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 – No</p> <p>Yes – Yes we agree that a charge control over 070 numbers is good, but we do not agree with Ofcom’s proposal to cap it equivalent to the MTR.</p> <p>070 numbers are widely used by doctors and NHS patients who are not allowed to use mobile phones in the wards. The personal numbers are used by doctors who do not want to give their mobile numbers away and by patients who want to speak to their family and friends when restricted to hospital beds.</p> <p>As Ofcom has already noted in the consultation, a lot of the 070 numbers are provided by resellers who manage the numbers. If the termination rates are made equivalent to MTR, it will significantly impact reseller revenues which will in turn impact the service they offer to legitimate 070 users.</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? – No</p> <p>We would urge Ofcom to consider improving the UK telephone numbering plan to allow Personal numbers a separate and distinguishable number range. We could use 04 or 06 numbers for personal numbering which will go a long way to avoid bill shock, prevent service provider fraud, and artificial traffic inflation.</p> <p>There are other 07 mobile numbers which have a significantly higher MTR, than the proposed termination rates for 070s. Calling these numbers could still give a bill shock, and could be used for fraud, and artificial inflation of traffic.</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? – No</p> <p>Yes. We agree with the approach to estimating the cost of providing an 070 service.</p>