

Consultation response form

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

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

Consultation title	Personal numbering: Review of the 070 number range
Full name	Alex Mather
Contact phone number	✂
Representing (delete as appropriate)	Organisation
Organisation name	The Internet Telephony Service Providers' Association
Email address	✂
We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)	Nothing
For confidential responses, can Ofcom publish a reference to the contents of your response?	N/A

Your response



Internet Telephony Services Providers' Association

ITSPA response to Ofcom Review of the 070 number range

Introduction

The Internet Telephony Services Providers' Association ("ITSPA") represents over 100 UK businesses involved with the supply of next generation communication services over data networks to industry and residential customers within the UK. Our traditional core members are VoIP providers. ITSPA pays close attention to both market and regulatory framework developments on a worldwide basis in order to ensure that the UK internet telephony industry is as competitive as it can be within both national and international markets.

Please note that certain aspects of the ITSPA response may not necessarily be supported by all ITSPA members. Individual members may respond separately to this consultation where a position differs. However, the ITSPA Council is confident that this response reflects the views of the overwhelming majority of ITSPA members.

A full list of ITSPA members can be found at <http://www.itspa.org.uk/>.

Response

ITSPA welcomes the opportunity to respond to Ofcom's consultation on its review of the 070 number range. ITSPA supports the proposed drop in termination rates and is supportive of Ofcom's efforts to reduce bill shock.

ITSPA notes the evidence provided in the original consultation document - and further updates in February 2018 - regarding the fraudulent use of 070 numbers. As you may be aware from previous engagement, we are taking a strong line against telephony fraud, and are already engaged in a number of initiatives to prevent telephony fraud.

We do feel that Ofcom's proposal for a three-month implementation period is, based on previous experience, a little aggressive in terms of timescales, and we would welcome a longer period (e.g. six months) to allow for industry to make the necessary adjustments. For example, a service provider providing a legitimate 'follow-me' service that rely on the termination revenue gained to cover the costs of providing the service and the onward call leg would need to make changes to their business model.

ITSPA would be happy to remain in contact with Ofcom on this issue and would be willing to provide further information if required.