

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	[REDACTED]
Contact phone number	[REDACTED]
Representing (delete as appropriate)	Organisation - please provide the organisation's name below
Organisation name	Netcollex Ltd
Email address	[REDACTED]
We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)	My name /
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question 3.1: Do you agree with our provisional conclusion regarding market definition? Please provide reasons and evidence in support of your views.	I cannot see why you define the market in 3.2 in such terms
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<p>Question 3.2: Do you agree with our provisional conclusion regarding SMP? Please provide reasons and evidence in support of your views.</p>	<p>Confidential? – N</p> <p>While we agree that Originating Networks have SMP for numbers, Ofcom don't seem to have grasped the reality of the costs of running an 070 service. Not only the cost of termination needs to be considered the sending on of the call, administration of the service has to be taken into consideration.</p>
<p>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.</p>	<p>Confidential? – N</p> <p>We do not believe this is Proportionate Action. Previously Ofcom has changed the rules and Regulations in the PNS market and effectively arrested the problems involved. Ofcom are proposing to act on a problem that no longer exists. The data supplied by Ofcom in support of their proposal is out dated and not sufficiently robust to act upon. The reasoning and information Ofcom are seeking to rely upon is outdated and no longer valid. It is not accurate.</p>
<p>Question 4.2: Do you agree with our proposal for a three-month implementation period? If not, please explain why.</p>	<p>Confidential? - N</p> <p>Three months is not being a ridiculously short time to try and make these changes which we do not believe are required or necessary.</p> <p>Hopefully common sense prevails and the status quo is maintained.</p>
<p>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.</p>	<p>Confidential? – N</p> <p>If this was to go ahead the most effected groups of peoples who use PNS are Women and LGBT for anonymisation. If the services are to run post such a change the end user would have to pay. The vulnerable in the womens and LGBT sectors would lose the protection that PNS affords them.</p>

<p>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.</p>	<p>Confidential? – Y</p> <p>In a freedom of Information request to Ofcom it was revealed that the levels of complaints received by Ofcom had progressively diminished year on year. Therefore Ofcom are looking to regulate a problem that has already gone away. https://www.whatdotheyknow.com/request/consultation_personal_numbering#incoming-1108284</p> <p>Wangiri died with the disappearance of drop charge PNS numbers. Any fraud that is currently conducted is a result of BT IPX exchange failing to differentiate between National and International traffic and therefore arbitrage existing on the differential in out-payments. Get BT to differentially correctly between the 2 types of traffic and the fraud goes away. This problem does not occur on TDM traffic. ASK BT if this is the case and if they say NO they are lying to you.</p>
<p>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.</p>	<p>Confidential? – N</p> <p>This is simply wrong to create and manage a service that is auditable and scalable the costs are substantially higher.</p>

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