



Non-confidential

Vodafone Response to Ofcom's
Consultation:
Personal Numbering – Review of
the 070 number range

Vodafone welcomes the opportunity to comment on Ofcom's *Personal Numbering: Review of the 070 number range*.

Ofcom identifies five key weaknesses in its analysis of the range: high retail prices, confusion with mobile numbers, bill shock, vulnerability to fraud and poor reputation. Together these encapsulate that the 070x range is neither well-understood by UK citizen consumers nor as being associated with personal numbering; allowing it to be exploited by fraudulent operators at the expense of genuine service providers.

The Kantar Media research in 2014 showed that only 13% of consumers identified 070 as costing more than 07 mobile numbers. Vodafone has seen no evidence to suggest this position has changed in the intervening years.

Ofcom considered a number of different payment mechanisms: calling party pays, receiving party pays and costs recovered from both parties before then considering the relevant termination rate. Vodafone supports the proposed linkage between 070x personal numbers and 07x mobile numbers. A mobile termination rate significantly reduces the risk of fraudulent activity; although it can be argued that a higher rate (03 termination) or lower (geographic termination) achieves the same outcome. Vodafone will monitor with interest whether the proposed change resolves many of the range's current weaknesses and fraudulent activity.

The proposed three-month implementation period however is insufficient to notify end-users of Ofcom's changes with sufficient time for end-users to change their advertising or to mitigate the financial impact through migration to another range. Vodafone suggests a more appropriate implementation period would be 6-9 months.

Vodafone UK
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