

## Consultation response form

Please complete this form in full and return to [futureofnumberingteam@ofcom.org.uk](mailto:futureofnumberingteam@ofcom.org.uk) or:

Future of Numbering Team  
Ofcom  
125 Princes Street  
Edinburgh, EH2 4AD

<b>Consultation title</b>	Future of telephone numbers
<b>Full name</b>	
<b>Contact phone number</b>	
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	aimm (Association of Interactive Media and Micropayments)
<b>Email address</b>	

## Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	Nothing
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	None
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes / No N/A

## Your response

Question	Your response
<p><b>Question 2.1:</b> We have set out developments in voice telephone services that are important in shaping our review of the future use of numbers to promote consumer confidence. Do you agree that these are the key considerations? Do you have any comments on our analysis of these developments? Are there any other developments or considerations that should be part of shaping this review, and if so, in what way?</p>	<p>Confidential? – Y / N No response</p>
<p><b>Question 3.1:</b> What are your thoughts on the ability to dial local numbers from a landline without the area code? Do you think the local dialling facility has value?</p>	<p>Confidential? – Y / N No response</p>
<p><b>Question 3.2:</b> Do you think local dialling should be closed on an area by area basis as required to increase number supply or across the whole of the UK at the same time? Why do you think this?</p>	<p>Confidential? – Y / N No response</p>
<p><b>Question 3.3:</b> Do you have any views on allowing telecoms providers to make individual decisions on whether to provide customers with the ability to dial local numbers from a landline without the area code?</p>	<p>Confidential? – Y / N No response</p>
<p><b>Question 3.4:</b> For telecoms providers, what are your thoughts on the ability to implement the closing of local dialling in all UK area codes simultaneously?</p>	<p>Confidential? – Y / N No response</p>


<p><b>Question 3.5: For telecoms providers, what are your views on the technical feasibility of providing local dialling to customers when offering an IP-based voice service?</b></p>	<p>Confidential? – Y / N No response</p>
<p><b>Question 3.6: What do you consider are the important factors about geographic numbers? For example, is it the information they provide about the caller/called party? Is it familiarity, trust or confidence in call cost?</b></p>	<p>Confidential? – Y / N No response</p>
<p><b>Question 3.7: What are your thoughts on retaining area codes in geographic numbers? Do you think location significance in geographic numbers has value and should be preserved? If so, why? How might your view change over time?</b></p>	<p>Confidential? – Y / N No response</p>
<p><b>Question 4.1: What are your thoughts about 084 and 087 numbers? What are the benefits and/or disadvantages of contacting an organisation by calling an 084 or 087 number? Can you tell us of any experience you've had calling these numbers? Have you expressly chosen not to call a service that uses these numbers? If so, what led to that decision and how did you choose to make contact instead (if you did)?</b></p>	<p>Confidential? – Y / N No response</p>
<p><b>Question 4.2: We are interested in hearing from people who use 084 or 087 numbers as a contact telephone number. If you use one of these types of numbers as a means of contacting your service, why did you choose to do so? What do you think about using these numbers in the future?</b></p>	<p>Confidential? – Y / N No response</p>

<p><b>Question 4.3: For telecoms providers, we are interested in hearing from providers that offer services on 084 and 087 numbers to their customers. If you do, can you provide some examples of use cases? What benefits do you offer to organisations in using 084 and 087 numbers rather than other numbering options? For originating providers, do you have any customer experience of attitudes towards and views on calling 084 and 087 numbers that you can share?</b></p>	<p>Confidential? – Y / N No response</p>
<p><b>Question 4.4: Are there changes to 084 and 087 number ranges that you think Ofcom should consider proposing to address the concerns highlighted in the research summarised in paragraphs 4.17 to 4.26?</b></p>	<p>Confidential? – N</p> <p>The Association for Interactive Media and Micropayments (aimm) is the specialist UK-based trade organisation representing the commercial and regulatory interests of member companies involved in the interactive media and micropayment industries - where consumers interact or engage with services across converged media platforms and may pay for those services or content using a variety of micropayment technologies including premium rate. We are a not for profit organisation, funded by our members, run for our members. We create conditions for growth and protect the regulatory environment in which our members operate. Members includes all of the Mobile Network Operators, Fixed Line Providers, Level 1 and Level 2 providers as well as Broadcasters, Charities and Industry Support Services.</p> <p>Some aimm members consulted believe that the abolition of 084 and 087 numbers would be no loss to the market – as long as it is carried out in a managed way. These members feel that, with the introduction of PSD2 limits, the removal of 084 and 087 (particularly since a large migration of numbers to 03 ranges has already happened) would be one way of mitigating risks around these limits.</p> <p>Some aimm members consulted however are against the abolishment of 084 and 087 numbers. They feel that they remain useful as an avenue for those with no online access to continue to pay for a service and facilitate a way of assigning costs that may be required for call handling to the consumer making the call</p>

rather than those using cheaper ways to communicate with the provider (such as online).

It was generally agreed that abolishing 084 and 087 numbers could mean that – where there is a need for revenue to be made in order to operate a service, this type of call will be forced to move to 09 ranges. The research presented in the consultation document shows that 09 numbers are well liked by consumers, understood and accepted as a payment mechanic, and it is agreed that consumers are aware that they have a clearly defined function in the marketplace. By moving 084 and 087 traffic to 09 number ranges constitutes a risk which threatens to undermine the trust and confidence that the 09 number range has taken years to build up. Additionally, for those services moving to 09, and with PSD2 audits being undertaken, premium rate barring may become part of a solution to mitigate limit risks and as such, some may find that they cannot access services which have moved from 084/087 to 09.

A large issue with 084 and 087 ranges is simply the lack of understanding of the charges, and this is made entirely worse by the current Service and Access charge split of the call costs. It is difficult enough for consumers to understand a range of call tariffs associated with these numbers, but by unbundling in this way, the task has been made doubly difficult as now there are two charges which need to be understood. When the unbundling commenced, there was an understanding that an education marketing exercise would take place to ensure consumers knew how to locate their access charge and how much it would cost them. This has simply not happened. Consumers do not understand what an access charge is. The research itself shows that the phrase 'access charge' is misleading in the extreme – having a connotation of a 'one-off' charge being applied on access. Adding to this confusion is the fact that access charges differ wildly, and are difficult to locate for consumers. Additionally, Members question whether the anticipated 'market' in access charges ever



occurred. Consumers were intended to be acutely aware of their access charge and use this as one criterion with which to shop around to find the best plan for their needs, but as far as Members can see, this does not happen.

084 and 087 need clearer explanations of pricing. It is perhaps the unbundling element of call costs messages – specifically around the Access charge – that should be completely overhauled rather than the number ranges themselves

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