

## 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>	Self
<b>Organisation name</b>	
<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

## Your response

Question	Your response
<p><b>Question 2.1: 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?</b></p>	<p>Confidential? – N</p> <p>No comment.</p>
<p><b>Question 3.1: 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?</b></p>	<p>Confidential? – N</p> <p>It remains useful in some circumstances – such as for those working in a role where they regularly call a wide range of other local numbers.</p> <p>However, most home and business users could easily programme shortcuts into their phones to achieve the same functionality. For example, a resident in Bournemouth could set up a speed dial button that dials the initial ‘01202’ with a single touch, thus allowing local numbers to be dialled with just seven key presses instead of eleven.</p>
<p><b>Question 3.2: 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?</b></p>	<p>Confidential? – N</p> <p>Slightly prefer to retain it as an available but unpromoted feature in each area to avoid inconveniencing those who currently use it. Usage of local dialling requires specific local knowledge anyway – users can only use it if they are familiar enough with the area to know which digits of a number are optional.</p> <p>However, closing local dialling would be a good opportunity to remove local anomalies in dialling. For example, the 01339 and 01975 areas are officially designated 4+6 areas (i.e. 6-digit local numbers) but are actually operated as 5+5 areas by BT and indeed numbers are still listed in this format in the latest Phone Book. Thus customers of BT in these areas can call each other using five digits, but cannot reach some other providers’ number locally without dialling the full local number, resulting in inconvenience and a barrier to competition.</p> <p>Similar confusion exists in Brampton, Cumbria (01697) where a confusing mix of 4+6, 5+4 and 5+5 dialling setups coexist.</p>

<p><b>Question 3.3: 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?</b></p>	<p>Confidential? – N</p> <p>I am not sure whether this is justified. In particular, I suspect the ‘difficulties’ of providing local dialling on VOIP platforms, etc. are overstated. It should be trivial for the software and web platforms offered by VOIP phone providers to add a prefix based on simple rules.</p>
<p><b>Question 3.4: For telecoms providers, what are your thoughts on the ability to implement the closing of local dialling in all UK area codes simultaneously?</b></p>	<p>Confidential? – N</p> <p>No comment</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? – N</p> <p>No comment</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? – N</p> <p>The location information remains somewhat convenient in identifying local businesses.</p> <p>More significantly, it makes it easier to memorise or note down numbers of friends and businesses. Regardless of local dialling rules, being able to remember just a 6, 7 or 8 digit local number is always easier than remembering a completely random 11 digits.</p> <p>The other issue related to familiarity is that while either the current structure or a hypothetical future structure where landline numbers were issued completely at random may work equally well in isolation, any transitional phase between the two would be awkward. Most businesses and perhaps many consumers would probably not want to be issued with ‘alien’ numbers while their competitors / neighbours all retained the established local area code. (Even if new numbers were issued geographically rather than completely at random there would likely be issues: twenty years after it was introduced as an overlay, New York’s 646 area code is still viewed as inferior to the original 212 code by many.)</p>

**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?**

Confidential? – N

Retain where possible for the reasons stated in 3.6 above, regardless of whether or not local dialling continues.

However, consider some changes that improve flexibility or remove anomalies that currently damage understanding of location significance, such as:

(i) Removing the redundant subdivision that exists within certain area codes to reduce the volume of wasted numbers. For example, 01423 is currently subdivided in the Numbering Plan with a requirement for 'D' digits 2, 5, 6, 7 and 8 to be issued for Harrogate while Boroughbridge may only use digits 3, 4 and 9. The historic call charging arrangements behind such splits no longer exist and the current situation causes waste by requiring smaller providers to secure two numbering blocks in one area code where one would suffice. It seems doubtful that the additional location information provided by this split at 'D' digit level is of any practical use to consumers and is already disregarded by some numbering providers. (Other areas affected include 01437, 01507, 01686 and 0191 among others.)

(ii) If local dialling is closed nationwide, merging the confusing mixed 4+6 and 5+5 numbering areas that exist in the North West and Scottish Borders. For example, remove the obscure distinction between 01946 and 019467 and redesignate the combined area as simply 01946.

(iii) Correcting the naming errors that persist in certain areas, such as 01841, 01885 and 01886.

(For reference, 01886 is officially designated as Bromyard but numbers in this area have in fact always used the 01885 code. Similarly, 01841 ought to be renamed to 'Padstow' or similar as it is confusingly designated as 'Newquay' presently, despite this latter town having its own area code of 01637.)

**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)?**

Confidential? – N

All charging rates and functionality available on 084 and 087 numbers are also available on 09 numbers. Furthermore, simple migration routes to 03 numbers have been offered and most sizeable organisations have successfully switched customer service and advice lines away from 084/087 numbers.

Therefore, it appears that 084 and 087 numbers only persist where:

(a) A business (typically an SME) has held a number for many years and is unaware that better alternatives are now available, *or*

(b) An organisation consciously chooses an 084 or 087 prefix knowing that many customers still wrongly perceive the former as 'local rate' and will call without realising the true costs, *or*

(c) A business refuses to take responsibility for migrating services away

from an 084 or 087 number because they are delivered by a third party contractor.

In all these cases, it would seem the only sensible solution remaining would be to discontinue the 084 and 087 range, thus requiring such organisations to actively choose whether to move to either a genuine premium rate 09 number or to a cheaper alternative.

Ofcom's pricing reforms for 084, 087 and 09 numbering and the associated guidance on publishing clear pricing statements gave organisations an opportunity to retain their existing numbers in return for being honest and transparent with customers about the costs that apply when they call such numbers. If organisations were consistently doing this, there would be little cause for complaint as customers would be able to make informed decisions about calling.

However, while 09 numbers generally seem to be compliant, it seems that many operators of 084 and 087 numbers are still failing to provide accurate pricing statements. It therefore appears that this approach has failed in respect of 084 and 087 numbers and that the only way to make sure consumers are aware of when they are likely to be subject to a service charge is to consolidate all such numbers within a single, clearly identifiable range – namely the 09 range.

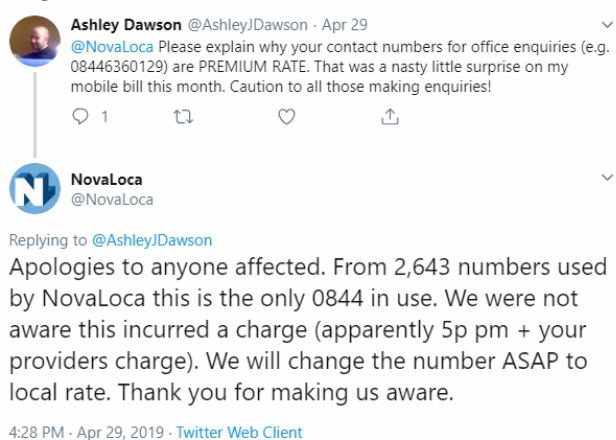
### Examples:

1. Major companies continue to omit pricing statements or provide incorrect pricing statements.



(Tweet by @British\_Airways 21/04/2019 wrongly describing 0844 as local rate.)

2. Some companies still claim to be unaware of the costs that apply to long-held numbers.



(Tweet by @NovaLoca 29/04/2019 claiming they were unaware that their 0844 number was chargeable.)

3. Some major companies still promote 084 numbers for customer services despite repeatedly being told this is illegal:



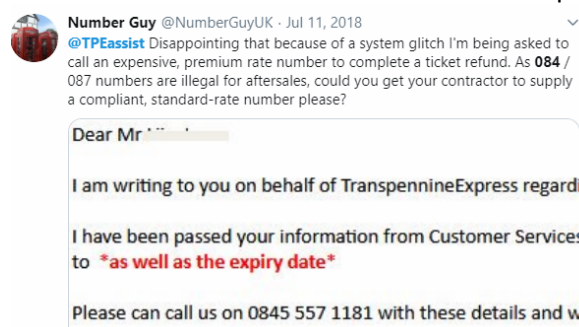
Replying to @TommyRumsey

Hi Tommy, please call our team here - 0844 571 9141 so this can be resolved ASAP

5:36 PM · Jul 29, 2018 · Hootsuite

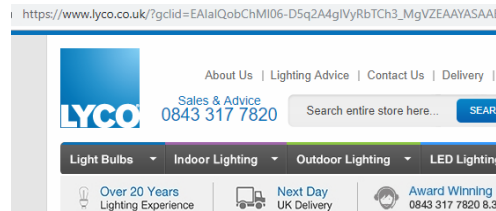
(Tweet by @Dominos\_UK 29/07/2018 offering an 0844 number for customer services, in breach of customer protection law and with no cost information.)

4. A rail company's subcontractor required a customer to call an 0845 number to progress a refund despite such numbers being banned for post-sale enquiries. Repeated complaints to the rail company resulted only in continual claims that this was a 'third party matter' and a refusal to instruct their contractor to switch to a compliant number.



(Tweet to @TPEassist 11/07/2018 complaining about 084 number.)

5. Businesses still routinely fail to publish call costs alongside the relevant 084 or 087 number as required, even where it would be easy to do so:



(www.lyco.co.uk homepage as at 03/05/2019 showing prominent 0843 number with no accompanying pricing statement.)

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

Confidential? – N

No comment

<p>the future?</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? – N</p> <p>No comment</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>Retire the 084/087 ranges or at the very least halt new issues of all such numbers. Ample capacity for legitimate paid-for services exists within the 09 range.</p> <p>Most reputable organisations have long since migrated away to 01/02/03, 080 or 09 numbers as appropriate. By now it most surely be concluded that most of those who continue to use 084 and 087 numbers can only be doing so because they are ignorant of the issues or because they prefer not to be transparent about the charges they levy on callers; removal of 084 and 087 numbers would seem to be the only remaining tool for prompting them to re-evaluate their numbering choices.</p>

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