

Consultation response form

Please complete this form in full and return to futureofnumberingteam@ofcom.org.uk or:

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

Consultation title	Future of telephone numbers
Full name	
Contact phone number	
Representing (delete as appropriate)	Self
Organisation name	
Email address	

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](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Your name
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question	Your response
<p>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?</p>	<p>Confidential? – No</p> <p>1 Ofcom ignores the existence of what have become known as Virtual Geographic Numbers. These are issued as Geographic numbers which are then used by the service provider in effect as a Number Translation Service. In that they only function because they are translated or 'Delivered To' either a mobile number or an IP based service such as Facebook. Such providers do not have any network infrastructure they are not capable of providing a traditional landline service therefore they only provide Virtual Geographic services. Perhaps because Ofcom ignores the existence of Virtual Geo Numbers they are widely misused by fraudsters for scams. Ofcom should wake up to this development and include this in the review.</p> <p>2 Ofcom seem to make no mention of the Calling Line Identity CLI. Currently a Landline gets its CLI as a feature of the connection. A normal customer has no way to change that CLI we are used to this and it is to the general benefit of all. The IP future will not have such hard wired CLIs right now many folk who use IP telephony can change their CLI via the software client. This is generally bad for the public – because more and more bad actors will take advantage. Ofcom should include this issue in the review.</p>
<p>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?</p>	<p>Confidential? – No</p> <p>Historically Telecoms engineers referred to Director Areas places such as Cities and larger towns - London, Birmingham, Manchester etc. These all have 4 digit area codes. Local dialling in Director Areas has a great benefit.</p>
<p>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?</p>	<p>Confidential? – No</p> <p>Agree with the area by area approach as required. But 'Director Areas' should be the last to lose local dialling.</p>

<p>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?</p>	<p>Confidential? – No This is a bad idea – it could lead to confusion and impede switching service providers. If BT maintain local dialling and say Talk Talk or SKY do not then that could be a barrier to switching.</p>
<p>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?</p>	<p>Confidential? – No They will do it if it were required AND very importantly if enough notice were given.</p>
<p>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?</p>	<p>Confidential? – No There are IP based voice services right now and they manage to mimic Landline services in that they do provide local dialling currently. It's all a matter of programming.</p>
<p>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?</p>	<p>Confidential? – No Yes Geographic numbers do or should provide useful information about the caller and or called party. There is a familiarity and comfort in knowing the call comes from nearby. However as mentioned earlier – the development of what have become known as Virtual Geographic numbers is interfering with this trust. Many many scams now use such Virtual Geo numbers because it allows the fraudster to hide behind a trusted number range.</p>
<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?</p>	<p>Confidential? – No Despite some misuse there is still great value in retaining location significance in Geographic numbers. In about 20 years from now this may have diminished to a point that it no longer matters.</p>

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? – No
Ofcom effectively gave birth to the Network Access Charge and clearly now regrets it.

Once again Ofcom assumed competition would keep NAC low - wrong. Look how the mobile operators jumped over each other to raise NAC. When will Ofcom ever learn?
So now 084 and 087 are burdened by NAC which is often many times more costly than the service charge itself. It is so bad it might be better to close down the lot and force a migration to 03. The few Comms Providers brave (or foolhardy) enough to make 084 and 087 inclusive suffer serious financial loss due to AIT linked with 084 and 087 numbers and Ofcom offers no respite. Its noticeable that most of the mobile networks have not made them inclusive for that very reason – one can only wonder..

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?

Confidential? – Y / No
The worst use of 084 and 087 numbers are the ICSS providers (Signposting Services). They use Google ads to promote what the caller thinks is a customer contact number for SKY or HMRC etc. They mention Network Access charges in the small print but fail to mention that this might be over 50p per minute on top of the 7p/min the provider charges! Worst still the call centre agent has no idea the poor caller is paying through the nose. The call could last for 30 minutes or more meaning huge costs are incurred mostly in Network Access charges. ICSS should be banned from using 084 and 087 because of the Network access charge.
I felt I had been tricked into using what turned out to be an ICSS. Those who provide such services know full well they are conning the public and they don't care.

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?

Confidential? – Y / N

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?

Confidential? – No

Ofcom should ban use of 084 and 087 for ICSS
If not banned then cost warnings for Network Access charges should include an indication of the cost. Such as - Network Access Charges for calls from Mobiles may cost in the region of 50p/minute for each and every minute.

Please complete this form in full and return to futureofnumberingteam@ofcom.org.uk or:

Future of Numbering Team

Ofcom

125 Princes Street

Edinburgh EH2 4AD