

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)	Organisation
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.	Please keep our Name and Organisation name confidential.
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	Please keep our Name and Organisation name confidential.
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.</p> <ol style="list-style-type: none"> 1. Do you agree that these are the key considerations? 2. Do you have any comments on our analysis of these developments? 3. Are there any other developments or considerations that should be part of shaping this review, and if so, in what way? 	<p>Confidential – N</p> <p>We have carefully read the Future of Telephone Numbers document and agree with the general view of Ofcom about the analysis and market developments.</p> <p>From our point of view as a vendor in NMS and NP, we have several suggestions to improve the overall structure.</p> <p>Below is an outset of these main topics:</p> <p>1.5/ 1.6 The term nuisance calls also came forward in several other Ofcom documents that were focussed on preventing unsolicited calls. A nationwide marketing opt-out register with similar ruling as in Ireland could prevent nuisance calls all together.</p> <p>2.5/ 2.6 Our NMS solution provides in the allocation of number blocks in any format. This option will create a more flexible numbering plan and number allocation to all parties.</p> <p>2.7 Unwanted and unclear costs are always a main concern for consumers. To create consumer confidence there are several ways to establish this.</p> <p>Usually mobile and fixed numbers are subjected to a standard pricing and the challenges lay in the premium and exotic numbers. For this reason, the suggestions below could promote confidence:</p> <p>Premium numbers:</p> <ul style="list-style-type: none"> • Maximum price per call set-up • Maximum price per minute • Maximum price per total call duration • Announcement of expected costs at the beginning of the call • VAT regarded to the call per number type • Call charge starts after announcement <p>To be able to implement this a nationwide tariff plan need to be agreed on with a standardized tariff plan.</p> <p><i>Some of these might already be implemented on a regulatory level but perhaps not on an operator implementation made available to the public.</i></p> <p>2.13 Geo code remains important</p> <p>2.17 We agree that current days there are better alternatives then using premium numbers as a</p>

	<p>micropayment mechanism.</p> <p>2.20 without having read section 4 at the point of writing this answer the trust in 084 and 087 numbers could be improved by implementing the same rules for 09 premium numbers or the suggestions stated earlier.</p> <p>2.23 for the avoidance of bill shock the originating operator should announce the expected costs at the beginning of the call so that the customer can make the informed decision to proceed or not.</p> <p>2.30 Even now that the lines between fixed and mobile numbers are blurring still a lot of calls are based on either contacting an individual at a mobile number or a fixed number within a certain geographical location. Although technology makes it easier to redirect calls to a certain point of presence it is our opinion that the difference between the two is still relevant.</p> <p>2.31 The future of numbering research is not fully aligned with our statement at 2.30 and we agree that the relevance of fixed lines is declining. However, we still consider the difference between fixed and mobile and the capabilities for fixed as a relevant service within the market.</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 – N</p> <p>At this moment end-users are used to enter a complete number. Leaving an area code has minimal value towards the end-user. Furthermore, we expect that operators will face technical difficulties when implementing local dialling and gain minimum advantages.</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 – N</p> <p>We think that the closing of local dialling across the UK is the way forward. Closing local dialling across the UK provides the opportunity to:</p> <ol style="list-style-type: none"> 1. Create awareness in the entire UK at the same time; 2. A nationwide campaign prevents confusion within certain areas and travelling between areas as it shall be the new standard; 3. Standardize this new process for all subscribers, operators and third parties; 4. Changes to the Numbering Plan can be performed at the same time which will provide Ofcom a clear overview of the new numbering resources <ol style="list-style-type: none"> a. A new of distributing numbers and the amount of numbers can also be implemented simultaneously.

<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 – N Our advice here is to implement a nationwide standard which removes local dialling and therefor dialling local numbers shall always be done with the area prefix.</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 – N Due to fact that we are not a Telecom Provider we refrain from answering this question.</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 – N Due to fact that we are not a Telecom Provider we refrain from answering this question.</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 – N The important factors are mentioned by Ofcom within these examples:</p> <ol style="list-style-type: none"> 1. Caller Party Information 2. Familiarity based on locations and area's 3. Trust based on locations and area's 4. Confidence in call costs <p>When dialling a Geographic Number from an unknown party (someone not in your own phone book) it provides a certain trust in the dialled number. For instance, when calling your local pizza place, the insurance company or a government al agency a Geographic Number seems more trustworthy than dialling a mobile number which is often linked to an individual.</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 – N As for now we think that area codes are still relevant for call set-ups and call routing. When area codes are removed certain providers would be handed a competitive advantage because of the company size and number registration. We expect that for the next decade(s) the area code will keep its relevance in the complete number for setting up and routing a call.</p>

<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)?</p>	<p>Confidential – N</p> <p>Considering the average use-cases of the 084 and 08 numbers and similar type of number across the world we <u>expect</u> that UK telephone numbers beginning with '08' are used by many different organisations. These types of numbers are commonly used for customer service centres, helplines and chargeable information services. Organisations that use 08 numbers usually use this number type to create a reputable number experience. Due to the price uncertainty and potential high costs for callers of these numbers we expect that confidence in these numbers is declining and that bill shocks might occur. To restore the reputation, we advise to implement a tariff plan that sets out in the maximum of prices as well as set-up costs and call duration. For paid service numbers parties need to announce to the caller what the expected costs are. A caller can then make an informed to proceed or not.</p> <p>As a foreign party we do not have experience with calling these types of numbers, therefore we cannot share more information about the decision that led to call or not.</p>
<p>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?</p>	<p>Confidential – N</p> <p>Due to fact that we are not a Telecom Provider and do not have in country experience with calling these numbers we refrain from answering this question.</p>
<p>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?</p>	<p>Confidential – N</p> <p>Due to fact that we are not a Telecom Provider we refrain from answering this question.</p>

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 – N

Whilst reading the Ofcom document and several online posts we found out that the main issue around 084 and 087 numbers is the lack of price understanding. Although Ofcom made a change in July 2015 to make the cost of calling service numbers clear for everyone, there is still a misunderstanding amongst the public. We expect that for each special rate number a service announcement could help to create price awareness.

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