

June 2019



Future of telephone numbers

Response to Ofcom's first consultation

We agree with the issues identified by Ofcom. We consider that Ofcom should (i) continue to allocate geographic numbers on a regional basis; (ii) remove local dialling; and (iii) review how 084 and 087 numbers are used.

1.1 We agree with the issues identified by Ofcom

In its consultation, Ofcom highlights two areas of the National Telephone Numbering Plan that it is considering amending:

- a. **geographic numbers** – whether geographic numbers should continue to be allocated on a regional basis and whether customers should be able to call local numbers without dialling an area code (local dialling); and
- b. **non-geographic 084 and 087 numbers** – whether customers understand the charges incurred when dialling, and have trust in, '084' and '087' numbers .

We agree that these two issues should be considered by Ofcom. At this stage, we do not believe that there are other issues that need to be considered within the scope of this consultation (including Mobile and Premium Rate Services).

Ofcom is not proposing specific changes in this consultation. Instead, Ofcom plans to further consult on any proposals for change later in the year. We expect to provide more detailed comments on any specific future proposals that Ofcom puts forward at that stage.

1.2 Geographic numbers

1.2.1 Ofcom should continue to allocate geographic numbers on a regional basis

We think Ofcom should continue to allocate geographic numbers on a regional basis. We accept that geographic numbers are more likely to be used 'out of area' in the future. However, as Ofcom's research shows, some customers continue to value the regional allocation of geographic numbers . On that basis, there is no need to reconsider this arrangement or remove regional allocation of geographic numbers at this stage. This is however an area that Ofcom should continue to monitor as we expect that the value that consumers place on local numbers may reduce over time as more and more geographic numbers are moved out of their initially allocated area.

1.2.2 Ofcom should remove local dialling

We agree that the introduction of 'Voice over IP' services makes it more onerous for communication providers (CPs) to support local dialling. If a provider chooses to allow numbers to be moved "out of area", it would require

the “dialling plan” associated with Analogue Telephony Adaptors to be dynamic and to automatically update when its location changes. Although it is technically possible to deliver this functionality, it would be complex to design and implement, would increase cost and smaller CPs may be unable to implement. If local dialling no longer offers material benefits to customers (and the results of Ofcom’s customer research in the consultation suggest that it does not – which we agree with) then it should not be required. Our view is that this is an appropriate time to consider and plan for the removal of local dialling.

There are both positive and negative implications with implementing such a change on either an area code or national basis. For example, removal of local dialling on an area code basis would allow for more targeted communications with customers. However, a national removal of local dialling would reduce the complexity on a provider’s provisioning process (as this is not easily modified on a local basis).

1.3 Non-geographic numbers

1.3.1 We agree that there is consumer confusion over the costs of 084 and 087 numbers

We agree that there is customer confusion over the prices charged for dialling 084 and 087 numbers. It seems clear from Ofcom’s Future of Numbering Research that the changes to non-geographic numbers made in 2015 have not had the desired effect of making it easier for customers to understand the charges that they pay for calls to these services.

We do not provide access to our customer services via 084 and/or 087 number ranges, nor do we offer wholesale inbound call services on such number ranges to other organisations.

We do not have any firm views of changes that could be implemented in this area at this stage. It could be that the large number of different price points available on 084 and 087 number ranges increases the amount of customer confusion.