

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	Telecom2 Ltd
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.	Nothing
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?	N/A

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? – N</p> <p>While we are in general agreement with the considerations there is one issue that isn't addressed that we feel is important to protect consumers.</p> <p>In 2.21 mention is made of consumers experiencing unexpected or unreasonable charges and in 2.2 there is a reference to anomalies in call charges....resulting in unexpected expense. The variances in prices for 07 numbers with a consequent risk of bill shock and/or unreasonable charges. The biggest anomalies are not the termination rates but the premiums charged by many Phone Service Providers in the form of Access Charges and high rates for calling 07 numbers other than mobile ranges, especially PNS, which are often high multiples of the termination rates. This will not change under this so review bill shock and consumer harm will still occur.</p> <p>We disagree that choice of whether to make a call to or from either number type is no longer constrained by differences in call cost (2.29). People use mobiles in preference to fixed land lines because the bundles are more generous.</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>This was a valuable facility but we can see no strong reasons for retaining it.</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 believe that local dialling should be closed in whichever way individual phone service providers feel suits their network and commercial offering the best. Imposing one way or the other could cause phone service providers difficulty. Provided users in those areas are made aware of the change there shouldn't be a problem</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? – N</p> <p>We think it is right that telecoms providers are allowed to make their own decisions based on what suits them but should be encouraged to do so before numbers in an area become scarce</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</p> <p>Our network is such that it would suit us to close local dialling in all area codes simultaneously</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</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</p> <p>Geographic numbers provide the location of the caller and the called party. This can be valuable to many domestic users in particular, it can help to identify the persons. Geographic numbers will give confidence about call costs and are trusted.</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</p> <p>Area codes should be retained where possible the location information they provide can be useful in identifying the location of a caller/called party</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>084 and 087 numbers are not frequently used to contact companies since the EU Directive on customer services but do offer services at a low cost and are recognised for this, although access charges can cause significantly higher charges to be raised by caller's phone service providers. Personally I would avoid using these numbers purely because of the access charges and would attempt to find a Geographic or 03 number that offered the same service. Outside</p>

	<p>that I would have no concerns about using them.</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>We don't have 084/087 contact numbers, we use geographic numbers because of the EU Directive on Customer Services</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>Within our client base the main use for 084 and 087 numbers is sales lines for catalogue sales and mail order companies. We don't have sight of their customer's views but given the quantity of numbers that have been allocated to these numbers the customer experience must in general be good or the companies would move to other number ranges.</p>
<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?</p>	<p>Confidential? – N</p> <p>084 and 087 numbers tend to be used more for low cost services than contact numbers, legislation makes them unattractive to businesses for use as contact numbers. This was far from the case prior to the EU Directive on customer services, use of them for contact numbers by businesses and utilities was widespread. The concerns raised by OFCOM would be addressed by better education of consumers, firm rebuttal of scare stories in the media and a reduction in access charges.</p>

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