

Consultation response form

Question	Your response
<p>Question 3.1: Do you agree with our proposal to remove the obligation for telecoms providers to provide the local dialling facility? Please provide reasons for your response.</p>	<p>Confidential? – Y / N</p> <p>No response from Members</p>
<p>Question 3.2: Do you agree with our proposal to retain the provisions in the Numbering Plan which (i) allocate location significance to area codes and (ii) allow phone users to request out-of-area use of geographic numbers? Please provide reasons for your response.</p>	<p>Confidential? – Y / N</p> <p>No response from Members</p>
<p>Question 4.1: Do you agree with our proposal to modify the Numbering Plan to prohibit direct and indirect revenue sharing with the calling party for calls to all geographic and non-geographic numbers? Please provide reasons for your response.</p>	<p>Confidential? – Y / N</p> <p>The Association for Interactive Media and Micropayments (aimm) is the specialist UK-based trade organisation representing the commercial and regulatory interests of member companies involved in the interactive media and micropayment industries - where consumers interact or engage with services across converged media platforms and may pay for those services or content using a variety of micropayment technologies including premium rate. We are a not for profit organisation, funded by our members, run for our members. We create conditions for growth and protect the regulatory environment in which our members operate. Members includes all of the Mobile Network Operators, Fixed Line Providers, Level 1 and Level 2 providers as well as Broadcasters, Charities and Industry Support Services.</p> <p>*Members consulted have a concern about the premise in the opening statement around this topic which reads as follows:</p> <p>We propose to prohibit the direct and indirect sharing of revenue with any calling party for all geographic and non-geographic numbers.</p> <p>Whilst there is an appreciation that cash for calls schemes may still exist, the market feels that this is a declining issue, and as such does</p>

not require such a step in the Plan. In any event, some Members feel that the level of traffic to these services is so low as to have no significant impact on the decision to include 084 and 087 numbers in bundle. A more significant factor is the loss of Access charges associated with these calls if they go into bundles.

Members consulted suggest that this proposal - listing as it does the prohibiting of indirect sharing of revenue - puts competition services at risk. Competition prizes are often provided for by revenue that is generated by competition calls, therefore that caller that is selected as a winner is indirectly receiving revenue for making that call. The consultation specifies that the indirect benefit that is prohibited can be:

Money

Vouchers/tokens

Credits

Products or services with some inherent value

All of these are consistent with prizes won by callers entering competitions and – written as the proposal is – could be classified as indirect revenue.

This risk against the business case of prohibiting cash for calls which are declining feels unbalanced.

Members seek assurance that this is not the intended consequence of this proposal and that this is explicitly stated.

*Regarding the next steps for Ofcom's numbering review of 084 and 087 numbers. Some Members noted that those number ranges can offer consumers a reliable low value way to pay for services, particularly in the current climate where we have seen a large move away from using cash. They suggest that it is the access charges that contribute to the lack of transparency and consumer understanding, not the number ranges themselves.

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