Your response

Question	Your response
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.	Confidential? – Y / N Yes, see following additional comments.
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.	Confidential? – Y / N Yes
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.	Confidential? – Y / N Yes

Please see attached response.

Additional Comments

Removal of Local Dialling

By way of background, for 5 years I was chairman of the Standing Committee of TNAB (the Telephone Numbering and Addressing Board), the Industry Committee set up by what was then Oftel. This committee (inter alia) formulated the changes to the numbering scheme firstly in 1990 that changed London 01 to 071 / 081 as a precursor to enable PhONEday in 1995 which changed London numbers to 0171 / 0181 and the "Big Number Change" in 2000 using the now freed up 02 area code giving London the 0207 and 0208 codes.

In the strategy work involved in developing the 1990 change, one option that we considered was removing local dialling in those areas facing potential number exhaustion to free up additional numbering space. However, given the state of network technology at the time, and also since this was largely before autodialling capabilities were available in most types of CPE (and therefore we were concerned about the increase in the average number of digits that had to be dialled), along with the relatively modest gains in capacity compared (for example) with the almost doubling of London capacity by splitting the area into 2 codes, at that stage we decided against it.

It is therefore interesting to see that you are now proposing the same step i.e. to allow the removal of local dialling.

Given the move to IP based networks, in which number translation capabilities and call routing are managed completely differently to the PSTN, and with a significant proportion of calls being dialled using auto dialling functions, the circumstances today are completely different, and therefore I support your proposal in Option 1 to remove the obligation to provide local dialling.

Given that this option will allow each operator to determine when and where they cease local dialling, and therefore carefully manage the complex transition (including the need to advise customers both before and for a period after the change, along with the number trapping for calls that continue to be attempted using local dialling) I can see no merit in continuing with the status quo i.e. Option 2.

Regarding Option 3, this would create the need for a hugely unnecessary national publicity campaign and complex technical implementation requirements. Further, it would most likely be difficult to agree on a date, and it would cause disruption in many dialling areas where no benefit would be forthcoming from the change. I can see therefore no merit in Option 3.

While removing the obligation from operators to provide local dialling will free up numbering space and therefore allow expansion of the existing numbering ranges, there are two other complementary solutions that may delay the necessity of removing local number dialling by increasing the capacity of the existing numbering range:

(i) As you outline in para 2.12, with IP technology the size of the individual blocks allocated to operators can be reduced, even down to individual numbers. By judiciously exploiting this opportunity, in some charge group areas, this could have a dramatic effect on the efficiency of the numbering scheme.

(ii) Furthermore, I note that in your report you say "… while the majority of households might have a landline connection, only 54% of people actually use their landline to make calls…." I would suggest that it is a remnant of history that every subscriber who has a subscription for broadband access is also required to subscribe to the telephone service, while, from your own research, almost half do not use it for making calls. Therefore, if subscribers were offered the option to subscribe to a broadband service, but without a

telephone service subscription, then probably a significant proportion of the 46% of subscribers who never make calls on their landline would opt out of the telephone service. This would have the effect of freeing up a significant number of numbers in each local area and thereby eradicate the need to remove local dialling in many areas while at the same time giving customers the option to subscribe only to those services which they actually use.

Number Spoofing

I would also like to make a comment about a further issue that you raise in your consultation paper, namely number spoofing.

A primary issue here is that PSTN signalling systems (in particular C7), the development of which started over 40 years ago, were conceived with no concept of security, so regrettably there is neither messaging encryption nor authentication within the signalling system. This means that the prevention of number spoofing on the PSTN is virtually impossible.

Nevertheless, as all telephone subscribers will recognise from the number of intrusive, fake calls that we all receive, number spoofing is a growing problem, and is a primary weapon in the armoury of the scam callers. A particular concern, as reported by many media reports on scan calls, is the use of legitimate, but spoofed, numbers such as credit card fraud reporting numbers as a way of convincing the unfortunate called subscriber that the call is genuine.

I recognise as expressed above, and as you identify in your consultation papers, that the prevention of number spoofing on the PSTN would be extremely difficult, if not impossible. Nevertheless, the fact that we cannot develop an ideal solution, should not mean that we should simply dismiss the problem as too hard. Instead, we can look at targeted solutions that would nevertheless make a real difference.

If we examine number spoofing on any of the major networks in the UK (both fixed and mobile), the vast majority, if not all, of spoofed calls come from other networks and therefore are carried across one or more points of interconnection. Further as expressed above, the worst cases of number spoofing are of well publicised numbers e.g. credit card numbers, bank numbers, HMRC etc. There are only a limited set of such numbers (perhaps 100-200 at most).

For the major UK networks, where these CLI addresses appear at a point of interconnection, I believe that, using current technology, it would be possible to trap and supress CLI on these numbers at the point of interconnection. Further, since many, if not all, of these numbers are only used for incoming calls and therefore should never appear as CLI indications, it should also be possible, at the point of interconnection, to suppress the call.

Such a solution will not, of course, prevent all number spoofing. Nevertheless, it would stop the most insidious spoofing of CLI numbers and thereby bring some relief to subscribers from the use of false CLI numbers to help legitimise scam callers.