

## Consultation response form

Question	Your response
<p><b>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.</b></p>	<p>Confidential – N  <b>FCS response.</b> The FCS agree with this as the value of 'local dialling' is low and reducing. FCS feel that when/if it is withdrawn, it should be done across the whole UK at the same time, in a structured manner, with clear and timely comms. The comms should take into account elderly and vulnerable customers still utilising local dialling in for example pre-programmed landlines. Many people (and also potentially the emergency services) currently utilise the number calling prefix as an indicator of a call origination. Once removed people such as the elderly and vulnerable could be more liable to scams or inappropriate contact. Therefore, FCS feels that clear Ofcom communication with all key stakeholders around the removal of this functionality will be critical to the UK. Removing local dialling will also ensure future alignment with mobile networks (where is it is not utilised).</p>
<p><b>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.</b></p>	<p>Confidential – N  <b>FCS response.</b> The FCS agree with this proposal and are against 'cash for calls schemes', which are not in the best interests of industry, our members and potentially our members customers. FCS believes that there needs to be a very clear definition of "indirect sharing", enabling clarity for industry. There are potential impacts for CPs who provide bundled call package offerings, however this needs to be balanced with the ability for CPs to innovate with regard to services offered without fear of inadvertently generating an indirect relationship with callers.</p>
<p><b>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.</b></p>	<p>Confidential – N  <b>FCS response –</b> Some FCS members business customers who move geographic location, may continue find it useful to retain a geographic dialling code that their end customers recognise. Similarly, currently, residential customers, particularly vulnerable customers, will take comfort in being able to retain their known numbers when they move</p>

	<p>geographically. However, post the proposed 2025 PSTN switch off and the move to All-IP, retaining a geographic dialling code number will potentially have no relevance and therefore up to this time, use of this functionality can decline naturally. As we move to All-IP the differentiation between “Fixed” and “Mobile” numbers should ultimately be lost as all numbers are planned to be virtual from 2025. In future, this will provide a benefit to consumers enabling them to keep their landline number wherever they move (regardless of geographic area). The number will become a routing address for voice calls that stays with them, in a similar way to an email address.</p>
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Please complete this form in full and return to [futureofnumberingteam@ofcom.org.uk](mailto:futureofnumberingteam@ofcom.org.uk).