



Second consultation: future of telephone numbers

KCOM's response to Ofcom's consultation July 2021

1. Introduction

- 1.1 KCOM Group Limited ('KCOM') welcomes the opportunity to respond to Ofcom's consultation setting out proposals for the future of geographic numbering.
- 1.2 We are generally supportive of Ofcom's proposals. In particular, we are conscious that local dialling is highly valued by our customer base in the Hull Area and welcome the option to continue to offer this feature.
- 1.3 While we support the proposal to prohibit direct and indirect revenue sharing with the calling party for calls to all geographic and non-geographic numbers, we do have concerns regarding enforcement of the prohibition.

2. **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.**

- 2.1 The decision to remove the requirement for Local Dialling from the Numbering Plan, while also retaining the ability for a CP to retain it, represents a best of both world's scenario. This will also give KCOM flexibility as it migrates voice services to IP.
- 2.2 Allowing CPs the option to retain local dialling means that they can make an individual decision as to whether their customer base value the feature.
- 2.3 Customers who value local dialling will retain the ability to use this service without disadvantage to any consumers who choose not to, as dialling a full number will still connect a call within a local dialling area.

3. **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.**

- 3.1 KCOM agrees with the proposals to continue to allocate location significance while also allowing phone users to request an out-of-area geographic number.
- 3.2 While, with the move to an All IP telecommunications service, there is a reduction in location significance from a technical standpoint, these identifiers are still useful at a local level. Businesses may want to identify their location through an easily recognisable mechanism and a local dialling code is already well known and used for this purpose. This can also reduce costs for businesses when they are moving



premises between areas codes and may face costs in relation to changing customer communications such as literature.

- 3.3 Consumers may expect a newly connected landline to be prefixed with certain area code. The removal of these identifiers at this point has the potential to cause confusion around why a customer is being presented with the number as offered.
- 3.4 We continue to see requests for out of area numbering. This indicates that consumers of these products and welcome the identification that local numbering offers as well as the freedom to route these numbers to an out-of-area location.

4. 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

- 4.1 KCOM agrees that there is significant potential for the practice of revenue sharing with calling parties to result in harm and welcome the decision to modify the Numbering Plan to prohibit revenue sharing of this kind.
- 4.2 However, we do have reservations concerning how Ofcom anticipates this prohibition would be policed and enforced. As a CP allocating numbers to customers, while we are able to include contractual provisions to prohibit this activity by our customers, enforcement is more problematic and Ofcom has not addressed this issue in its proposals. We would welcome further clarity from Ofcom as to how it envisages the practical policing and enforcement of any prohibition would work.