

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? –N</p> <p>No – I was alarmed by some of the network operator responses to the first consultation which seemed aggressive and focused solely on their own interests. Some of them quoted technical issues (always a cop-out with the speed of technical innovation) and resolutely ignored the existing harms to end users from spoofing of local numbers by cold callers and fraudsters</p> <p>I would suggest they need more skin In the game by making them mandatorily liable for compensating end users for any losses arising . They would then be able to make a more effective cost benefit analysis if their capital and reputation was at risk</p> <p>I was also intrigued that there was no input from organisations like the local police services and organisations such as Action Fraud ,the National Cyber Security Centre and the big financial institutions who have to field the consequences – certainly the £Billions quoted for telephone system enabled fraud should be explicitly factored into Ofcom’s calculation of harms</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? – N</p> <p>Yes – although I would expect for (ii) the default expectation is that there is an increased risk of fraud to end users involved</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.

Confidential? – N

Yes – enforcement of good practice among the commercial providers is already only effective at network operator level and the judgements of the PSA suggest that the network operators are relatively ineffective at policing their commercial customers

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