

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>Yes – entirely.</p> <p>Agreed due to declining awareness and use. Also, in light of the consultation’s suggestion geographic numbers could become portable beyond their original areas in the future, it would seem prudent to remove local dialling now. Should local dialling and wider portability co-exist, it is likely confusion and misdialling would arise.</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>Yes - partly.</p> <p>General geographic significance should be retained for area codes. However, Ofcom should look to remove the additional geographical significance the Numbering Plan assigns at the ‘D’ digit level in certain 4+6 areas.</p> <p>While historically helpful to BT customers trying to work out their local calling area, the subdivision of these area codes no longer appears to serve any useful purpose and instead places a constraint on the efficient use of numbers. It theoretically requires smaller operators to be allocated two numbering blocks where one would otherwise suffice and limits portability of numbers within the area code.</p> <p>This change would also be consistent with the consultation’s suggestion that operators should have flexibility in defining the areas covered by each area code. It should also be noted that several operators disregard the distinction already.</p> <p>The areas where location significance is specified by ‘D’ digit level are: 01229, 01339, 01388, 01423, 01430, 01434, 01437, 01507, 01686, 01847, 01890, 01964, 01975. It may also be sensible to apply the same principle in the 0191 area.</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>Yes. Revenue sharing appears to benefit only a small number of people exploiting loopholes. It is clearly distorting the market and may harm consumers if operators start reducing or restricting bundled minutes as a response.</p>

