

## Consultation response form

Please complete this form in full and return to [futureofnumberingteam@ofcom.org.uk](mailto:futureofnumberingteam@ofcom.org.uk).

<b>Consultation title</b>	Future of telephone numbers: Further consultation on revenue sharing, including proposed modifications to the National Telephone Numbering Plan
<b>Full name</b>	██████████
<b>Contact phone number</b>	██████████
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Colt Technology Services
<b>Email address</b>	██████████

## Your response

<b>Question</b>	<b>Your response</b>
<b>Question 3.1</b> Do you agree with our proposals to prohibit direct and indirect revenue sharing with called parties (end-users) on the category 1 number ranges, including UK geographic numbers?	Colt has a few customers that will be impacted by Ofcom's proposed changes in relation to category 1 number range. As a result, there would be some unfavorable commercial consequences for Colt and those consumers, especially given that we have not observed any fraudulent activity among those few customers.

<p>Please provide reasons for your view and any relevant evidence.</p>	<p>Therefore, we are not in favour of this prohibition. Should Ofcom proceed with the proposed modifications, it is imperative to clarify that we would require a longer period of time to adapt to the new changes in order to guarantee compliance.</p> <p>Moreover, if such proposed changes were to be applied to Category 1, we believe it is only acceptable to re-examine the regulations and impose such prohibition to mobile calls of 07 number range also; otherwise, fixed-only operators who have previously provided revenue sharing over category 1 numbers may face discrimination. Customers may choose to transfer to mobile operators instead of 09 numbers. Imposing such modification on category 1 numbers but not on 07 number range might prejudice against fixed-line operators.</p>
<p><b>Question 3.2</b> Do you agree with our proposals to prohibit direct and indirect revenue sharing with only calling parties on the category 2 number ranges, namely 084 and 087 numbers. Please provide reasons for your view and any relevant evidence.</p>	<p>No comment, Ofcom's approach is clear.</p>
<p><b>Question 3.3</b></p> <ul style="list-style-type: none"> <li>(a) Do you consider that there is a need to introduce revenue sharing rules for UK 07 mobile phone calls?</li> <li>(b) Do you have any view on the appropriateness or benefits of applying such rules also to UK 07 SMS/MMS text and media messages, including to remove a possible incentive for misuse or artificial generation of text message traffic?</li> <li>(c) Do you have any views on the impact of such a measure on legitimate SMS/MMS-based services?</li> <li>(d) Do you have any views on whether there would be an increased risk of revenue sharing on the 07 range in light of the other proposals set out in this consultation?</li> </ul> <p>Please provide reasons for your view and any relevant evidence.</p>	<p>N/A</p>
<p><b>Question 3.4</b></p>	<p>Colt believes that implementing Ofcom's recommended strategy will take a long time,</p>

**Do you agree with our proposed approach to implementation in giving six months after the publication of our final decision before our new rules come into force?**

**Please provide reasons for your view and any relevant evidence.**

thus six months after the final decision is published may not be a sufficient amount of time. This process must be thoroughly examined prior to the execution. Furthermore, a close working relation with a number of customers will be necessary. Therefore, we believe that Ofcom should allow time for new measures to take effect and to have a progressive approach to regulatory involvement. We would suggest 18 months for the implementation of such changes.

**Question 4.1**

**Do you agree with our proposal to amend the Numbering Plan to remove the 082 number range?**

Given that Colt has already returned and removed the 082 number range, we support Ofcom's request to make the aforementioned changes to the Networking Plan.

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