

Consultation response form

Question	Your response
Question 3.1 Do you agree with our proposals to prohibit direct and indirect revenue sharing with called parties (end-users) on the category 1 number	Yes, I agree with the proposal to prohibit revenue sharing both directly and indirectly. However, I see no need to continue with the
ranges, including UK geographic numbers?	following number ranges: 055, 056, 070 and 076.
Please provide reasons for your view and any relevant evidence.	The 055/056 range was used originally by VoIP providers however VoIP calls are now available via 01/02/03 number ranges, and indeed 084/087 numbers. The industry no longer needs to take a share of the revenue from number ranges called by other users. Allowing revenue sharing creates the opportunity for the numbers to be misused "cash for calls" and for the callers be excessively charged for calling these numbers.
Question 3.2 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.	Yes, I agree, 084/087 numbers should be prohibited from any revenue sharing options. Whist there is a market for end users to make money from calls to 084/087 numbers this can negatively impact the caller who is usually charged for these calls as they are not included in any calling plans. The current charging method for these calls is also very confusing for the end user despite being "simplified" by Ofcom previously. I am saddened that Ofcom has not taken this opportunity to remove the range entirely.
Question 3.3 (a) Do you consider that there is a need to introduce revenue sharing rules for UK 07 mobile phone calls? (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?	A: I do not consider a need a revenue sharing for 07 Mobile calls. This would (as per 084/087 numbers) introduce the opportunity for "cash for calls" and the caller being over charged. B: I see not benefit to most users for there being any revenue sharing imposed on SMS/MMS messages. Such a proposal could result in a similar situation to "cash for calls" being implemented and could result in more texts being sent unnecessarily.

 (c) Do you have any views on the impact of such a measure on legitimate SMS/MMS-based services? (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 	C: As above, this could result in an unnecessarily increased number of messages being sent. At present many organisations use SMS as a legitimate and fast communication method with their clients and customers. I know my employer (a local council) uses SMS to contact their housing tenants, which is effective
this consultation?	and inexpensive.
Please provide reasons for your view and any relevant evidence.	D: Preventing revenue sharing on other number ranges could result in the interest in revenue sharing on the 07 range being increased, and this would need to be managed appropriately and prevented.
Question 3.4 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?	I see no reason to have to wait 6 months for the new rules to come into force, IF they can be introduced in a shorter time frame such as 3 months or less.
Please provide reasons for your view and any relevant evidence.	The sooner the rules were introduced the sooner the current status quo could be changed. This could be a positive impact on those calling these numbers.
Question 4.1 Do you agree with our proposal to amend the Numbering Plan to remove the 082 number range?	I agree with the proposal to remove the 082 number range assuming it is no longer used.

Please complete this form in full and return to $\underline{\text{futureofnumberingteam@ofcom.org.uk}}.$