

## Consultation response form

### About Telecom2

Telecom2 are a voice network carrier with offices in London and Spain. Through the group of companies our focus is to at the forefront of technology, specialising in VoIP B2B and call centre solutions. T2 also specialise in micro payments across mobile, card services and age verification.

Telecom2 has a broad spectrum of clients including a number of Contact Centres, Print media companies, TV companies and a Premiership Football club.

We also still have some of the traditional clients on 09 PRS running Adult, Psychic and Competition services.

We are PCI DSS compliant and have achieved the ISO 27001 and Cyber Essentials Certified Plus standards

We welcome this opportunity to contribute to the formal consultation exercise. Our comments are based on internal knowledge and discussions with clients

While it is not directly relevant to this consultation we must take issue with the statement in 3.68 of the consultation:

“Since it is time-consuming and difficult for communications providers to investigate and confirm AIT”

Our experience is that allegations of any type of AIT are rarely proven to the level required of the SIA and that the notices and support often do not meet the requirements of the BT SIA but OCPs simply stonewall until the cases are time expired and deemed resolved in the OCP’s favour. The cost of litigation to recover money withheld due to alleged AIT is often too high to make it worthwhile but when it is entered into it is usually successful. OFCOM’s expectation was that BT would support the smaller Terminating Operators but this doesn’t happen.

It is suggested in 3.69 and 3.70 that OCPs impose fair use policies. This is a normal accepted commercial precaution against over use by consumers in many industries where low cost or free services are offered but OCPs rarely, if ever, make use of them even where they exist in their agreements with consumers.

Question	Your response
<p><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?</p> <p>Please provide reasons for your view and any relevant evidence.</p>	<p>Confidential? – N</p> <p>We have no issue with this proposal</p>

**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.**

Confidential? – N

We are not convinced that this change is required. As far as we are aware, the level of complaints about services sharing revenue with callers is minimal, and changing the rule amounts to a sledgehammer to crack a nut.

The level of traffic to these services is not material within the totality of traffic in bundles and we do not believe that OCPs would in fact amend their pricing to allow for it. We are not aware of any OCPs implementing their fair use policy, an indication that the levels of traffic are not significant.

We do have a major concern regarding the use of these numbers for pay for product and competitions. We understand the rationale behind the proposal but moving these services to 09 numbers will impact on the take up of the services. 09 numbers are perceived as being very expensive, access charges make this worse, and this will deter people from using them. We agree with AIMM's suggestion that the real reason many OCPs are against calls for cash schemes is that they are unable to levy access charges.

**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?**
- (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 this consultation?**

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

Confidential? – N

- (a) We do not see any benefit from introducing revenue sharing rules on mobile numbers
- (b) We do not feel at this stage that there would be any benefit to applying revenue share rules to SMS/MMS services. The potential for AIT on these services is outweighed by the effort involved in building them and evading due diligence requirements
- (c) As stated in the consultation, there is a genuine benefit from the limited revenue share opportunities on SMS/MMS in that they can defray the cost of providing some services, particularly Business services.
- (d) We do not feel that there is any material increased risk of revenue sharing on 07 mobile numbers, revenues are so low that there is no room for sharing. We would have seen

	<p>this taking place already if there was genuine scope for it.</p>
<p><b>Question 3.4</b>  <b>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?</b></p> <p><b>Please provide reasons for your view and any relevant evidence.</b></p>	<p>Confidential? – N</p> <p>Six months should be adequate for implementation of the new rules.</p>
<p><b>Question 4.1</b>  <b>Do you agree with our proposal to amend the Numbering Plan to remove the 082 number range?</b></p>	<p>Confidential? – N</p> <p>We have no objection to the removal of the 082 number range.</p>

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