

Consultation response form

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

Consultation title	Future of telephone numbers: Further consultation on revenue sharing, including proposed modifications to the National Telephone Numbering Plan
Full name	
Contact phone number	
Representing (delete as appropriate)	Self Organisation
Organisation name	Hutchison 3G UK Limited
Email address	

Your response

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 ranges, including UK geographic numbers?	Yes – we support changes that aim to reduce consumer harm and avoid the risk of unexpected charges.

<p>Please provide reasons for your view and any relevant evidence.</p>	
<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.</p>	<p>Yes – we support changes that aim to reduce consumer harm and avoid the risk of unexpected charges.</p>
<p>Question 3.3</p> <p>(a) Do you consider that there is a need to introduce revenue sharing rules for UK 07 mobile phone calls?</p> <p>(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?</p> <p>(c) Do you have any views on the impact of such a measure on legitimate SMS/MMS-based services?</p> <p>(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?</p> <p>Please provide reasons for your view and any relevant evidence.</p>	<p>a) We do not believe revenue sharing rules are necessary for UK 07 mobile phone calls.</p> <p>b) We do not see any benefit in restricting revenue sharing on UK 07 SMS/MMS text and media services as there is no evidence that it is causing consumer harm. I</p> <p>c) Prohibiting revenue sharing to combat AIT would inevitably have a negative impact on legitimate SMS/MMS based services. As stated in Section 3.86 of Ofcom’s Consultation, some services are funded by a revenue share model and only exist because the revenue share keeps the service running and makes it commercially viable. If that is taken away, those services may become unsustainable.</p> <p>d) We do not envisage any increased risk of revenue sharing on 07 numbers as a result of other proposals set out in Ofcom’s Consultation.</p>
<p>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? Please provide reasons for your view and any relevant evidence.</p>	<p>Yes, 6 months from the date of Ofcom’s statement is a reasonable period of time to implement any new rules.</p>
<p>Question 4.1 Do you agree with our proposal to amend the Numbering Plan to remove the 082 number range?</p>	<p>N/A as Three do not own any of these number ranges.</p>

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