

## Consultation response form

Please complete this form in full and return via email to [gcreview@ofcom.org.uk](mailto:gcreview@ofcom.org.uk) or by post to:

Selene Rosso  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

<b>Consultation title</b>	Review of the General Conditions of Entitlement
<b>Full name</b>	Alan Partington
<b>Contact phone number</b>	██████████
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Telecom2 Ltd
<b>Email address</b>	██████████
<b>We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)</b>	Nothing/
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes/

## Your response

<b>Question 1: Do you agree with our proposal for updating the direction issued by Oftel (one of Ofcom's predecessors) in 2003 which specifies which public bodies may request industry to make arrangements for the restoration of communications services in the event of disasters? If not, please give reasons.</b>	Confidential? – N While we have no objection to the change, we would want "local authorities" to be more tightly defined. While there is a generally recognised view of what constitutes a local authority this is open to challenge and misuse.
<b>Question 2: Do you agree with the proposed extension of Ofcom's power to withdraw numbers where they are used inconsistently with the Numbering Plan or otherwise misused? If not, please explain why you do not agree giving reasons.</b>	Confidential? –N We agree in principle with this extension but there may be circumstances where there is "benevolent" misuse, for example to provide services to people who for political and/or personal safety reasons may not be able to access those services provided on numbers

	<p>traditionally used for them, as currently takes place. If this proposed extension is implemented we would expect it to be accompanied by an independent appeal procedure to ensure that reasonable departures from the Numbering Plan are catered for. Where there is fraud or other non good faith misuse of numbers we would want to see a high standard of evidence required and again an independent appeal process. The AIT process is currently subject to high levels of abuse with business affecting large sums of money being withheld for spurious or even no reasons, presumably for cash management or anti competitive reasons. We wouldn't want these practises carried over to this process where number ranges are withdrawn on the basis of unsound or malicious allegations by CPs.</p>
<p><b>Question 3: Do you have any comments on the proposed extension of Ofcom's Guidance under condition C1 to cover contract termination procedures? If you do not agree with the proposed extension, please explain why.</b></p>	<p>Confidential? – N</p> <p>The guidance is clear and useful and will promote good practice amongst CPs and aid competition. That it isn't prescriptive is helpful, it gives CPs some freedom in how they deal with leaving customers.</p>

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