



## **Virgin Media's response to Ofcom's consultation on Ofcom's further powers to withdraw numbers**

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".*

Virgin Media does not have any policy objections to Ofcom's proposed extension to its powers to withdraw numbers which are misused, as per Ofcom's proposed wording in GC B1.18.

However, we think Ofcom needs to consider the following practical questions which concern implementation and which would merit further clarification or guidance:

- Ofcom should set out how it will manage a scenario where the misuse is not perpetrated by the end user but rather by the CP. In such cases, Ofcom needs to have a process, including if necessary transitional arrangements, to ensure that the withdrawal of the number or range does not negatively impact the end user who may be the innocent party.
- Ofcom should set out the process that it will follow if it decides to invoke GC B1.18. For example, what will be the process if another CP, who was not aware of the misuse, has ported the number range in question? That CP would need the range to stay live to ensure continuity of service for its customer. The customer should not lose its number just because a third party CP has, for example, mis-sold to others in the same range – and Ofcom's process would need to factor this in to any decision to withdraw. If Ofcom proceeds with withdrawal, it will need to notify all parties in the chain. If the customer, or the CP who has ported in the number, is not involved in the misuse, Ofcom should set out a reasonable timeframe for migration to a new number or range.
- If Ofcom is proposing to withdraw an entire number range, would Ofcom consult on its proposals?
- Ofcom needs to clarify if they expect other CPs to take action if Ofcom invokes this GC. For example, currently, Virgin Media operates a default routing system and in most cases would take no action if another CP had a range withdrawn, (i.e. Virgin Media would not actively cease the range in our network).
- Do withdrawn ranges undergo some period of quarantine before being reallocated to a new operator?

Virgin Media has no further comments on Ofcom's proposals.

**Virgin Media**  
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