

Response to: Telephone numbering - Proposed modifications to the National Telephone Numbering Plan, General Condition 17 and telephone number applications forms within existing numbering policy

Q1. Your approach makes sense.

Q2. I have no view on this question.

Q3. I have no comments to make on this question.

Q4. I have no comments to make on this question.

Q5:

With regard to B3.1.2/B3.1.3

I can't help thinking that B3.1.2/B3.1.3 would become clearer if they were somehow merged, and a table was provided for the exceptions.

While only the "01202" code is currently planned to have local dialling closed, my understanding is that Ofcom expect the same thing to happen to more codes in the next few years. Clearly, as and when such changes are made, additional text will need to be added to these sections to reflect that.

If the dialling codes were specified in tabular form, the only change required in future would be to add additional rows to an existing table.

SUGGESTED RE-WORDING:

B3.1.2 Geographic Numbers shall not be Adopted or otherwise used other than where Calling Parties with Geographic Numbers with the same Geographic Area Code as the Called Party are able to dial using only the Local Number except where:

a. those numbers are National-Dialling-Only Numbers – see B3.1.5 below;
or

b. Calling Parties are dialling from Geographic Numbers specified in the table below, from the dates stated in the table.

B3.1.3 Local Dialling shall not be provided from Geographic Numbers with Geographic Area Code stated in the table below from the date stated in the table.

| Area Code | Effective Date |
|-----------|-------------------|
| 01202 | 1st November 2012 |

The wording of B3.1.7:

Geographic Numbers that relate to a Standard Area are Allocated in blocks of 10,000 but shall be treated for the purposes of this paragraph as ten (10) successive units of 1,000 numbers each. A Communications Provider shall only assign a number from a particular 1,000 number unit to a Subscriber if a substantial proportion of numbers in the preceding 1,000 number units have already been so assigned.

implies that numbers must be allocated first from unit '0' (i.e. the numbers 0xxx); then from unit '1' when unit '0' is substantially full; then from units '2', '3', etc. Is this the intention? Or is it permissible for CPs to allocate numbers from (say) 6xxx first, then 8xxx, then 1xxx, etc?

Is there a reason why a similar process to B3.1.7 might not also be applied in the Conservation Areas (B3.1.6); i.e. that the allocation of blocks of 1,000 numbers should not be treated as ten successive blocks of 100 numbers? This would facilitate the freeing up of numbers in the future if required to avoid closure of local dialling in areas if they run short of numbers. Some smaller CPs will have very few (if any) customers in some area codes (particularly if they have numbers assigned in a large number of areas so they can advertise "UK-wide" number availability).

Do these rules apply to blocks of numbers already allocated to CPs? In a case where a CP has a 10,000-number block allocated to it, but has 1,000-number sub-blocks as yet unused, should Ofcom be encouraging/requiring that CP to not use such sub-blocks until they can be justified under B3.1.7? (Requiring this approach could also increase the number of blocks which might be handed back to Ofcom to avoid areas running out of numbers in the future.)

Q6. I have no view on this question.

Q7. I have no view on this question.

Q8. I have no view on this question.

Q9. I have no view on this question.