

Title:

Mr

Forename:

Edward

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Pickering

Representing:

Organisation

Organisation (if applicable):

Missing People

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What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Question 1: Do you agree that communications provider / single or multiple service provider partnerships are the most appropriate parties to apply for allocation of 116 numbers? :

Yes, but this raises further timescale issues addressed in our response to Question 3. Missing People would also like to raise the issue of the definition of a 'communications provider' - are Ofcom expecting the joint application to involve a large telco (such as BT, NTL, Cable and Wireless etc.) or a smaller 'reseller' company (which many organisations may already use to provide other Freephone services)? Due to the new nature of the 116xxx numbers it may be very difficult for a 'reseller' to deliver the number and large telcos tend not to do business with smaller organisations.

Question 2: Do you agree that a comparative selection process is the most appropriate way of determining applications for 116 numbers? :

Yes.

Question 3: Do you have any comments on the proposal for a 'call for interest' period? Do you think that six weeks allows sufficient time to make a submission of interest?:

Missing People agrees in principle with the 'call for interest' period, but has concerns about the short length of this period. Six weeks is not enough time to negotiate with possible partners, funders and communication providers.

If a multiple service provider application is proposed, then defining and agreeing responsibilities between service providers is likely to be time consuming. Once this is agreed, multiple funders may have to be approached (possibly separately by each service provider) as well as negotiations with communications providers. Missing People does not believe that 6 weeks is sufficient to do this. Missing People suggests that 6 months would be a more practical timescale.

If only a single service provider model was adopted, then Missing People believe that 3 months would be a practical timescale.

Question 4: Do you have any comments on the proposal for Government coordinated advisory committees to assist Ofcom with the 116 number allocation process? Do you have any views on the possible membership of the advisory committees? :

Missing People broadly welcomes the proposal for Government coordinated advisory committees to assist with the 116xxx number allocation process. Whilst it may be advantageous to include NGOs from relevant fields within the membership of these groups, care should be taken not to introduce conflicts of interest into the allocation process.

Question 5: Do you have any comments on Ofcom's assessment of the three charging options for 116 numbers? :

The consultation does not appear to consider the funding issues that NGOs or similar organisations will face to fund the call costs of 116 numbers. At best, an organisation may be able to negotiate 'at cost' charging with their communications provider, but this will still leave them to absorb the cost of calls. This will therefore require external

funding (which is both difficult to find and apply for even in our proposed 3/6 month window), which the consultation does not appear to address.

Question 6: Do you agree with Ofcom's conclusion that Charging option 3 - 116 numbers are either 'freephone' or 'free to caller' on an individual basis is the most appropriate option?:

Ofcom should consider insisting that calls are routed for free across all networks for the three initial 116 numbers (in the same way described for 112 and 999 in Section 5.11) as this would mitigate against either no take-up of service or service ceasing due to lack of funding. For example, the French and Belgium authorities have designated the 116000 number as an 'emergency service' and treat it the same as 112.

Question 7: Do you agree with the suggested factors for deciding whether a service should be 'freephone' or 'free to caller'? Do you think any other factors should be taken into account?:

The concept of an 'emergency service' should also be considered - see comments for Question 6 above.

Question 8: Do you agree that the initial three 116 services (116000 hotline for missing children, 116111 child helplines, 116123 emotional support helplines) should be 'free to caller'? If not, please give your reasons.:

Ofcom should consider insisting that calls are routed for free across all networks for the three initial 116 numbers (in the same way described for 112 and 999 in Section 5.11) as this would mitigate against either no take-up of service or service ceasing due to lack of funding. For example, the French and Belgium authorities have designated the 116000 number as an 'emergency service' and treat it the same as 112. If this option is discarded, then Missing People believe that 'free to caller' is the next best alternative.

Question 9: Do you have any comments on the Impact Assessment on the options for allocation of 116 numbers and charging arrangements? Do you agree with Ofcom's conclusions?:

Missing People have no comments.

Question 10: Do you have any specific comments on the proposed modifications to the Numbering Plan, Numbering Condition and/or the access code application form as set out in Annexes 11 to 13?:

No.

Comments: