

Title: Mr

Forename: Robert

Surname: O'Donnell

Representing: Self

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

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?

I am be concerned that there is a strong possibility that potential service providers may not be aware of a numbers pending release, and thus six weeks is a very short period to discover the availability, and formulate an application.

I would think that this would only be sustainable should the numbers availability be promoted in advance heavilly, or direct approaches be made to a significant proportion of the organisations currently providing a suitable service.

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? :

no

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

I recommend option 2, making the entire 116 range "free to caller".

The problem is that doing otherwise would ensure that there was no price transparency in the range. It is a major problem in existing number ranges that some calls cost more than others. How many people do you know who would be able to tell you how much a given 0844 call would cost you? How much a particular 118 number would cost? By giving the mobile operators licence to charge "freephone" rates or up to 40p/min for some numbers will tar the whole range. Nobody will be sure how much a given call will cost.

Legislating for the call price as "freephone" or "free to caller" to be given will not help, as both of these can be taken to mean the same thing by someone not versed in call tariffs, such as the very children 116111 is aimed at. In any case, both of these terms will be misapplied immediately. Look, for instance, at the continued abuse of the terms "local call rate" and "national call rate" which I am constantly seeing, and occasionally forwarding to the ASA, many years after these ceased to have any meaningful relationship to typical local/national geographic calls, and I have even seen them used to describe 0844 & 0871 numbers.

If you do not make the whole range "free to caller" under all circumstances, you waste the whole point of making them free in the first place. Nobody will be sure of the call costs, and it is possible that callers will be put off calling due to uncertainty as to if they can afford the call.

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?:

No. Please see answer to Q5 above for the reasons.

I would suggest that to mitigate the costs of calls to the service provider, that the mobile telecoms operators forwarding on these calls not be allowed to charge more than the landline operators for handling the call. This may need legislation regarding their interconnect agreements.

Sorry I am not an industry professional and so do not know the exact terms for the particular agreements that would be affected.

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?

As per my answer to Q5, I think all services offered on the range should be "free to caller", therefore I disagree with this question.

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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.

I agree that these should indeed be "free to caller".

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?

I believe allocation option 4 would be most beneficial, as it allows for both the continuance of service should an individual provider find themselves unable to continue to provide a service, and allows for organisations that are actually loose affiliations of independent helpline providers, sometimes just operating in local areas, to jointly provide a service.

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:

no