

Elizabeth Greenberg
Ofcom
Riverside House
2A Southwark Bridge Road
London
SE1 9HA

10 December 2008

Dear Elizabeth

Harmonised European Numbers for Services of Social Value

From T-Mobile's perspective the implementation of 116 numbers is no different from the existing 0800 arrangements in so far as the terminating operator hosting the 116 service provider will be responsible for the commercial/interconnect arrangements with both transit and originating operators. For T-Mobile to make particular 116 numbers 'free to caller' would depend upon those commercial arrangements. T-Mobile has no objection to the initial three 116 services (116000 hotline for missing children; 116111 child helplines; 116123 emotional support helplines) being 'free to caller' as long as the commercial arrangements covering the relevant fees are in place, otherwise it would not be commercially viable to do so. As regards other 116 services, Ofcom should allow the networks to decide which are 'free to caller' and which are treated as other call types as part of the normal course of business. We do not believe that regulatory intervention is required.

Yours sincerely



Gulistan Moledina
Regulatory Manager