



Conserving geographic numbers

Proposals for geographic number conservation
measures in additional areas

Consultation

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Section 1

Summary

- 1.1 The purpose of this document is to consult on Ofcom's (the Office of Communications) proposals for the conservation of geographic numbers in 27 geographic area codes in addition to existing conservation measures. The proposals are designed to ensure the ongoing availability of geographic number blocks to meet communications providers' needs.
- 1.2 This document is solely concerned with the designation of new areas in need of geographic number conservation measures. This is not a consultation on changes to geographic numbers. The proposals have no adverse impact on consumers. On the contrary, they benefit consumers by ensuring that sufficient and appropriate numbers are available in all geographic areas thus promoting competition in the provision of communications services.
- 1.3 Ofcom is responsible for the publication of the National Telephone Numbering Plan ("the Plan"), which sets out numbers available for allocation and any restrictions on their adoption or use, including the designation of conservation areas and its affect on number allocation and use. Ofcom must follow certain statutory procedures when it proposes to make changes to the Plan. This consultation document fulfils the statutory procedure in proposing the necessary changes to the Plan to reflect the proposals for geographic number conservation measures.
- 1.4 It is Ofcom's duty to ensure that the best use is made of the UK's numbering resource and to encourage efficiency and innovation for that purpose, thus ensuring sufficient and appropriate telephone numbers and codes are available to provide communications services to consumers. Increased competition and evolving services have created an increase in demand for geographic numbers. This has resulted in a scarcity of numbers in some geographic areas. To ensure the continued availability of numbers, and thereby supporting competition, consumer choice and innovation in service provision, conservation measures are necessary in certain areas.
- 1.5 This document, therefore, consults on proposals to extend conservation measures to additional geographic areas. The proposal is to give conservation status to a further 27 geographic area codes, in addition to the 51 existing conservation areas, enabling numbers in those areas to be allocated to communications providers in smaller blocks. This would extend the life of number blocks in those areas by reducing the rate at which numbers are allocated and aligning the size of allocation more closely to demand.
- 1.6 The proposal to maintain the supply of telephone numbers set out in this consultation document are the measures required to ensure the ongoing supply of numbers within established policy. It is consistent with the policy aims reaffirmed as part of the Numbering Policy Review¹ and the specific proposals set out in the associated consultation document *Telephone Numbering: Safeguarding the future of numbers*.
- 1.7 This consultation seeks responses to the specific consultation questions set out in the document and general comments during the one month consultation period, which ends at 5pm on 26 June 2006. The Communications Act 2003 ("the Act") states that one month is the minimum period for consultation on modifications to the

¹ The Numbering Policy Review is Ofcom's review of the long term plan for the UK's telephone numbers. A consultation document *Telephone Numbering: Safeguarding the future of numbers*, was published on 23 February 2006. <http://www.ofcom.org.uk/consult/condocs/numberingreview/>

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Plan. Ofcom has decided not to extend the consultation period beyond the statutory requirement because the proposals only directly relate to applicants for telephone numbers, not the public at large, thus the changes proposed are limited in scope and relate only to existing policy and policy documents (i.e. the Plan).

Section 2

Introduction

The need for this consultation

- 2.1 Ofcom is responsible for the publication of the Plan and the administration of the UK's National Numbering Scheme ("the Scheme"). The Plan sets out numbers available for allocation and any restrictions in their adoption or use, while the Scheme provides the day-to-day record of the status of telephone numbers in the UK. It is Ofcom's duty, as set out in section 63 of the Act, to ensure that best use is made of the UK's numbering resource and to encourage efficiency and innovation for that purpose, thus ensuring sufficient and appropriate telephone numbers are available to provide communications services to consumers.
- 2.2 Where the supply of blocks of numbers required for the provision of communications services is limited, it is Ofcom's duty to rectify the situation. This is because a lack of available numbers would hinder competition, consumer choice and innovation in the provision of networks and services.
- 2.3 The supply of blocks of geographic numbers for allocation by Ofcom to communications providers is currently limited in some geographic areas. Therefore, Ofcom proposes to extend conservation measures to those geographic area codes which are experiencing a shortage of number blocks. This proposal would increase the supply of blocks available for allocation in geographic areas with limited availability by reducing the size of number block to units of 1,000 (1k) rather than 10,000 (10k) numbers.
- 2.4 Geographic number conservation status is recorded in the Plan. This ensures, through the provision of General Condition of Entitlement 17 ("the Numbering Condition"), that communications providers' observe the resulting restrictions in allocation and use. Therefore, Ofcom's proposals require a modification to the Plan to bring them into effect.

Links to the Numbering Policy Review

- 2.5 On 23 February 2006, Ofcom published a consultation document entitled *Telephone Numbering: Safeguarding the future of numbers* ("the Numbering Policy Review"). This document set out a number of strategic principles which are intended to inform numbering policy, plus a number of policy initiatives which are intended to address certain consumer concerns. One of the initiatives dealt with the need to ensure the ongoing supply of geographic numbers in all areas. The strategic principles which are set out in this consultation document are consistent with, and support the delivery of, the proposals set out in the Numbering Policy Review.

Section 3

Conserving geographic numbers

Introduction

- 3.1 Geographic numbers are widely recognised and trusted by consumers. They are also the type of number in most demand by communications providers. The result is pressure on the availability of geographic numbering.
- 3.2 Demand management processes, in the form of conservation measures, are Ofcom's preferred means of ensuring that the available geographic numbering resource meets demand and helps prevent the need to create additional numbers (i.e. through number changes or additional codes).
- 3.3 Conservation measures are already in place for geographic numbers in certain areas which have previously experienced a shortage of numbers. They are the established means of increasing the availability of geographic number blocks for allocation to communications providers by reducing the unit of allocation from 10k to 1k. Conservation measures work by increasing the effectiveness with which communications providers use geographic numbers.

Geographic number conservation policy

- 3.4 The UK Scheme has over 600 geographic area codes. Telephone numbers in the majority of these areas are divided into blocks of 10k for allocation to communications providers. This block size was established historically as a reasonable level at which communications providers' networks could, in terms of technical capability, interpret the digits dialled and route calls accordingly. However, many communications providers do not require 10k geographic numbers in most areas and allocation of numbers at this level is often wasteful of the resource and results in poor utilisation of numbers. By reducing the amount of numbers in a block to 1k, the number of blocks available for allocation increases tenfold. This conservation measure does not affect communication providers' access to sufficient geographic numbers to meet their needs, as blocks can be allocated in multiple units of 1k according to justified demand.
- 3.5 Two levels of conservation area have been established. The concepts are defined in the Definitions and Interpretations section of the Plan as:

“‘Conservation Area’ means a geographic area that has a realistic expectation of number exhaustion within the foreseeable future. Type A Conservation Areas are those which Ofcom believes are within two years of having less than ten spare 10,000 number blocks available. Type B Conservation Areas are those which Ofcom believes are likely to become Type A Conservation Areas within ten years.”
- 3.6 Currently there are 51 Type A Conservation Areas and five Type B Conservation Areas recorded in the Plan. Some of these areas have had conservation status since 2002, although the majority of areas were given conservation status further to Ofcom's consultation on conserving geographic numbers last year². Comments received on that consultation accepted that action was required in order to ensure

² *Conserving geographic numbers* – consultation published 17 February 2005 and statement published 14 June 2005 <http://www.ofcom.org.uk/consult/condocs/geo/>

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the ongoing availability of geographic numbers in all geographic area codes. Respondents also accepted that there was little available short term alternative to implementing conservation measures in areas experiencing a number block shortage. Ofcom considers that the *Conserving geographic numbers* statement published last year established the policy principle of geographic number conservation.

- 3.7 When designating conservation areas last year, Ofcom sought to keep the number of areas given conservation status at that time to the minimum necessary to ensure ongoing availability of numbers for the coming two years. In keeping the amount of conservation areas to a minimum, it was acknowledged that Ofcom would need to revisit the assessment of which areas required conservation measures regularly to ensure that available capacity was not exhausted. It is for this reason that Ofcom is consulting on further conservation measures just over a year after the last consultation.

Creating additional Conservation Areas

- 3.8 Since the creation of additional conservation areas in June 2005, demand for geographic numbers has generated a further set of areas that require conservation measures. This is due to an increase in the number of different communications providers entering the market for geographic numbers in many areas (see paragraph 3.15 for further detail on the impact of communications providers on number block availability). To illustrate the growth, in one proposed conservation area – 01206 Colchester – 16 new communications providers have been allocated numbers since February 2005 when the last assessment was carried out. Before February 2005, only a total of ten providers had been allocated Colchester numbers. This rapid increase in providers is demonstrated in Figure 3 below. Similar growth has occurred in many other areas and this, coupled with a limited number of blocks remaining available for allocation in the proposed conservation areas, means that intervention is required.

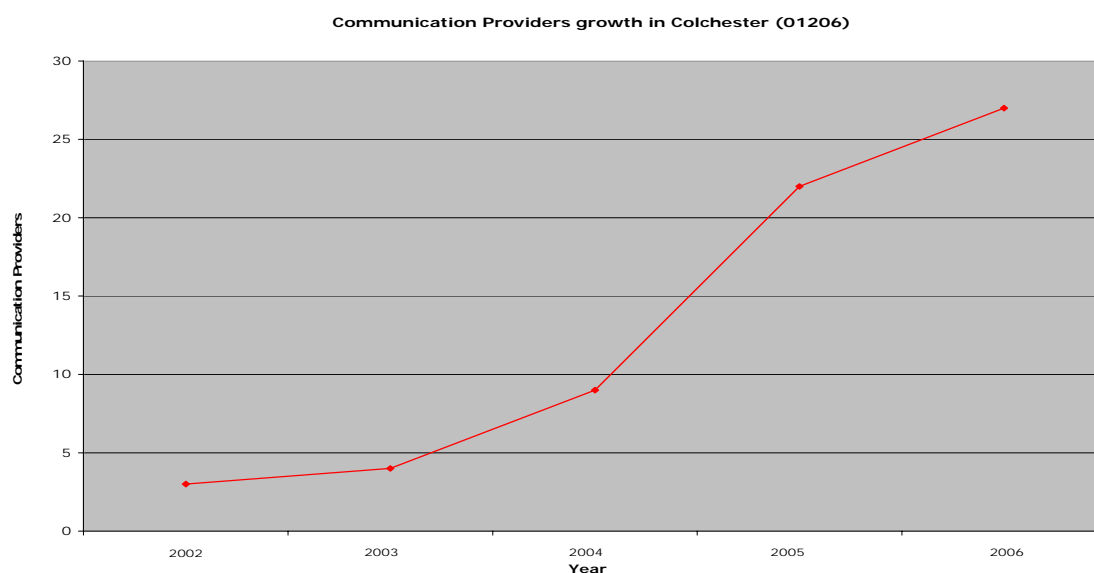


Figure 1: Growth in number of communications providers with numbers allocated in the 01206 Colchester area

- 3.9 In order to give a geographic area code conservation status, Ofcom must select those areas it considers meet the established criteria for Type A and Type B

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Conservation Areas. It must then consult on modifying the Plan so that the new conservation status is reflected and the measures, consisting of restrictions in use of numbers in conservation areas, are enforceable. These restrictions are set out in part B3.1.6 of the Plan as follows:

“Numbers in geographic areas where a Conservation Area status is indicated shall only be Adopted or otherwise used in units of 1,000 numbers at a time.”

- 3.10 The fast moving nature of the communications industry means that invariably there will be an element of speculation when trying to determine future demands on the numbering resource. However, future planning is vital to ensure that sufficient and appropriate numbers are available. Therefore Ofcom believes that the concept of future prediction of block shortage in certain geographic area codes, coupled with the instigation of measures designed to offset that shortage by increasing the supply of blocks available for allocation, is a vital tool in meeting its duties in administering the Scheme.
- 3.11 Currently, Ofcom makes an assessment using a combination of:
- a) the number of 10k blocks available for allocation to communications providers; and
 - b) demand for numbers in an area, taking into account the total numbers available, numbers in use, population, and current and predicted future demand.
- 3.12 Ofcom is looking to refine this process following the delivery of a report and forecasting model on geographic number demand from consultants Intercai Mondiale. However, in the meantime, Ofcom is confident that its current forecasting process is sufficient to predict areas that require conservation measures to ensure that sufficient numbers are available to meet demand for the next two years.

Effects of Ofcom's proposal to create additional Conservation Areas

- 3.13 Ofcom's proposals to create additional geographic number conservation areas do not have any adverse effects on consumers, rather they bring the benefits of competition and innovation by ensuring sufficient numbers are available on which to receive services. It is also important to note that the proposals do not relate to number changes nor should the proposals be taken as indication that there are insufficient numbers available to meet consumers' needs in the proposed conservation areas. On the contrary, conservation measures are designed to offset the need for supply-side measures such as number changes, which are costly and disruptive for consumers. Ofcom's expectation is that they will be successful in doing so.
- 3.14 The proposals would have an impact on the way communications providers route calls to some geographic numbers due to the need to analyse more digits. This would result in administrative and operational costs. There are also infrastructure limitations on legacy networks' ability to route at the 1k level, which is why Ofcom has introduced conservation measures in a phased manner and only where necessary. However, while Ofcom acknowledges that its geographic number conservation policy has some costs for communications providers, these are outweighed by the benefits for competition and consumer interests delivered by maintaining the supply of geographic number blocks without the need for supply-side measures. In addition, a consultancy study conducted by Intercai Mondiale on behalf

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of Ofcom concluded that there was no overarching technical reason why increased implementation of routing geographic numbers at the 1k level was not possible³.

Links to the Numbering Policy Review

- 3.15 Ofcom's proposals for additional conservation measures, as set out in this consultation, are consistent with, and support the proposals for, geographic numbers as set out in the Numbering Policy Review consultation document. That document presented Ofcom's strategic views on how to maintain continuity and availability of geographic numbers. It stated that growth in the demand for geographic numbers was not due to an underlying demand from end-users but from demand for number blocks from communications providers. Due to the need to allocate geographic numbers in large blocks, actual utilisation is generally low, on average around 15% of the block. Therefore Ofcom proposed addressing the cause of geographic number exhaustion, i.e. the low utilisation of number blocks, by increasing conservation measures and proposed that the forward-look period for conservation be extended to five years.
- 3.16 In the Numbering Policy Review consultation document, Ofcom estimated that between 55 and 77 additional conservation areas might be required (in addition to the existing 51 Type A Conservation Areas) in order to ensure ongoing availability of geographic numbers for the next five years. It is important to note that the conservation areas proposed in this document are part of, and not in addition to, that total. The rationale for the five year forward look is that Ofcom considers that the use of Next Generation Networks ("NGNs") will have a significant impact on the way that numbers are routed by removing the technical limitations that have required the allocation of numbers in large blocks and resulted in poor utilisation levels. NGNs are expected to have this effect within the next five years or so, with the result that numbers can be allocated in much smaller units.
- 3.17 Ofcom is currently consulting on its proposals for geographic numbers in the Numbering Policy Review, together with options for fall-back measures in the limited number of areas predicted to run out of numbers despite conservation measures. However, it is important that Ofcom continues with any tactical measures necessary in the administration of the Scheme during the intervening period. In particular, it is vital that Ofcom consults on implementing conservation measures in line with current number conservation policy in some area codes now in order to prevent those areas running out of 10k number blocks completely and losing the opportunity to conserve numbers in the future.

Proposed conservation areas

- 3.18 Ofcom has examined the current position of all geographic area codes without conservation status and concluded that 27 areas require Type A Conservation Area status in addition to the existing 51 areas. The proposed 27 areas to be made Type A include five areas that currently have Type B Conservation Area status. Ofcom is not proposing to give any new areas Type B status. The areas proposed are set out in the table below and in the schedule to the Notification of modification to the Plan in Annex 5.

³ *Finer digit analysis of telephone numbers for routing purposes*, published 23 February 2006
<http://www.ofcom.org.uk/consult/condocs/numberingreview/digitanalysis/>

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Area Code	Geographic Area name
1226	Barnsley
1268	Basildon
1256	Basingstoke
1225	Bath
1234	Bedford
1253	Blackpool
1276	Camberley
1245	Chelmsford
1244	Chester
1206	Colchester
1293	Crawley
1302	Doncaster
1384	Dudley
1392	Exeter
1494	High Wycombe
1484	Huddersfield
1482	Hull
1633	Newport
1706	Rochdale
1708	Romford
1709	Rotherham
1702	Southend-on-Sea
1827	Tamworth
1952	Telford
1707	Welwyn Garden City
1932	Weybridge
1905	Worcester

Figure 2: Areas proposed to become Type A Conservation Areas

Question 1: Do you agree with Ofcom's proposal for the 27 geographic area codes listed in Figure 2 to be determined as Type A Conservation Areas? Are there any codes which you think a) should not have been included in the proposal; and/or b) have been omitted? If so, please state which codes and for what reasons.

Section 4

Proposed modifications to the National Telephone Numbering Plan

The legal framework

- 4.1 Ofcom regulates the communications sector under the framework established by the Communications Act 2003 (the “Act”). The Act provides, amongst other things in relation to numbering, for the publication of the Plan and the setting of General Conditions of Entitlement relating to Telephone Numbers (“Numbering Conditions”). It also sets out statutory procedures governing the modification of the Plan.

The Plan

- 4.2 Section 56(1) of the Act states that:

"It shall be the duty of OFCOM to publish a document (to be known as "the National Telephone Numbering Plan") setting out-

- a) the numbers that they have determined to be available for allocation by them as telephone numbers;
- b) such restrictions as they consider appropriate on the adoption of numbers available for allocation in accordance with the plan; and
- c) such restrictions as they consider appropriate on the other uses to which numbers available for allocation in accordance with the plan may be put."

- 4.3 The Act provides for Ofcom to review and revise the Plan. Section 56(2) states that:

"It shall be OFCOM's duty –

- a) from time to time to review the National Telephone Numbering Plan; and
- b) to make any modification of that plan that they think fit in consequence of such a review; but this duty must be performed in compliance with the requirements, so far as applicable, of section 60."

- 4.4 Section 60 of the Act provides for the modification of documents referred to in the Numbering Conditions (which includes the Plan) and explains the procedures to be followed in order to conduct this review. Section 60(2) of the Act provides that:

"OFCEM must not revise or otherwise modify the relevant provisions unless they are satisfied that the revision or modification is -

- a) objectively justifiable in relation to the matters to which it relates;
- b) not such as to discriminate unduly against particular persons or against a particular description of persons;
- c) proportionate to what the modification is intended to achieve; and
- d) in relation to what it is intended to achieve, transparent."

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4.5 Section 60(3) further provides that:

"Before revising or otherwise modifying the relevant provisions, OFCOM must publish a notification -

- a) stating that they are proposing to do so;
- b) specifying the Plan or other document that they are proposing to revise or modify;
- c) setting out the effect of their proposed revisions or modifications;
- d) giving their reasons for making the proposal; and
- e) specifying the period within which representations may be made to OFCOM about their proposal."

Ofcom's general duty as to telephone numbering functions

4.6 Ofcom has a general duty under section 63(1) of the Act in carrying out its numbering functions

- "a) to secure that what appears to them to be the best use is made of the numbers that are appropriate for use as telephone numbers; and
- b) to encourage efficiency and innovation for that purpose."

General duties of Ofcom

4.7 The principal duty of Ofcom to be observed in the carrying out of its functions is set out in section 3(1) of the Act as the duty:

- "a) to further the interests of citizens in relation to communications matters; and
- b) to further the interests of consumers in relevant markets, where appropriate by promoting competition."

4.8 As part of the fulfilment of these principal duties, it is Ofcom's responsibility to secure the availability throughout the UK of a wide range of numbering arrangements, having regard to the interests of consumers in respect to choice, price awareness, and consumer protection.

Duties for the purpose of fulfilling Community obligations

4.9 In addition to its general duties as to telephone numbers, when considering revisions to the Plan, Ofcom must also take into account the six Community requirements in carrying out its functions as set out in section 4 of the Act. These include the requirement to promote competition in the provision of electronic communications networks and services, and the requirement not to favour one form of network, service or associated facility or one means of providing or making available such network, service or associated facility over another, as well as the requirement to promote the interests of European citizens.

4.10 The various legal tests and duties, and how Ofcom has complied with them in consulting on the proposals in this consultation document, are set out below.

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Legal tests

- 4.11 It is Ofcom's duty, when proposing a modification to the Plan, to show how it considers that its proposals comply with the legal tests in the Act.
- 4.12 The effect of the modification to the Plan would give conservation status to additional geographic areas.
- 4.13 Ofcom is satisfied that the proposal for modifications to provisions of the Plan meets the tests set out in sections 60(2) and 49(2) of the Act being:
- **objectively justifiable**, in that it relates to Ofcom's duty to publish the Plan and is justified in order to ensure the long-term availability of sufficient numbering resource to meet communication providers' requirements and to promote competition and consumer choice;
 - **not unduly discriminatory**, in that all communications providers eligible to apply for telephone numbers would be subject to the proposed modifications to the Plan;
 - **proportionate**, in that the proposed modification to the Plan is the minimum revision necessary to its provisions to conserve geographic numbers; and
 - **transparent**, in that the Notification proposing the modifications to the Plan, and its effects, are set out in this consultation document.
- 4.14 Ofcom considers that it is fulfilling its general duty as to telephone number functions as set out in section 63 of the Act in making its proposals by:
- **securing the best use of appropriate numbers**, the proposal would ensure that optimal use was made of the most limited geographic numbering resources, thus ensuring that appropriate numbers are available for allocation. The proposals are consistent with the strategy set out in the Numbering Policy Review; and
 - **encouraging efficiency and innovation**, in that the proposals ensure that sufficient and appropriate numbering resources are available to meet communication providers' demands thereby encouraging innovation. They improve efficiency in number use as they more closely align allocation to demand, thus improving utilisation rates.
- 4.15 Ofcom considers that its proposal to modify the Plan is consistent with its general duties in carrying out its functions as set out in section 3 of the Act. In particular, it considers that the proposals further the interests of citizens in relation to communications matters and consumers in relevant markets by ensuring that the supply of telephone numbers is maintained.
- 4.16 In proposing the modifications to the Plan, Ofcom has also considered the Community obligations set out in section 4 of the Act, particularly the requirement to promote the interests of all persons who are citizens of the European Union. Taking measures to conserve geographic numbers benefits citizens as they make more efficient use of the limited resource, thus offsetting the need for more disruptive measures to ensure availability, such as number changes.

Notifications of modifications to the Plan

- 4.17 The draft notifications of modifications to the Plan are set out in Annex 5 of this consultation document.

Question 2: Do you have any specific comments on the proposed modifications to the Plan?

Annex 1

Responding to this consultation

How to respond

- A1.1 Ofcom invites written views and comments on the issues raised in this document, to be made by **5pm on 26 June 2006**.
- A1.2 Ofcom strongly prefers to receive responses as e-mail attachments, in Microsoft Word format, as this helps us to process the responses quickly and efficiently. We would also be grateful if you could assist us by completing a response cover sheet (see Annex 3) and, among other things, to indicate whether or not there are confidentiality issues. The cover sheet can be downloaded from the 'Consultations' section of our website.
- A1.3 Please can you send your response to first elizabeth.greenberg@ofcom.org.uk
- A1.4 Responses may alternatively be posted or faxed to the address below, marked with the title of the consultation:
Elizabeth Greenberg
4th Floor, Riverside House
2A Southwark Bridge Road
London SE1 9HA
Fax: 020 7783 4109
- A1.5 Note that we do not need a hard copy in addition to an electronic version. Also note that Ofcom will not routinely acknowledge receipt of responses.
- A1.6 It would be helpful if your response could include direct answers to the questions asked in this document, which are listed together at Annex 4. It would also help if you can explain why you hold your views, and how Ofcom's proposals would impact on you.

Further information

- A1.7 If you want to discuss the issues and questions raised in this consultation, or need advice on the appropriate form of response, please contact Elizabeth Greenberg at elizabeth.greenberg@ofcom.org.uk

Confidentiality

- A1.8 Ofcom thinks it is important for everyone interested in an issue to see the views expressed by consultation respondents. We will therefore usually publish all responses on our website, www.ofcom.org.uk, ideally on receipt (when respondents confirm on their response cover sheet that this is acceptable).
- A1.9 All comments will be treated as non-confidential unless respondents specify that part or all of the response is confidential and should not be disclosed. Please place any confidential parts of a response in a separate annex, so that non-confidential parts may be published along with the respondent's identity.
- A1.10 Ofcom reserves its power to disclose any information it receives where this is required to carry out its legal requirements. Ofcom will exercise due regard to the confidentiality of information supplied.

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- A1.11 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use, to meet its legal requirements. Ofcom's approach on intellectual property rights is explained further on its website, at www.ofcom.org.uk/about_ofcom/gov_accountability/disclaimer.

Next steps

- A1.12 Ofcom intends to publish a statement shortly after the end of the consultation period.
- A1.13 Please note that you can register to get automatic notifications of when Ofcom documents are published, at http://www.ofcom.org.uk/static/subscribe/select_list.htm.

Ofcom's consultation processes

- A1.14 Ofcom is keen to make responding to consultations easy, and has published some consultation principles (see Annex 2) which it seeks to follow, including on the length of consultations.
- A1.15 The period of time for responses to this consultation is one month, as required by section 60(4) of the Act. Ofcom has not extended the period of consultation beyond the statutory requirement as the issues covered only directly affect applicants for telephone numbers, not the public at large, thus the changes proposed are limited in scope and relate only to existing policy and policy documents (i.e. the Plan).
- A1.16 If you have any comments or suggestions on how Ofcom conducts its consultations, please call our consultation helpdesk on 020 7981 3003 or e-mail us at consult@ofcom.org.uk. We would particularly welcome thoughts on how Ofcom could more effectively seek the views of those groups or individuals, such as small businesses or particular types of residential consumers, whose views are less likely to be obtained in a formal consultation.
- A1.17 If you would like to discuss these issues, or Ofcom's consultation processes more generally, you can alternatively contact Vicki Nash, Director, Scotland, who is Ofcom's consultation champion:
Vicki Nash
Ofcom (Scotland)
Sutherland House
149 St. Vincent Street
Glasgow G2 5NW
Tel: 0141 229 7401

Fax: 0141 229 7433
E-mail: vicki.nash@ofcom.org.uk

Annex 2

Ofcom's consultation principles

A2.1 Ofcom has published the following seven principles that it will follow for each public written consultation:

Before the consultation

A2.2 Where possible, we will hold informal talks with people and organisations before announcing a big consultation to find out whether we are thinking in the right direction. If we do not have enough time to do this, we will hold an open meeting to explain our proposals shortly after announcing the consultation.

During the consultation

A2.3 We will be clear about who we are consulting, why, on what questions and for how long.

A2.4 We will make the consultation document as short and simple as possible with a summary of no more than two pages. We will try to make it as easy as possible to give us a written response. If the consultation is complicated, we may provide a shortened version for smaller organisations or individuals who would otherwise not be able to spare the time to share their views.

A2.5 We will normally allow ten weeks for responses to consultations on issues of general interest.⁴

A2.6 There will be a person within Ofcom who will be in charge of making sure we follow our own guidelines and reach out to the largest number of people and organisations interested in the outcome of our decisions. This individual (who we call the consultation champion) will also be the main person to contact with views on the way we run our consultations.

A2.7 If we are not able to follow one of these principles, we will explain why. This may be because a particular issue is urgent. If we need to reduce the amount of time we have set aside for a consultation, we will let those concerned know beforehand that this is a 'red flag consultation' which needs their urgent attention.

After the consultation

A2.8 We will look at each response carefully and with an open mind. We will give reasons for our decisions and will give an account of how the views of those concerned helped shape those decisions.

⁴ However, as stated in paragraph 1.7, the consultation period for this specific consultation is one month ending at 5pm on 26 June 2006. This fulfils the statutory requirement for a one month consultation on modifications to the Plan. The consultation period has not been extended beyond this as the issues only directly relate to applicants for telephone numbers, not the public at large, thus the changes proposed are limited in scope and relate only to existing policy and policy documents (i.e. the Plan).

Annex 3

Consultation response cover sheet

- A3.1 In the interests of transparency, we will publish all consultation responses in full on our website, www.ofcom.org.uk, unless a respondent specifies that all or part of their response is confidential. We will also refer to the contents of a response when explaining our decision, without disclosing the specific information that you wish to remain confidential.
- A3.2 We have produced a cover sheet for responses (see below) and would be very grateful if you could send one with your response. This will speed up our processing of responses, and help to maintain confidentiality by allowing you to state very clearly what you don't want to be published. We will keep your completed cover sheets confidential.
- A3.3 The quality of consultation can be enhanced by publishing responses before the consultation period closes. In particular, this can help those individuals and organisations with limited resources or familiarity with the issues to respond in a more informed way. Therefore Ofcom would encourage respondents to complete their cover sheet in a way that allows Ofcom to publish their responses upon receipt, rather than waiting until the consultation period has ended.
- A3.4 We strongly prefer to receive responses in the form of a Microsoft Word attachment to an email. Our website therefore includes an electronic copy of this cover sheet, which you can download from the 'Consultations' section of our website.
- A3.5 Please put any confidential parts of your response in a separate annex to your response, so that they are clearly identified. This can include information such as your personal background and experience. If you want your name, address, other contact details, or job title to remain confidential, please provide them in your cover sheet only so that we don't have to edit your response.

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Conserving geographic numbers

To (Ofcom contact): Elizabeth Greenberg

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing

Name/contact details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts?

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and I authorise Ofcom to make use of the information in this response to meet its legal requirements. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

Annex 4

Consultation questions

Question 1) Do you agree with Ofcom's proposal for the 27 geographic area codes listed in Figure 2 to be determined as Type A Conservation Areas? Are there any codes which you think a) should not have been included in the proposal; and/or b) have been omitted? If so, please state which codes and for what reasons.

Question 2) Do you have any specific comments on the proposed modifications to the Plan?

Annex 5

Notification of proposals for a modification to provisions of the Plan under section 60(3) of the Act

1. Ofcom, in accordance with section 60 of the Act, hereby makes the following proposal for a modification to the provisions of the Plan.
2. The Condition has effect by reference to provisions of the Plan.
3. The draft modification to the Plan is set out in the Schedule to this Notification.
4. The reasons for making the proposal and the effect of the modification are set out in the accompanying consultation document.
5. Ofcom considers that the proposed modification complies with the requirements in section 60(2) of the Act.
6. In making the proposals referred to above Ofcom have considered and acted in accordance with the six Community requirements in section 4 of the Act as well as performed their general duties under section 3 of the Act and their duty as to telephone numbering in section 63 of the Act.
7. Representations may be made to Ofcom about the proposal by 5pm on 26 June 2006.
8. Copies of this Notification have been made available to the Secretary of State.
9. In this Notification-
 - 'Act' means the Communications Act 2003;
 - 'Condition' means General Condition 17 of the General Conditions of Entitlement set by the Director by way of publication of a Notification on 22 July 2003;
 - 'Director' means the Director-General of Telecommunications as appointed under section 1 of the Telecommunications Act 1984;
 - 'Ofcom' means the Office of Communications; and
 - 'Plan' means the National Telephone Numbering Plan published from time to time by Ofcom.

Signed by Dr Stephen Unger

Director of Telecoms Technology

A person authorised by Ofcom under paragraph 18 of the Schedule to the Office of Communications Act 2003

25 May 2006

Schedule

The following shall be deleted from Appendix A of the Plan –

Geographic Area Code	Geographic Area	Conservation Status
1206	Colchester	
1225	Bath	
1226	Barnsley	B
1234	Bedford	
1244	Chester	B
1245	Chelmsford	
1253	Blackpool	
1256	Basingstoke	
1268	Basildon	
1276	Camberley	B
1293	Crawley	
1302	Doncaster	B
1384	Dudley	
1392	Exeter	
1482	Hull	
1484	Huddersfield	
1494	High Wycombe	B
1633	Newport	
1702	Southend-on-Sea	
1706	Rochdale	
1707	Welwyn Garden City	
1708	Romford	
1709	Rotherham	
1827	Tamworth	
1905	Worcester	
1932	Weybridge	
1952	Telford	

and replaced with the following –

Geographic Area Code	Geographic Area	Conservation Status
1206	Colchester	A
1225	Bath	A
1226	Barnsley	A
1234	Bedford	A
1244	Chester	A
1245	Chelmsford	A
1253	Blackpool	A
1256	Basingstoke	A
1268	Basildon	A
1276	Camberley	A
1293	Crawley	A
1302	Doncaster	A
1384	Dudley	A
1392	Exeter	A

Conserving geographic numbers

1482	Hull	A
1484	Huddersfield	A
1494	High Wycombe	A
1633	Newport	A
1702	Southend-on-Sea	A
1706	Rochdale	A
1707	Welwyn Garden City	A
1708	Romford	A
1709	Rotherham	A
1827	Tamworth	A
1905	Worcester	A
1932	Weybridge	A
1952	Telford	A