



National Single Non- Emergency Number

Proposals for number and tariff

Consultation

Publication date: 27 October 2005

Closing Date for Responses: 22 December 2005

Contents

Section		Page
1	Summary	3
2	Introduction and background	5
3	The Single Non-Emergency Number service	7
4	The Number	10
5	The Tariff	15
6	Evaluating the proposals for the number	21
Annex		Page
1	Responding to this consultation	27
2	Ofcom's consultation principles	30
3	Consultation response cover sheet	31
4	Consultation questions	33
5	Home Office paper on the introduction of a Single Non-Emergency Number	34
6	Non-Emergency Number - Research report, August 2005	39
7	Notification of proposals for a modification to the Numbering Condition	53
8	Glossary of terms	55

Section 1

Summary

- 1.1 The Office of Communications (“Ofcom”) is undertaking this consultation in order to meet a request from the Home Office. The Home Office, in partnership with the Office of the Deputy Prime Minister, plans to establish a nationwide service using a single, memorable number for the public to report or enquire about non-emergency issues relating to police, crime and anti-social behaviour. The service, referred to as the “Single Non-Emergency Number” or “SNEN”, will be rolled out in a staged process, achieving national coverage by 2008. The underlying policy behind the service has been consulted on and decided by the Home Office as part of its wider police reform proposals and it is not within the scope of this consultation to consider issues other than communications matters within Ofcom’s remit.
- 1.2 Ofcom is the National Regulatory Authority responsible for communications matters in the UK, including the administration of the UK’s numbering resource. Ofcom has been asked by the Home Office to make a 3-digit telephone available for the delivery of its proposed SNEN service. In order to make a 3-digit number available for use by all communications providers in accordance with a designated service, the number would need to be added to the list of such numbers in General Condition 17 of the General Conditions of Entitlement, which covers the allocation, adoption and use of telephone numbers (“the Numbering Condition”).
- 1.3 The Home Office has selected its preferred choice of number for the service. It wants the most memorable number available so that the number and the SNEN service can become as much a part of the public consciousness as the “999” number is for calling the emergency organisations. Ofcom advised the Home Office on available options, including full or reduced digit length numbers from existing ranges in the National Telephone Numbering Plan. The Home Office considered these options and decided that a 3-digit number (similar to the “999” and “112” numbers used for calling the emergency organisations) would be the most suitable choice. It concluded that, of the possible 3-digit number options available, “101” was the best choice, being memorable, having a low risk of misdials and easy to navigate for the blind and partially-sighted. A paper written by the Home Office in support of its choice of number is provided at Annex 5 to this document. In addition, Ofcom’s consumer research found that members of the public see “101” as a highly memorable number for the SNEN. A report containing the findings of Ofcom’s consumer research on number and tariff proposals for the SNEN is published at Annex 6 of this document.
- 1.4 While the Home Office is committed to the provision of the non-emergency service on a 3-digit number, other options may be available. The purpose of this document, therefore, is to seek stakeholders’ views on the Home Office’s preferred and alternative options and to set out the reasons for the Home Office’s proposal to make the 3-digit number “101” available for the SNEN service.
- 1.5 As with the number, the choice of options on the call charge for the SNEN rest with the Home Office and not Ofcom. The 3-digit number would have no inherent tariff structure. Therefore, the Home Office has drawn up potential

tariff options and Ofcom has set out these options on the Home Office's behalf. However, the Home Office plans to implement the tariff through negotiation with the selected SNEN service provider and communications providers. Accordingly, Ofcom will not be intervening in the setting of the tariff and this consultation does not propose regulatory measures on the matter of call charges. The tariff options are presented for stakeholder consideration and comment. Once stakeholders' views on those options are clear, Ofcom will assess the need to consider further issues of access to the SNEN and interconnection arrangements. If, at a future time, it is necessary for Ofcom to consider regulatory measures on the tariff, a further consultation on the specific issues and proposals would need to be carried out.

- 1.6 The main body of this document sets out background on the SNEN service and a discussion on the options for the number and tariff. There is also an evaluation of the options for the number in the form of a formal impact assessment. In line with the proposal on the number, this consultation contains a draft notification of the necessary modification to the Numbering Condition in order to implement the Home Office's proposal as outlined above. Comments are invited on the draft notification in Annex 7, the specific consultation questions contained in the document and listed in Annex 4 and general comments on the document by 22 December 2005.

Section 2

Introduction and background

Introduction

- 2.1 It is Ofcom's responsibility to administer the UK's telephone numbering resource. As part of this function, Ofcom sets aside specific telephone numbers for use or adoption by any communications provider in accordance with their service designation and without further application to Ofcom. Such numbers are listed in the Annex to the Numbering Condition. These numbers, which include, for example, "100" for access to operator assistance and "112" for access to emergency services, are different from the numbers Ofcom allocates uniquely to communications providers in accordance with the National Telephone Numbering Plan ("the Plan").
- 2.2 In administering telephone numbers, it is Ofcom's duty to ensure that the best use is made of the UK's numbering resource. To perform this duty, it is sometimes appropriate for new and/or additional numbers to be made available for use by communications providers. In order to do this, a modification to the Annex to the Numbering Condition or the Plan may be required. The Communications Act 2003 ("the Act") provides for modifications in accordance with set procedures, including consultation.
- 2.3 Also relevant to this consultation is recital 36 to the Universal Services Directive, which corresponds with article 26 of the same directive, and relates to emergency call numbers. It states that Member States should make the necessary organisational arrangements best suited to the national organisation of the emergency systems in order to ensure that calls are adequately handled and answered.
- 2.4 On the basis of the reasoning set out in Section 4 of this consultation, the Home Office has made a request to Ofcom for a 3-digit number to provide a nationwide single point of contact for the reporting of non-emergency issues relating to police, crime and anti-social behaviour. In order to meet this request, Ofcom must consult on adding the number to the Annex in the Numbering Condition and explain how the proposal would make the best use of the UK's numbering resource. The non-emergency service is intended to improve the call handling and actioning of reported incidents and enquiries. It would also alleviate the pressure on the emergency services caused by the volume of non-emergency calls currently made to "999/112" in the absence of members of the public knowing a more appropriate number to call. Therefore, the proposal is to make organisational arrangements to assist with the handling of emergency calls.

Scope of the consultation

- 2.5 The purpose of this consultation is to set out proposals to make a 3-digit number – specifically "101" - available for use by communications providers to provide access through a single and memorable telephone number to a co-ordinated means of enquiring about or reporting non-emergency issues. Section 3 of this document provides background information on the SNEN service. This service is a Home Office initiative on which the Home Office has already consulted, found stakeholder support and committed to provide

nationwide by 2008. Consequently, it is not the purpose of this consultation to examine the underlying policy and proposals for the SNEN service.

Ofcom's role

- 2.6 It is Ofcom's role, in terms of the SNEN, to consult on the communications issues required for the delivery of the service. Primarily, this is making the number available for use by communications providers in order for their customers to access the SNEN and this is the main focus of this consultation. There are also additional communications issues which need to be considered in order to deliver the service and these include the tariff, interconnection arrangements and issues of access from communications providers to the SNEN service. A discussion on the tariff for calling the SNEN is included in this document. Ofcom will assess the need to consider the issues of access and interconnection further once stakeholders' views on the number and tariff proposals are known through the responses to this consultation.

The legal framework

- 2.7 Ofcom regulates the communications sector under the framework established by the Act. The Act provides for the setting of Numbering Conditions and procedures for making modifications to these conditions. These procedures include the requirement to ensure that proposals are consistent with Ofcom's general duties as set out in section 3 of the Act and its Community obligations as set out in section 4 of the Act.

The legal framework in the context of this consultation

- 2.8 Ofcom is consulting on the proposal to designate the number "101" for "Access to Non-Emergency Services" in accordance with the Home Office's request. The Annex to the Numbering Condition needs to be modified so that the number "101" and its service designation can be added to the list of telephone numbers for use or adoption by communications providers in accordance with their designation (as provided by Numbering Condition 17.3). Section 45 of the Act gives Ofcom the power to set and modify conditions in accordance with the tests and procedures set out in sections 47 and 48 of the Act. The tests are that the modification is objectively justifiable; does not discriminate unduly; is proportionate and transparent. The procedures include the publication of a notification setting out the intention to modify the condition, together with the reasoning in proposing the modification and its effects. Comments on the proposals must be taken into account when Ofcom makes any modifications to the Numbering Condition.
- 2.9 This consultation document fulfils Ofcom's duties in proposing a modification to the Numbering Condition by containing the notification in Annex 7 and by providing the reasoning behind the proposals in the main body of this document. The various legal tests and duties, and how Ofcom has complied with them in consulting on its proposals, are set out in Section 6 of this document.

Section 3

The Single Non-Emergency Number Service

Background

- 3.1 The Home Office has been exploring the creation of a single number and contact point for reporting non-emergency issues since 2001, when the concept was introduced in the police reform white paper *Policing a New Century: A Blueprint for Reform*¹. This was originally conceived as a means of reducing the high level of non-emergency calls to the emergency service numbers “999/112” and to tackle poor call handling of reported non-emergency incidents. These factors had a detrimental impact on the emergency services and police response to genuine emergency incidents and, as a result, the initial review was largely a police-led initiative driven by the Police Information Technology Organisation (PITO). An initial study report by Mason Communications Limited found that a single non-emergency telephone number for contact with the police throughout the UK was feasible.
- 3.2 The Home Office then examined the potential for a wider remit for the SNEN service. In March 2004, PITO reviewed the options for a SNEN and looked at the possibility of extending its scope to combine non-emergency police calls and local authority “quality of life” issues. The report concluded that there was potential to expand the scope of the SNEN to allow access to a wide range of public services. It recommended that an overall framework be set but that the way various stakeholders implemented the SNEN service should be flexible to meet the needs of local communities.
- 3.3 Responses to a public consultation carried out for the Home Office report *Policing: Building Safer Communities Together*² revealed strong support for the idea of a single telephone number to cover police and local authority issues. Further to this research, a study conducted for the Home Office by MORI in October 2004 titled *Perceptions of the Need for a Non-Emergency Helpline*, concluded that citizens who had experienced problems caused by anti-social behaviour were particularly in favour of a national single non-emergency number to provide a clear means of contacting the appropriate authorities.

The Home Office’s commitment to the SNEN service

- 3.4 *The Home Office Strategic Plan 2004-2008*³ included an undertaking to introduce a 3-digit non-emergency number to access the police and other local services. The Government’s desire to see the development and implementation of the SNEN service continued with the “Coppers’ Charter”, which committed the police to provide a more consumer focused service. The SNEN forms a key part of such a service. The police reform white paper

1 <http://www.archive.official-documents.co.uk/document/cm53/5326/cm5326.htm>

2 <http://www.policereform.gov.uk/docs/buildingsafercommconsult.pdf>

3 <http://www.homeoffice.gov.uk/documents/strategicplan.pdf>

*Building Communities, Beating Crime*⁴, November 2004, confirmed the Home Office's decision to provide the SNEN service.

Reason for the introduction of the SNEN and benefits to consumers and other stakeholders

- 3.5 The aim of the SNEN service, as described in the Home Office's paper *Building Communities, Beating Crime*, is to give the public a single point of access to report and/or get advice in relation to non-emergency issues of policing, crime and anti-social behaviour. This is intended to provide a more responsive service to the public, and to alleviate the demands on the emergency organisations and related public services. The public are currently faced with a range of numbers in order to access local authority services and police stations. The quantity and general lack of memorability of the numbers results in consumers frequently calling "999/112" in the absence of knowing a more appropriate number.
- 3.6 BT reports that of the 30.5 million calls currently made on average to the "999/112" service, 50% are filtered out and 15 million are passed on to emergency services. Of these 15 million calls, 58% are transferred to the police (8.7 million calls), 34% to ambulance services, 7% connected to the Fire Service and less than 1% to the Coastguard. One of the aims of the programme is to reduce inappropriate calls to "999/112" and to the police in particular. It is estimated that 70% of emergency calls transferred to the police do not require an immediate response.

Scope of issues covered by the SNEN service

- 3.7 The Home Office's paper *Building Communities, Beating Crime* specifies three key areas to be included within the SNEN service. These are non-emergency issues relating to:
- policing;
 - crime; and
 - anti-social behaviour.
- It also mentions "quality of life" issues.
- 3.8 Within these broad areas, the core SNEN service will focus initially on the priority issues identified by i) the public consultation undertaken by MORI, and ii) the collaboration of police force and local authority partnerships which will deliver the first wave of the service. These priority issues are:
- youth related nuisance;
 - vandalism and graffiti;
 - noisy neighbours;
 - alcohol related anti-social behaviour;

⁴ <http://www.policereform.gov.uk/docs/prwp2004.html>

National Single Non-Emergency Number

- drug related nuisance;
- abandoned vehicles;
- litter; and
- street lighting.

Timetable for SNEN implementation

- 3.9 The Home Office has committed to putting the core system for the SNEN in place by the end of 2006. Initially the service will be able to i) resolve some issues over the telephone; ii) provide advice on certain matters; and, where that cannot be done, iii) forward calls to the appropriate contact. The intention is to have a full national system in operation by 2008, preferably with an intelligent front end for improved call handling.
- 3.10 The Home Office is planning to introduce the SNEN service through three waves of service launch. The first wave, planned for mid-2006, will involve partnerships between police forces and local authorities in seven areas and will be used to define and develop the core service focussing on the key issues of non-emergency policing and antisocial behaviour set out in paragraph 3.8 above. The findings of the first wave will inform the development of the SNEN service for the second wave (planned for mid-2007) and full nationwide rollout (planned for 2008). During the first and second waves, access to the SNEN would be restricted to the participating geographic areas. Calls made to the SNEN from non-participating areas would be given alternative telephone numbers to call.

International comparison

- 3.11 The United States provides a useful comparison for the UK's planned SNEN. A number of States have introduced the number "311" to provide a non-emergency contact point in parallel to the "911" emergency number. The introduction of the "311" service has been viewed as a success in the United States. One of the areas that has implemented the non-emergency service, Baltimore, found that calls to "911" were reduced and that savings resulted from reduced calls and duplication of responses. Prior to opening Baltimore's non-emergency contact centre, there was an average of 17,000 calls a day (6 million calls a year) made to "911" out of a total population of 630,000 people. Now that consumer confusion regarding numbers and services has been averted by making the "311" number available and widely known, the number of calls to "911" has reduced to 3,000 calls a day (1 million per year).
- 3.12 A number of European countries have launched or are considering the launch of similar non-emergency services. Sweden, for example, has introduced the number "11414" as a single point of access to report non-urgent police issues. A reduction in call traffic to the emergency service number has been experienced. France has a helpline number "3939" for information on government services.

Section 4

The Number

Introduction

- 4.1 On the basis of the reasoning set out in this section, the Home Office has made a request to Ofcom for a 3-digit telephone number for the delivery of its non-emergency service initiative, which is being undertaken in partnership with the Office of the Deputy Prime Minister. It wants the non-emergency service and number to become as much a part of the public's consciousness as the emergency service and "999" number. It is important, therefore, that the number is memorable and can be used as a strong brand for the non-emergency service.

Available choices of number

- 4.2 While the Home Office is committed to the provision of the non-emergency service on a 3-digit number, other number options are available. These include a number from a range already designated in the Plan and a short digit version of a number from the Plan. There is also a future option to use a number from the "116" Harmonised European Short Code range, which is currently under consideration by the European Commission and by European numbering working groups. These four high-level options are further explained in this section and assessed in a formal impact assessment in Section 6.

3-digit number

- 4.3 The Annex to the Numbering Condition contains, among other types of numbers, a list of telephone numbers available for use or adoption in accordance with their specific service designation. Such numbers are known as Type A Access Codes. Type A Access Codes are used by consumers to reach commonly used services such as "100" for "Access to Operator Assistance"; "112" for "Access to Emergency Services"; and "123" for "Access to the Speaking Clock". These codes may be used throughout the UK by all communications providers offering equivalent services but may not be used for any other service.
- 4.4 Access Codes can only begin with the digit "1". This is because the digit "0" signifies national or international dialling and the digits "2" to "9" are used for local dialling of geographic subscriber numbers within the same geographic area code. Within the digit "1" numbering space, codes have already been divided into categories of Type A, Type B (to provide indirect access and directory enquiry services) and Type C (to allow independent use by communications providers either to provide services exclusively to their directly connected subscribers or for internal network operator services dependent on the provider). Given these categories of access code, it is clear that Type A codes are the appropriate type for the SNEN service.

National Single Non-Emergency Number

- 4.5 Type A Access Codes available for service designation are codes beginning with the digits “10X” and “11X”. Some of these codes have already been designated for services, such as “100” and “112”. Codes still available for service designation are:

101	102	103	104	105	106	107	108
109	110	111	113	114	115	117	119

- 4.6 In order to designate a Type A Access Code with a service, Ofcom is required to consult on adding it to the list of such numbers in the Annex to the Numbering Condition.

Eligibility criteria for a 3-digit number

- 4.7 3-digit numbers are a scarce resource. As set out in paragraph 4.5 above, there are only 16 Type A Access Codes available for designation. Ofcom is clearly limited in the amount of 3-digit numbers that it can designate (subject to consultation) for specific services. 3-digit numbers are also a valuable resource. Clearly the fewer digits requiring recollection, the easier the number is to recall, making the numbers highly desirable. However, this partly depends on the quantity in use, as 3-digit numbers are memorable not only because of the reduced number of digits but also because of their rarity.
- 4.8 In the absence of set criteria for eligibility, Ofcom needs to consider carefully any request for the designation of a 3-digit code on its individual merits. In addition to protecting the very benefit that 3-digit numbers provide (i.e. their relative uniqueness and memorability) there is also a restriction in availability imposed by the lack of possible 3-digit numbers. Ofcom considers that the SNEN service would be of significant public benefit and that the Home Office’s request for a 3-digit code for the service represents a justified use of one of the available 3-digit Type A Access Codes.

Question 1: Do you agree with Ofcom’s view that the Single Non-Emergency Number service represents a justified use of a 3-digit number?

Question 2: What characteristics do you think a service should have to be eligible to apply to Ofcom for the designation of a 3-digit number?

Numbers from ranges designated in the Plan

- 4.9 The Plan lists public telephone network numbers available for allocation uniquely to communications providers. 3-digit telephone numbers are not allocated to individual communications providers and therefore are not listed in the Plan. If, rather than using a 3-digit number, a number from a range designated in the Plan was to be used as the SNEN, it would need to be allocated direct to a particular communications provider who would then sub-allocate the number to the SNEN service provider (if a different entity).
- 4.10 There are number ranges designated in the Plan that could be suitable for the SNEN service. For instance, non-geographic numbers such as 080 “Special services no charge”, 0844 “Special services basic rate” and 0871 “Special services higher rate” are possible options. These are number ranges whose arrangements, including tariff, are established and of which consumers are already aware. In addition, no action from Ofcom would be required to provide

a number from a designated range for the SNEN service. However, the disadvantage of choosing one of these numbers for the SNEN is that the individual choice of number would be limited by availability and it is likely that the most memorable numbers are already in use.

Short digit version of numbers from ranges designated in the Plan

- 4.11 Number ranges designated in the Plan are, in most instances, 11-digits long, including the leading digit "0". Two exceptional consumer-facing services have been allocated short digit versions of numbers from the Plan with the aim of increasing their memorability. These numbers and services are 0800 1111 for "Childline" and 0845 4647 for "NHS Direct". The likely popularity and consumer-facing nature of the SNEN service would make it eligible for a short-digit number.
- 4.12 Ofcom would need to intervene to designate a number block as a short digit number. Choice of number block is limited to those currently unallocated to communications providers and, as with the full number length option, memorable choices may not be available. In addition, the routing of calls to a short digit number has complications for the communications industry. Ofcom considers that this would not result in the optimal use of the numbering resource (as the remaining numbers in the block would not be available for use).

Harmonised European Short Codes

- 4.13 Harmonised European Short Codes (HESC) is a concept currently being considered within Europe to harmonise the use of short numbers starting with the digits "116" for services which are similar in participating European countries. The Communications Committee, which assists the European Commission in carrying out its executive powers, has recently consulted on the reservation of the "116" code in all Member States' numbering plans to allow for harmonised numbers for harmonised European services. Also, the Electronic Communications Committee (ECC) within the European Conference of Postal and Telecommunications Administrations (CEPT) has consulted recently on the HESC concept and high level principles, such as the type of services to be eligible to apply for a HESC. It was evident from the responses to the ECC consultation that non-emergency police assistance was a service concept being investigated by a number of European countries and one that could potentially be harmonised in European countries on a 116 number.
- 4.14 However, the proposal for HESC is still at a relatively early state and there are many issues relating to the HESC concept that are yet to be determined. In particular, decisions on how numbers are to be assigned to services has yet to be decided. It is likely that calls to HESCs will be free to caller. This may not meet the Home Office's requirements. The Communications Committee is currently proposing that, through liaison with the ECC, an initial list of 116 numbers and services should be identified by the end of 2006. However, it is not certain that this list would include non-emergency services and it appears unlikely that a decision on the HESC would be made in time to meet the launch timescales for the Home Office's SNEN service.

Home Office preferred choice of number

- 4.15 As stated, the SNEN service is a Home Office initiative (working in joint partnership with the Office of the Deputy Prime Minister) and the choice of preferred number rests with the Home Office. Ofcom's role has been to provide advice and consult on available options. The Home Office wants to ensure that the SNEN service has the best support, which includes the best available number in terms of memorability, consumer perception and reduced risk of misdialling. On Ofcom's advice, the Home Office has considered the possible number options above and concluded that the most suitable choice would be a 3-digit number.

Choice of appropriate 3-digit number

- 4.16 The possible 3-digit numbers available for designation for the SNEN service are listed in paragraph 4.5 above. Useful criteria for evaluating which number would be the most suitable for the SNEN service are memorability; reduced risk of mis-dials; and ease of keyboard navigation.
- 4.17 A number's digit pattern helps determine whether it is the best choice to meet these criteria. Repetition of digits can help make a number memorable but can also increase the chance of misdialling as confusion over the number of times a digit has been dialled can occur. Ergonomic advisers have indicated that to avoid misdials, the same digit should not be repeated consecutively. This would suggest that the "11X" numbers should be avoided. On the other hand, repetition of non-consecutive numbers could aid memorability as the digits form a pattern. This would suggest that the number "101" would be memorable.
- 4.18 Discussions with stakeholders, particularly the Royal National Institute of the Blind, suggest that an "up-down-up" dialling movement across the keypad can aid navigation and avoid misdialled calls. This is particularly relevant for blind and partially sighted consumers who can benefit from a movement across the raised pip on the number 5 key. The number "101" is appropriate in this respect as it would require a dialling movement across the keypad and the number 5 key.
- 4.19 Ofcom tested the suitability of "101" as the single non-emergency number by conducting consumer research (see Annex 6). The research found that consumers clearly believed that the number "101" was memorable and for this reason nearly seven out of ten respondents preferred it to the alternative choices offered of "105" and "109". Consumers were also asked whether they thought the number "101" had negative connotations and might not be appropriate for the non-emergency service. Almost 6 in 10 disagreed, meaning that the majority of respondents found the number appropriate for the service.

*Question 3: Do you agree with the Home Office's view that
a) a 3-digit number is the best choice for the non-emergency service; and
b) of the 3-digit numbers available, "101" is the best option?
Please give reasons for your views.*

Assessment of options

- 4.20 Ofcom is consulting on the proposed notification of modification to the Numbering Condition on the basis of the Home Office's preference for a 3-digit number, specifically "101".
- 4.21 Stakeholders are invited to comment on the Home Office's preferred choice of number for the SNEN service as well as the other available number options that have been discussed above. Section 6 of this document contains an impact assessment of the possible options for the number for the SNEN service.

Section 5

The Tariff

Introduction

- 5.1 Ofcom's principle duty, in carrying out its functions, is to further the interests of citizens and consumers in relation to communications matters. This duty includes, as set out in Article 8.4(d) of the Framework Directive, promotion of the provision of clear information, in particular requiring transparency of tariffs and conditions for using communications services. As already stated, the Home Office's preference for the SNEN is for a 3-digit Access Code number and in particular for the number "101". However, Access Codes give no information on tariff and/or service in their digit structure. It is, therefore, important that consumers gain information from other sources on the charges (if any) of calling the SNEN. Accordingly, the Home Office is planning an extensive publicity campaign, which will include, amongst other things, generating awareness of any charges proposed.
- 5.2 Ofcom has not been asked to consider regulatory intervention in relation to the tariff at this time and is not, therefore, formally consulting on the tariff options. Instead, the Home Office plans to negotiate with communications providers on the tariff for calling the SNEN service.
- 5.3 To supplement its discussions with providers, the Home Office has asked Ofcom to seek stakeholders' views on appropriate call charges as part of this consultation. Therefore, the tariff options in this section of the document are set out on behalf of the Home Office. Ofcom has provided advice on the options available and the Home Office has selected four tariff options for focussed consideration. It has also identified its preferred option, which is 10 pence-per-call for service implementation, with the intention to move to free-to-caller over time (depending on call volume and costs of handling).

Influential factors in establishing appropriate call charges

- 5.4 A number of considerations need to be taken into account when determining the appropriate charge to call the SNEN to report non-emergency issues. These elements include:
- the cost of providing the call handling element;
 - who will fund the call handling costs of the SNEN and what is the available budget;
 - the estimated call volumes and length of call;
 - how best to provide tariff transparency; and
 - the best way of achieving the policy aims of the SNEN.
- 5.5 These elements are discussed in the following paragraphs.

Cost of handling calls to the SNEN

- 5.6 The Home Office plans to invite tenders for the provision of the call handling element of the service in the coming months. Until the service provider has

been selected and work on establishing the cost of provision has been progressed, it is not possible to accurately calculate the cost of providing the communications element of the SNEN service. A useful comparison, in the absence of any firm information, is the provision of the call handling element of the “999/112” emergency service. BT, one of three call handling service providers for calls to “999/112” (the others being Cable & Wireless and Kingston Communications), has stated that calls to the emergency numbers cost an average of 60 pence-per-call to handle. The Home Office considers that the cost of handling calls to the SNEN service is likely to vary depending on the call routing method. If the location of the calling party can be ascertained automatically then the call can be routed to the appropriate local police or authority. However, if the location can not be automatically established, a switchboard response will be required increasing the cost of call handling. The actual costs and differentials have yet to be determined.

Funding of the SNEN service and call charges

- 5.7 Details of the budget and funding for the service are in the process of being agreed by the Home Office. However, it is clear that the cost of providing the SNEN will be substantial. The Home Office’s initial assumption is that callers should make a contribution to the cost of the telecommunications elements of calling the SNEN. It proposes that, at least initially, the SNEN should impose a charge of 10 pence-per-call, regardless of call duration. The first wave will be used to assess call volumes and cost of call handling. It will also help assess whether it is viable for calls to the SNEN to be free in the future.

Estimated call volume and length of call

- 5.8 It is likely that in addition to the average 7.5 million calls made to “999/112” reporting non-emergency incidents per year, publicity of the SNEN service will result in a growth in awareness and citizen activity in reporting non-emergency issues which may generate millions of additional calls per year. The Home Office estimates that the average length of call made to the SNEN will be five minutes, including transfer to police and/or local authorities if appropriate. This estimate is taken from the average length of calls to comparable consumer-facing services such as the Department of Trade and Industry’s “Consumer Direct” service. As mentioned above, the first wave of the SNEN service will help predict the likely call volumes and length of call when the service is launched nationwide.

Tariff transparency

- 5.9 Tariff transparency is an important component in ensuring that consumers are adequately protected and can make informed choices. An overriding point, which applies to all the tariff options, is that despite the service providers’ intended charge for calling their service, the retail charge to consumers may vary between networks. In the absence of a communications provider having Significant Market Power (“SMP”) in a particular defined market, Ofcom does not usually set retail prices (although this may be possible in certain circumstances). The result is that pricing designations specified by Ofcom in the Plan would relate only to customers of BT and Kingston Communications. The tariff charged by other networks would be a commercial decision for each communications provider and may vary. Further, if Ofcom does not intervene in specifying a pricing designation for the SNEN service, the cost for calling from all providers, including BT and Kingston Communications, would be a

National Single Non-Emergency Number

commercial decision and again may vary between networks. As the Home Office has not asked Ofcom to consider intervention on the issue of tariff, it is therefore essential that tariff transparency is provided through publicity and other relevant means.

Policy aims of the SNEN with respect to tariff arrangements

- 5.10 The Home Office's SNEN initiative is not specifically designed to reduce the cost of reporting non-emergency issues. The appropriate way of reporting such incidents currently is to call the local police station or local authorities. The means of doing so is increasingly on an assortment of 0845 Number Translation Service ("NTS") telephone numbers. This means that not only do callers need to know and call a wide range of telephone numbers to report various incidents, but that call charges are generally higher than for normal geographic calls. For further details on Ofcom's views on public sector use of NTS numbers, see paragraphs 5.11 to 5.13 below.

Ofcom tariff guidance and Central Office of Information's best practice guidelines

- 5.11 The cost to consumers for making telephone calls to public sector services is an important and sensitive issue and one that was of concern to respondents to a recent Ofcom consultation on NTS *Number Translation Services: Options for the Future*⁵. Consumers expressed concerns about the use of NTS numbers for public services, since call charges are generally higher than those for calls to ordinary geographic numbers and because the organisation using the number might receive a share of the call charge.
- 5.12 Ofcom is considering the cost of calling public services in its further consultation on NTS *Number Translation Services: A way forward*⁶ published on 28 September 2005 (consultation closes on 6 December 2005). Ofcom's position is that it is inappropriate for public bodies to require vulnerable or low-income consumers to rely on chargeable NTS numbers exclusively (i.e. without, at a minimum, giving equal prominence to a geographic number alternative) for access to essential services. This is because the price of chargeable NTS calls is generally higher than calls to geographic numbers. However, Ofcom considers that the choice of number and hence call tariff is a matter for the organisations concerned. Ofcom also considers that restricting the availability of NTS numbers for public sector services would be potentially discriminatory and considered that there was insufficient evidence of consumer detriment in relation to the use of NTS numbers in the 08 range to justify such an extreme position.
- 5.13 The Central Office of Information (COI) provides advice and support to public sector organisations on all aspects of communications. Amongst other things,

⁵ A summary of responses to this consultation is available in Ofcom's second consultation on NTS entitled *Number Translation Services: A Way Forward*. This document is available on Ofcom's website at the following address:

http://www.ofcom.org.uk/consult/condocs/nts_forward/

⁶ http://www.ofcom.org.uk/consult/condocs/nts_forward/#content

it publishes *Better practice guidance for Government contact centres*⁷. A section of this guidance deals with the selection of telephone numbers and the cost of calling Government services. Ofcom contributed to a recent revision of this guidance as part of its review of the regulatory arrangements for NTS. The guidance states that the use of chargeable 08 numbers for consumer-facing services – particularly those used by vulnerable groups and those on low incomes – should be approached with caution. The guidance goes on to state that “free services would be appropriate if you are targeting those who may be deterred by the cost of a call (for example, the elderly, young people or those on low incomes or where the nature of the call is confidential) and is particularly applicable if your objective is to encourage as many people as possible to call.”

Consumer research on intentions to use the non-emergency number

- 5.14 Ofcom commissioned consumer research in order to gain visibility of consumer attitudes towards possible tariff options for calling the SNEN service. A report on the research findings is included at Annex 6 of this document. As part of the research, a number of tariff options were suggested, which covered geographic number call rates; up to 5 pence-per-minute from a landline only or including mobile and pay-phones; and up to 10 pence-per-minute. The majority of respondents claimed that if they wanted to report a non-emergency incident, they would call the non-emergency number at any of the price options listed. The option of 5 pence-per-minute for all callers was the most popular, with 78% of respondents claiming that they would probably or definitely call at that tariff. However, 11% of respondents claimed that they would not call the SNEN to report a non-emergency incident at any of the tariffs listed, and of those 11% of respondents, 66% cited the reason not to call was the price.

Tariff options

- 5.15 As stated, Access Codes have no inherent tariff structure or interconnection arrangements. There are, therefore, a wide range of possible tariff options for the SNEN which could offer various advantages and disadvantages for consumers, communications providers, and the parties funding and providing the SNEN. This range of options is set out below, including indicative commentary on their possible impact:
- Freephone: calls would be free from fixed lines but may be chargeable from mobile phones and payphones. This option has the benefit for consumers of tariff transparency and reduced expense (although not to the extent of the “free to caller” option – see below). It also has the benefit for emergency services by reducing the likelihood of inappropriate calls to “999/112” as calls to the non-emergency service would also be free. On the other hand, this may increase the risk of hoax/nuisance calls. The service provider would need to fund the cost of receiving calls.
 - Free to caller: all calls would be free, including calls made from mobiles and payphones. In addition to the comments on the “freephone” option, this

⁷ This document is available on the COI website at the following address:
www.coi.gov.uk/ccg/

National Single Non-Emergency Number

option would offer complete tariff transparency and would benefit all consumers including those whose only access to the SNEN would be via mobile or payphone. This option would be more expensive for the service provider to fund than the Freephone option;

- Special Service Basic Rate and Special Service Higher Rate as provided on 0845 and 0870 numbers (formerly known as Local Rate and National Rate): a non-geographic rate that may differ from the distance based local/national rate associated with making a local or national call to a geographic number. This option is not recommended by Ofcom for the SNEN. Ofcom is currently consulting on proposals to introduce interim pricing designations for the 0845 and 0870 ranges as part of a longer term plan that may result in further changes to the pricing designations. The interim arrangements (if implemented) would replace the current pricing designation for 0845 and 0870 numbers with a pence-per-minute ceiling (see paragraph 5.12);
 - Genuine Local Rate or Genuine National Rate: the cost of the call would be the same as the cost of making a local or national geographic call regardless of the network that the caller was using. This would not mean that all callers pay the same charge but simply that the call would cost the same as a local or national geographic call from the same communications provider. This option provides clear tariff transparency. Restoring the link between geographic and non-geographic tariffs is a concept explored in the current NTS consultation (see paragraph 5.12);
 - Fixed rate pence-per-minute: the tariff would be indicated by quoting a fixed pence-per-minute call cost;
 - Fixed pence-per-call / single drop charge: the tariff would be a set charge for the call regardless of call length;
 - Variable pence-per-minute according to day/time: this tariff arrangement allows for calls to be cheaper at non-peak times, i.e. evening and weekends;
 - Pence per minute with a maximum tariff ceiling: rather than set the pence-per-minute tariff for the call, a maximum tariff ceiling would be stated, for example, “up to and including 5 pence-per-minute”. Call costs could vary between networks up to and including the tariff ceiling rate; and
 - Pence per minute / maximum tariff ceiling, with maximum cost of call: similar to the pence-per-minute and pence-per-minute with a maximum tariff ceiling, but with the addition of a limit on total call cost.
- 5.16 The above provides a comprehensive list of tariff options. However, for the purposes of focussing stakeholders’ comments, the Home Office has selected its preferred options (see below). Stakeholders’ views on appropriate call costs, taking into account the factors discussed in paragraphs 5.4 to 5.10, are particularly sought on the options set out below.

Home Office preferred tariff options

5.17 The Home Office has considered the possible tariff arrangements and has selected the following options for specific consideration by stakeholders:

- **Option 1: free to caller including free from payphones and mobiles**
- **Option 2: 10 pence-per-call**
- **Option 3: 3 pence-per-minute**

- **Option 4: 10 pence-per-call initially, with the intention to moving to free to caller in the future**

5.18 The Home Office's preferred option is Option 4 – 10 pence-per-call initially, with the intention of moving to free to caller in the future if considered feasible once call volumes and handling costs are more transparent. Rather than request regulatory intervention in the pricing designation for the SNEN, the Home Office wants the tariff to be implemented, at least initially, following negotiation between the Home Office, the SNEN service provider and communications providers. If, at any stage, it becomes necessary to consider regulatory intervention on the tariff, Ofcom would need to consult specifically on that issue. Therefore, in this consultation, Ofcom is seeking stakeholder views on the tariff options but is not making a proposal on the appropriate tariff for the SNEN and therefore has not conducted an impact assessment on the tariff options.

Question 4: What are your views on the four tariff options chosen by the Home Office for specific consideration by respondents? In particular, what are your views on the Home Office's preferred tariff?

Section 6

Evaluating the proposals for the number

Introduction

6.1 In this document, Ofcom has considered the measures that it believes are required to deliver the Home Office's request for a memorable number for its national non-emergency service. The options for the number are assessed in this section of the document.

Impact Assessment

6.2 The analysis presented in this section, when read in conjunction with the rest of this document, represents an Impact Assessment (IA), as defined by section 7 of the Act. You should send comments on this IA to Ofcom by the closing date for this consultation, which is 22 December 2005. All comments will be considered by Ofcom when it decides whether to implement its proposals.

6.3 An IA provides a valuable way of assessing different options for regulation and showing why the preferred option was chosen. In accordance with section 7 of the Act, in producing the IA in this document Ofcom has had regard to such general guidance as it considers appropriate, including related Cabinet Office guidance.

Criteria for evaluating policy options

6.4 The main criteria for assessing the options has been developed from the relevant duties in the six European Community requirements for regulation as set out in section 4 of the Act; the relevant general duties of Ofcom as set out in section 3 of the Act; and the relevant general duties as to telephone numbering functions as set out in section 63 of the Act. These include the requirements to:

- further the interests of citizens and consumers in relation to communications matters;
- have regard to regulatory activities being transparent, accountable, proportionate, consistent and targeted only at cases in which action is required – representing best regulatory practice; and
- secure what appears to Ofcom to be the best use of telephone numbers and encourage efficiency and innovation for that purpose.

6.5 Ofcom has examined these requirements in the context of what is relevant to the aims of providing a memorable number for the SNEN service and considers that the criteria for evaluation of the alternative options may be summarised as:

- the promotion of consumer interests;
- best regulatory practice; and

- best use of telephone numbers.
- 6.6 Ofcom acknowledges that regulatory intervention has various implications, including costs and risks, which must be considered alongside the benefits. When evaluating the policy options, therefore, further criteria to be considered are the associated costs, benefits and risks.

Options for the number to be used for the SNEN service

- 6.7 As stated, the Home Office's preferred choice is for a 3-digit number, specifically "101". Ofcom has therefore included, as part of this consultation, a proposed notification of the necessary modification to the Annex of the Numbering Condition so that the number "101" may be made available for communications providers to provide access to the non-emergency service.
- 6.8 However, although the Home Office has selected its preferred option for the SNEN number, other options are available and are assessed below as part of the IA. Stakeholders may comment on any number option for the SNEN in their responses to this consultation.

Options for number

- **Option A: 3-digit number**
 - **Option B: 11-digit number from the Plan**
 - **Option C: Short digit version of number from the Plan**
 - **Option D: A short code starting with "116" in anticipation of a possible Harmonised European Short Code**
- 6.9 Further explanation of these options is provided in Section 4 of this document.

Evaluation of options

Promotion of consumer interests

- 6.10 Numbering arrangements can further the success of communications services, and thereby promote consumer interests. The policy aim of the SNEN is to improve citizens' experience of reporting or gaining advice in relation to non-emergency issues of policing, crime and anti-social behaviour by providing a single point of contact using a memorable telephone number. Therefore consumer interests would be promoted by the selection of the most memorable number, increasing the likelihood that when required, it can be recalled by consumers.
- 6.11 It is logical to assume that the fewer digits in a number, the easier it is for consumers to recall that number correctly when required. Option A, with three digits, is the shortest number. Option D would be between four and six digits in length (as yet to be determined), while Option C, given the precedent set by Childline and NHS Direct, would be seven digits in length. Although longer digit numbers could potentially be as memorable if the digit structure has a noteworthy pattern, it is unlikely that numbers with a particularly memorable pattern remain available to be used for the SNEN service.
- 6.12 Ofcom's consumer research (see Annex 6) found that, when posed with questions on the ease of remembering and suitability of a 3-digit number for

National Single Non-Emergency Number

the non-emergency service (“101” was used as the specific example) that 93% of respondents agreed or strongly agreed that “101” was easy to remember as it only had three digits. In addition, 86% of respondents agreed or strongly agreed that they would be likely to remember the 3-digit number when they needed to report a non-emergency incident. Further, 3 out of 4 respondents agreed that a 3-digit number seemed an important number like “999”.

Best regulatory practice

- 6.13 It is one of Ofcom’s duties to support the provision and widespread use of communications services, thus creating choices for consumers. By providing the most appropriate number for the Home Office’s SNEN initiative, Ofcom can help support the provision of a service which will promote consumers’ interests.
- 6.14 Options A, C and D would require Ofcom action to make the number available and administering the numbering resource in a manner that ensures that the best use is made of telephone numbers would come with Ofcom’s general duty to secure the best use of telephone numbers. Option D would require regulatory action contrary to the European recommendation to reserve the 116 range for future harmonisation of European codes and services, as the appropriate 116 code for non-emergency services (if there is to be one) is as yet unknown.
- 6.15 It can be concluded, therefore, that best regulatory practice in the provision of a suitable telephone number for the Home Office’s SNEN service is the option that will most effectively further consumer interests while also representing the best use of telephone numbers.

Best use of telephone numbers

- 6.16 It is Ofcom’s duty with regard to telephone numbering functions to secure what appears to be the best use of telephone numbers. This is particularly relevant where the type of numbering resource is scarce, as with 3-digit Access Codes. Therefore, under Option A, Ofcom must be satisfied that the SNEN service would make appropriate use of this limited resource. Ofcom’s analysis of this question, which is set out in paragraph 4.8, leads Ofcom to consider that this would be the case for the proposed SNEN service.
- 6.17 Option B would be a suitable use of telephone numbers provided that the characteristics of the number range meets those of the SNEN service. However, Ofcom considers that the use of chargeable NTS numbers by public bodies is inappropriate as the sole means of access to essential services. Option C would not represent optimal use of numbers, as the remaining numbers in that block would be unavailable for use. The extent to which Option D might represent the best use of the UK’s available numbering resource is difficult to assess at this stage, given that it is only a proposal.

Costs of the options

- 6.18 Consumers: Options A and D may represent costs to business consumers who would need to ensure that customer premises equipment was modified to allow calls to the new short numbers.

- 6.19 The cost to consumers to call Option A would depend on the associated tariff, which has yet to be decided, although the Home Office's preferred tariff is 10 pence-per-call moving to free to caller. The tariff for calling a number from Options B and C would depend on the number range selected. It is not known at this stage what, if any, tariff would be applied under European legislation to Option D.
- 6.20 Communications providers: Option B would represent no costs to communications providers beyond "business as usual" costs of data amendments and call routing. Option C would generate a cost in data amendments to ensure that a short digit version of a number from the Plan could be routed successfully. Options A and D would result in higher costs and inconvenience for communications providers who would need to set up charging and routing processes for a new number type and tariff. This would also include modifying payphones to accept the new code and charge accordingly.

Benefits of options

- 6.21 Consumers: Option A would be the most memorable number option and would therefore offer the most benefit to consumers. By being memorable, it would also help the service deliver its key policy aim of diverting non-emergency calls from "999/112". Options B and C would provide greater tariff transparency since consumers already associate the number ranges with call tariffs.
- 6.22 Option D could eventually provide the benefit of a harmonised number for non-emergency services across Europe but there are obvious uncertainties about how the HESC concept might develop. This option is, therefore, of limited benefit at this time. Ofcom anticipates, however, that if the concept is implemented at European level at a later date, the 116 number could be implemented in parallel with the chosen SNEN number in much the same way as "112" currently provides harmonised European access and "999" provides national access in the UK to the emergency organisations.
- 6.23 Communications providers: Option B would require no deviation from the way numbers from the Plan are currently routed and tariffed and may therefore be the most beneficial to communications providers.

Risks of options

- 6.24 Consumers: Option A has the risk that communications providers may not open access to the new code, particularly as tariff and interconnection arrangements have yet to be agreed. Consumers may therefore find that access provision is dependent on the network used to make the call and whether that network has chosen to provide access. Once stakeholders' views are clear following the conclusion of this consultation, Ofcom will assess the need to consider further issues of access to the SNEN and interconnection arrangements. Ofcom is also mindful of the need to ensure that tariff arrangements under Option A are transparent to consumers.
- 6.25 Option B has the risk that the number will not be memorable and would not provide any benefit over the multitude of full length telephone numbers that are currently available to contact local authorities and police stations. Option C has an increased likelihood of being recalled than Option B, but still may

National Single Non-Emergency Number

not be memorable as it may be difficult to incorporate as a “catchy” brand in publicity material. Option D has the risk of delaying implementation of the SNEN service until the assignment of a 116 for non-emergency services has been made (which may not happen).

- 6.26 Communications providers: the risk of Option A for communications providers is that modifications to payphones may be costly. Such modifications may also need to be conducted according to a rolling maintenance plan and may take some time to complete. Similar risks exist for Option D should the HESC concept be adopted. The risk of Option C is that network resource will be inefficiently employed to route the shorter digit number.

Outcome of evaluation of options

- 6.27 The evaluation of options demonstrates that Option A would best promote consumer interests and consequently would represent best regulatory practice and best use of telephone numbers. While Option A provides the most benefits for consumers, it also represents the highest costs for communications providers and has a number of risks attached. However, taking the whole analysis on balance, it is considered that the benefits of Option A in terms of meeting the established criteria outweigh the associated costs and risks.

Question 5: Do you have any comments on the evaluation of options and/or the outcome of the Impact Assessment?

Legal tests

- 6.28 As stated in paragraph 2.8, it is Ofcom’s duty, when proposing a modification to a General Condition of Entitlement, to show how it considers that its proposals comply with the legal tests in the Act. In this case, the proposed modification would be to designate the number “101” for “Access to Non-Emergency Services”. Ofcom is satisfied that the proposal for a modification to the provisions of the Numbering Condition meets the tests set out in section 47(2) of the Act being:

objectively justifiable, in that it relates to Ofcom’s general duty to secure that the best use is made of telephone numbers. It also helps to ensure that calls to “999/112” are handled more efficiently as a result of consumers’ awareness of a more appropriate number to report non-emergency issues. The proposal to make the number “101” available for “Access to Non-Emergency services” is objectively justifiable in that its provision would further the interests of citizens in relation to communications matters;

not unduly discriminatory, in that all communications providers may provide subscriber access to the non-emergency service through the use of the “101” number without application to Ofcom;

proportionate, in that the proposed modification to the Numbering Condition is the minimum revision to its provisions

necessary to provide access to the non-emergency service through the “101” number; and

transparent, in that the notification proposing the modification to the Numbering Condition and Ofcom’s reasoning is set out in this document.

6.29 Ofcom considers that it is fulfilling its duty in section 63 of the Act in making its proposals by:

securing the best use of appropriate numbers, in that the SNEN service is considered to be a service of significant public benefit which Ofcom believes would make the best and appropriate use of a 3-digit number, which is a scarce and valuable numbering resource; and

encouraging efficiency and innovation, in that provision of the “101” number aids the delivery of an innovative service that is designed to further consumers’ interests by improving their experience of reporting non-emergency issues and the handling of genuine emergency calls.

6.30 Ofcom considers that its proposals are consistent with its general duties in carrying out its functions as set out in sections 3 and 4 of the Act. In particular, it considers that the proposals further the interests of citizens in relation to communications matters and also contribute to the desirability of preventing crime and disorder.

Question 6: Do you have any comments on the proposed notification of modification to the Numbering Condition in Annex 7 of this document?

Annex 1

Responding to this consultation

How to respond

Ofcom invites written views and comments on the issues raised in this document, to be made by **5pm on 22 December 2005**.

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 2), 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.

Please can you send your response to elizabeth.greenberg@ofcom.org.uk.

Responses may alternatively be posted or faxed to the address below, marked with the title of the consultation.

Elizabeth Greenberg

Floor 4
Competition Group
Riverside House
2A Southwark Bridge Road
London SE1 9HA

Fax: 020 7783 4109

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.

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

If you have any want to discuss the issues and questions raised in this consultation, or need advice on the appropriate form of response, please contact Elizabeth Greenberg on telephone number 020 7783 4163.

Confidentiality

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 sheer that this is acceptable).

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.

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.

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

Following the end of the consultation period, Ofcom intends to publish a statement in the first quarter of 2006.

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

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.

This consultation will last for an 8 week period, which is shorter than the ten week period that Ofcom normally allows for responses to its consultations. The reasons for this are:

- the Home Office has requested a shortened timescale. It needs to progress its implementation plans for the single non-emergency number service in order to meet its first wave launch timescales and is keen to gain visibility of stakeholder views on the number and tariff and any concerns which may impact that process; and
- the standard 10 week consultation period would extend over the Christmas and New Year period, closing on 5 January 2006. Ideally, when a consultation timeframe covers a holiday period, it is extended to compensate. The Christmas and New Year period would have extended the consultation period by two weeks, bringing the deadline for comments to 19 January 2006. This extended deadline would have had an unfavourable impact on the Home Office's lead-time for service launch. As it is not considered in the interests of the SNEN service to extend the consultation period to 12 weeks, and that the 10 weeks would include a holiday period, it is considered that there is likely to be little detriment to respondents if the consultation closed after 8 weeks.

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.

National Single Non-Emergency Number

If you would like to discuss these issues, or Ofcom's consultation processes more generally, you can alternatively contact Vicki Nash 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.

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.

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: National Single Non-Emergency Number

To (Ofcom contact): elizabeth.greenberg@ofcom.org.uk

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing	<input type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	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 view that the Single Non-Emergency Number service represents a justified use of a 3-digit number?

Question 2: What characteristics do you think a service should have to be eligible to apply to Ofcom for the designation of a 3-digit number?

Question 3: Do you agree with the Home Office's view that
a) a 3-digit number is the best choice for the non-emergency service; and
b) of the 3-digit numbers available, "101" is the best option?
Please give reasons for your views.

Question 4: What are your views on the four tariff options chosen by the Home Office for specific consideration by respondents? In particular, what are your views on the Home Office's preferred tariff?

Question 5: Do you have any comments on the evaluation of options and/or the outcome of the Impact Assessment?

Question 6: Do you have any comments on the proposed notification of modification to the Numbering Condition in Annex 7 of this document?

Home Office paper on the introduction of a Single Non-Emergency Number



Evidence to Support the Introduction of a Single Non-Emergency Number

Support for the introduction of a Single Non-Emergency Number

A5.1 The sequence of events in terms of the parliamentary process is the publication of a Green Paper – a discussion document which invites views from a very wide spectrum of stakeholders. This is followed by a White Paper which has taken these views on board. It is still a discussion document inviting views from stakeholders, but has more specific intentions. The White Paper is then translated into a Bill which continues to take on board comments, but which enters the parliamentary process – put before cross-party committees, readings before the House of Commons, readings before the Lords, before eventually being passed as an Act and becoming legislation.

A5.2 In relation to the introduction of the SNEN, this has featured in two Home Office consultations within the broader heading of Police Reform. The Green Paper 'Policing: Building Safer Communities Together' published 4th November 2003. Responses were received from 400 organisations. A questionnaire was also circulated to the public asking 'Do you think a national non-emergency number is a good idea?' 5000 people responded and although not representative of every group of society it is a very helpful indication of public views. The results were as follows:

Single non-emergency number

A5.3 The concept of a single non-emergency number was first floated in the 2001 policy paper on police reform 'Policing a New Century – a Blueprint for Reform '5. In the recent consultation paper we outlined the work being taken forward to develop this and signalled our intention to widen the scope of the number so that it could also be used to access other services. We invited views on this proposal:

National Single Non-Emergency Number

‘We welcome views on the introduction of a single, three-digit non-emergency number for accessing local services’.

A5.4 There was widespread support for the introduction of this service:

‘The vast majority of respondents to the consultation paper were in favour of introducing such a number noting that it could significantly enhance the accessibility of the police and other local services to the public. The introduction of such a number could reduce the burdens currently placed on the police through calls wrongly directed to them. It was noted that the introduction of the number was not an end in itself – the quality of the response was paramount. Robust call handling systems would be needed to ensure that a good service was provided otherwise public confidence could be damaged. Some concerns were raised over how to differentiate between an emergency and a non-emergency and the confusion this might cause’.

Questionnaire

A5.5 We also raised this issue in the questionnaire and posed the following question:

Do you think a national non-emergency number is a good idea?

A5.6 A clear majority of respondents were in favour of introducing such a number:

Yes 78%; No 22%

Quote from a member of the public

“This is an excellent idea. A frequent local complaint is that people just cannot get through to their local police station by telephone. I would suggest a number which people can ring which will offer them a menu to route them say, to a desk for non-urgent police matters, the general switchboard for local authority services and a helpdesk for local health service inquiries.”

Source: ‘Policing a New Century – a Blueprint for Reform’ page 21(CM5326) available at www.policereform.gov.uk.

A5.7 The Home Office Strategic Plan 2004-08 carries the commitment to develop a Single Non-Emergency Number:

‘We also remain committed to early introduction of a three digit single non-emergency number to access not only the police but other local services.’

A5.8 Since the publication of the Home Office Strategic Plan in July 2004, the Government’s desire to see the development and implementation of a single non-emergency number has grown. In mid-September (2004), at the Superintendents’ Association, the then Home Secretary set out a ‘Coppers’

Charter' committed to making the police a more customer focused service. SNEN was a key part of this and a commitment was made again to its implementation by 2008. This was fleshed out in the Police Reform White Paper 'Building Communities, Beating Crime' (follow on from the Green Paper 'Policing: Building Safer Communities Together') in November 2004 that commits the Home Office to providing a:

'Single Non-Emergency Number for the public which will deal with non-emergency issues of policing, crime and anti-social behaviour'

- A5.9 The timescale for the SNEN is to have a core system in place in a limited number of geographical areas by the end of 2006. Initially this will be able to resolve some calls over the phone, provide advice on certain matters and, where that cannot be done, direct callers to the right person to speak to. The intention is to have a full national system in operation by 2008.
- A5.10 A total of 66 responses were received in relation to the 2004 Police Reform White Paper and were primarily from key national stakeholders, police authorities, local authorities and from groups representing specific interests such as the IT industry. 14 of the responses commented directly about SNEN of which all but one was positive. The one negative response was a concern that the SNEN would work against the development of localised strategies for delivery, to quote "We recognise that there is popular support for a Single Non-Emergency but have reservations about the practicalities and would not wish to undermine local responsiveness." The results of the consultation were not published and the preparation of the Bill is now in progress.

The Number

- A5.11 The public are currently faced with a range of numbers in order to access local authority services and police stations, many of which are not easy to remember. 83% of forces have now introduced single numbers which are in the main 0845 (reference 'Her Majesty's Inspectorate of the Constabularies'). Similarly some local authorities have introduced contact centres. A recent survey (<http://www.lg-employers.gov.uk/skills/contactcentres>) of 215 LA's found 125 had established call and contact centres (total of 410 local authorities). A further 174 were being planned or developed in England and Wales. Some LA's are also using single 0845 numbers to access their council services. However many still have a wide array of numbers and even when 0845 numbers are used they involve up to 11 digits and are not necessarily memorable.
- A5.12 The Anti-Social Behaviour Unit has also introduced an 'It's Your Call' programme in 25 areas for the reporting of anti-social behaviour. This has been successful and is supported by the public (www.together.gov.uk) using a single number and a voice recognition platform.
- A5.13 While these are very positive developments we do know that the public are faced with an array of numbers in their local areas and frequently resort to calling 999 in the absence of knowing where else to call. Currently at least 50% of calls to 999 are of a non-emergency nature. Currently BT report that of the 30.5 million calls made to the 999 service, 50% are filtered out and 15 million are passed on to emergency services. Of these 15 million, 58% are transferred to the police (8.7 million calls), 7% connected to the Fire Service, less than 1%

National Single Non-Emergency Number

to the Coastguard and 34% to ambulance services. One of the aims of the programme is to reduce calls to 999 and to the police in particular. It is estimated that 70% of 999 calls to police - 6.09 million (2002 British Crime Survey) - do not require an immediate response. - BT 999 statistics

A5.14 A key aspect of the SNEN programme therefore will be to inform the public about when to use 999 and when to use the SNEN. 999 is undoubtedly the most familiar number across the country. We want the number used to access non-emergency services to be equally memorable, yet difficult to dial accidentally. Ofcom have advised that only numbers in the 10X or 11X range be made available. The number 112 is not applicable as it is the European emergency number.

A5.15 In terms of numbers, 101 was originally discussed with Ofcom in the previous incarnation of SNEN (2001 – 2004) and the value of this was tested out with the current stakeholders. This testing took place through a mix of individual meetings, follow-ups and group meetings of key stakeholders who were presented with the single non-emergency number programme and which number would be used.

A5.16 The programme team met with a representative of BT Human Factors (a specialised consultancy unit who investigate human behaviours and habits in relation to technology) in early May 2005. This was followed by phone calls to check that we had a clear understanding of what was important. The representative had also had discussion with other colleagues prior to this meeting. The advice given was that the key was the up/down/up finger movement which would ensure that the number was less likely to be accidentally dialled, i.e. those in the 10X range. We discussed 101 and it was recognised that this fulfilled their criteria and was already known to the public.

A5.17 We met representatives from the Health and Safety Executive, and the Ergonomics Society. Their advice concurred with that of BT that numbers that require an up/down/up finger movement are least likely to be accidentally dialled with the added importance of being memorable. We raised three possibilities 105,109 and 101. Again 101 was the most memorable as it was already in the public consciousness (see Para 16) and was cited as the best number to use

A5.18 We have also had discussions with The Royal National Institute for the Blind which mentioned the raised pips around the number 5 that acts as a reference point to the rest of the key board for blind or partially sighted people. Again 101 satisfies this criteria (accepting that as do other numbers) as people are still able to identify the location of the 101 keys due to their awareness of where the pips are in relation to other keys.

A5.19 Specifically we have discussed this with our Stakeholder Group (20 organisations) – made up of representatives of police (Association of Chief Police Officers, Association of Police Authorities, Federation of Black Police Officers), Local Government Association, and voluntary sector organisations (such as the telephone Helplines Association, Victim Support, Crimestoppers); our Steering Group made up of representatives of Home Office (policing) and Office of the Deputy Prime Minister (LA's); individuals working within LA's and police forces up and down the country; a group of 50 practitioners from police forces and local authorities; and ministers.

A5.20 The number 101 does present a risk in terms of public perception due to its featuring in George Orwell's novel '1984' and the 'big brother' connotations that are associated with it. However, it is likely that the public's awareness and perceptions have been positively influenced more recently by the BBC's 'Room 101', a light hearted entertainment programme where peoples' main 'bug bears' are cast aside and this could be used in a positive way. The SNEN programme is about dealing with the public's 'bug bears' and therefore awareness of the number could be used in a positive spirit. The further benefit is that the number 101 is already in the public consciousness. Despite the risk from the media and public in terms of the perceptions, the benefits of using 101 far outweigh the risk.

A5.21 To conclude, 101 proved popular in the first iteration of the single non-emergency programme and has proved to be most popular in this next iteration because of its high memory retention, ergonomical movement over the dialling pad, least likelihood of misdialling and place in the public's consciousness. The Single Non-Emergency Team Programme team would therefore like to put forward 101 for consultation.

Annex 6



**Non-Emergency Number -
Research report, August 2005**

Publication date: 27 October 2005

Contents

Section		Page
1	Introduction	1
2	Choice of non-emergency number	2
3	Reactions to 101 - ease of remembering and suitability	4
4	Consumer intentions to use the non-emergency number	8
Annex 1	Research details	11

1: Introduction

Consumer reactions to 101 and alternatives for a non-emergency number

The Home Office is planning to introduce a new national three-digit telephone number as a non-emergency number which would be used to report crime or anti-social behaviour when it is not appropriate to call 999. The aim is to make reporting crime or anti-social behaviour more straightforward for the public and to reduce the number of unnecessary calls made to 999.

This research aims to understand consumer reactions to several alternative three digit numbers for this non-emergency service, with a particular focus on the Home Office's preferred option of 101.

BMRB were commissioned to include questions relating to the non-emergency number⁸ in their Omnibus survey between 12 and 14 August 2005. A total of 1,011 GB adults responded to the questions. This report has been prepared by Ofcom, based on results provided by BMRB Research. A copy of the questions used is attached in Annex 1.

⁸ See Annex 1 for more details about the sample and fieldwork.

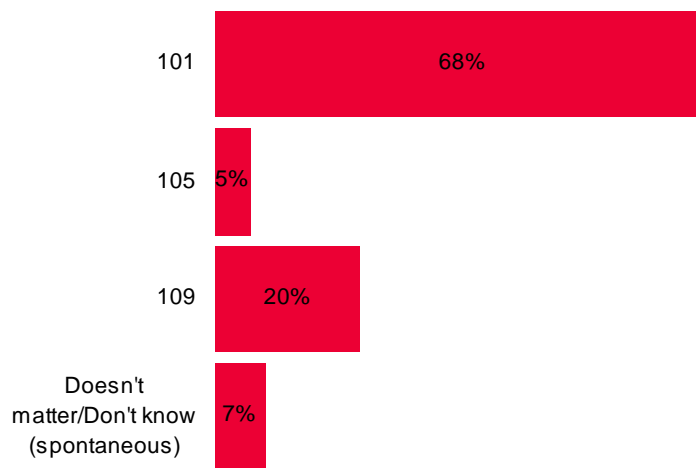
2: Choice of non-emergency number

101 was the preferred option for the non-emergency number

The concept of the non-emergency number was explained to consumers before they were asked which of the numbers 101, 105 and 109 would be their preferred option for this service.

Figure 1 indicates that the most popular choice was the number 101, with nearly seven in ten consumers saying they would prefer this to 105 (5%) or 109 (20%).

Figure 1, Consumers preferred number for the non-emergency service



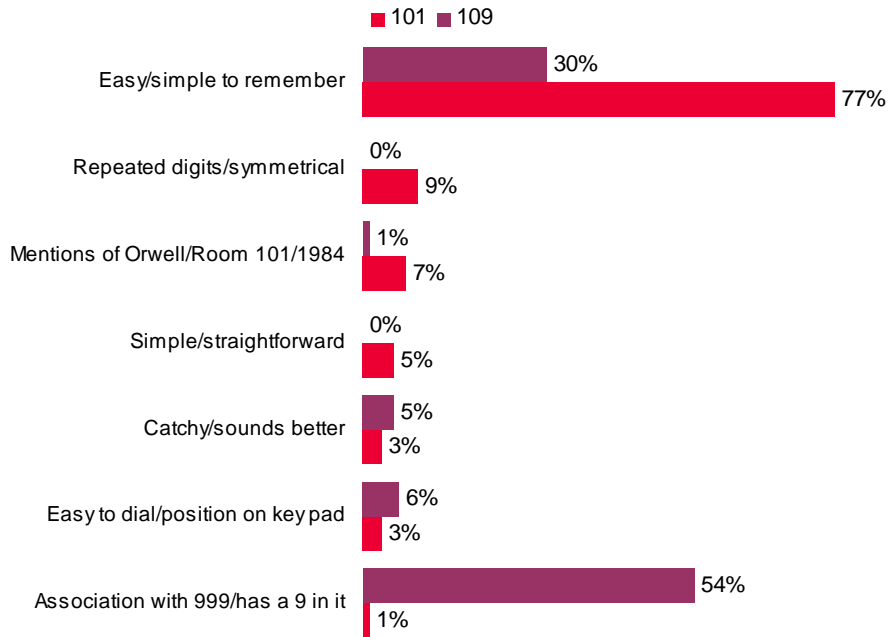
Base: all respondents (1011). Respondents were asked 'If you were able to choose, which of these numbers would you prefer as the number for this service?' and were given the choice between 101, 105 and 109 for the non-emergency number. Respondents saying either 'don't know' or 'it doesn't matter what the number is' said this spontaneously.

101 was preferred by a large majority of consumers because they find it easy to remember; 109 was preferred because of its associations with 999

Respondents were asked why they had chosen their preferred number and the verbatim responses were recorded by the interviewer. Figure 2 indicates that three quarters of consumers who said they would choose 101 as the non-emergency number said this was because it is easy to remember. Seven per cent of respondents spontaneously mentioned the connection with George Orwell or Room 101. Just under one in ten (9%) commented on two of the digits being the same and the symmetry of 101.

Thirty per cent of consumers who chose 109 said they did this because it is easy to remember, however the main reason given for their choice was the association with the emergency number 999 (54%).

Figure 2, Reasons why consumers preferred 101 or 109 as the non-emergency number



Base: all respondents who chose 101 (692) and who chose 109 (200) as the non-emergency number. Respondents' verbatim answers were recorded and these answers were later coded into the categories of answers shown above. Comments are shown when these were mentioned by over 5% for either 101 or 109.

2: Reactions to 101 - ease of remembering and suitability

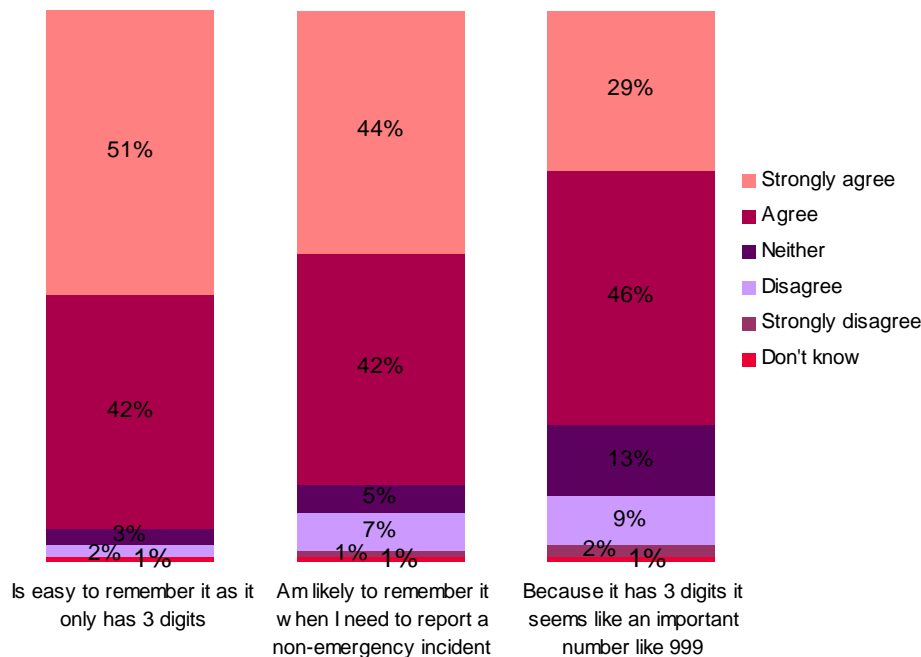
101 is considered a memorable number, and the majority of consumers thought it seemed important because of its three-digit length

In order to more fully investigate consumer reactions to 101 as the non-emergency number, consumers were asked how much they agreed and disagreed with statements relating to 101. Figure 3 shows how much consumers agreed or disagreed with these statements about the memorability of the three-digit number and whether or not the three-digit length implies that the number is important.

Consumers clearly believe that the number 101 is memorable, with 93% agreeing or agreeing strongly with the statement 'the number is easy to remember as it has only 3 digits'. The majority of consumers also claimed that they would be likely to recall the number at the point they might need to call the service, with 86% claiming they strongly agreed or agreed with this statement ('I am likely to remember the telephone number 101 when I need to report a non-emergency incident').

A majority of consumers (75%) also agreed with the statement 'because it has three digits it seems like an important number like 999', one in five disagreed with this.

Figure 3, Consumers views on 101 as the non-emergency number



Base: all respondents (1011). Respondents were asked how much they agreed or disagreed with each statement in reference to the number 101.

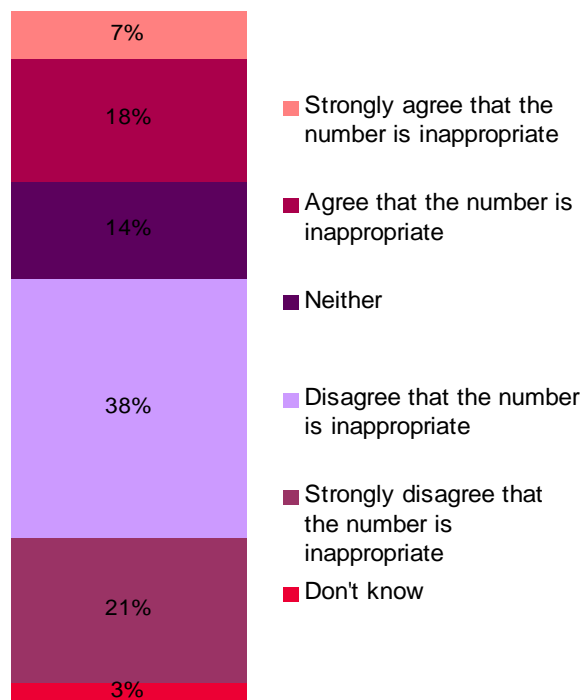
When prompted, almost 6 in 10 respondents did *not* agree that 101 was an *inappropriate* number for the non-emergency service – in other words, they thought it was an appropriate number; one in four consumers found this number *inappropriate*, the remainder were neutral

Consumers were also asked how much they agreed or disagreed with the statement ‘the number 101 has negative connotations and is not appropriate as a serious telephone number for reporting crime’.

The majority of respondents (59%) disagreed with the statement and therefore found 101 as *appropriate* for this service, and 17% either said they neither agreed or disagreed or said ‘don’t know’. However one in four (25%) agreed with the statement.

This means that *when prompted* one in four consumers did not think the number was suitable as a service for reporting anti-social behaviour or crime. However further analysis showed that *before* consumers were *prompted* to think about the suitability of 101, just over half (54%) of the consumers who said the number was *not* appropriate chose 101 as their preferred number⁹.

Figure 4, Consumers views on the *inappropriateness* of 101 as the non-emergency number



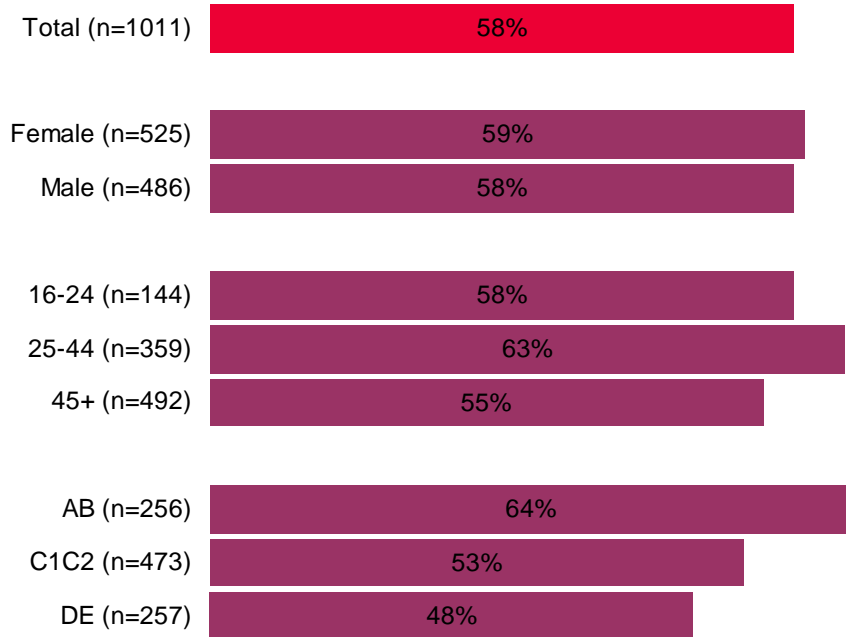
The number has negative connotations and is not appropriate as a serious number for reporting crime

Base: all respondents (1011). Respondents were asked how much they agreed or disagreed with the statement in reference to the number 101.

⁹ Base size 248. Amongst consumers who said they thought that the number was appropriate 78% gave 101 as their preferred option of the non-emergency number (base 590). The difference between these two groups of consumers is significant at the 99% confidence level.

Figure 5 shows that those of social economic group (SEG) AB are more likely than groups C1C2 and DE to think that the number is suitable for the non-emergency service(64% of SEG AB disagree that the number is inappropriate in comparison to 53% of SEG C1C2 and 48% of SEG DE¹⁰). Respondents aged between 25 and 44 (63%) are more likely to find this number appropriate than those aged 45 or above (55%)¹¹.

Figure 5, Proportion of different groups of consumers disagreeing that 101 is inappropriate as the non-emergency number (therefore that it is a suitable number)



Base: all respondent (1011) in subgroups as shown. Respondents were asked how much they agreed or disagreed with the statement 'the number 101 has negative connotations and is not appropriate as a serious telephone number for reporting crime' in reference to the number 101. This chart shows the percentages of subgroups of people who 'strongly disagreed' or 'disagreed' with this.

Men are more likely than women to think that the number is *not* appropriate and consumers over 45 years old are more likely than younger consumers to think this¹² (see figure 6). Those of social economic groups DE are more likely than groups AB and C1C2 to think the number is not suitable for the non-emergency service¹³.

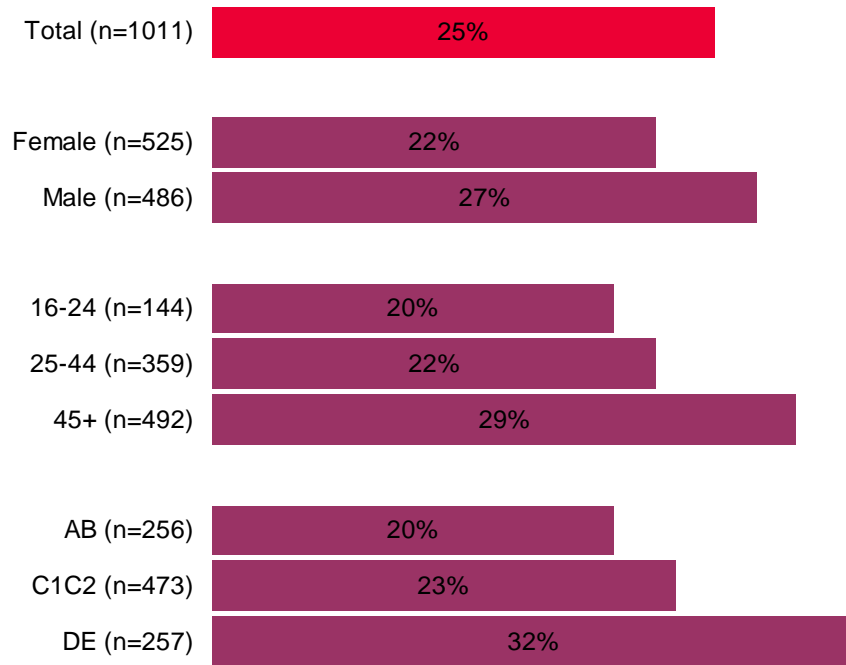
¹⁰ Significant at the 99% confidence level.

¹¹ Significant at the 95% confidence level.

¹² Both differences are significant at the 99% confidence level.

¹³ Significant at the 99% confidence level.

Figure 6, Proportion of different groups of consumers saying 101 is *inappropriate* as the non-emergency number



Base: all respondent (1011) in subgroups as shown. Respondents were asked how much they agreed or disagreed with the statement 'the number 101 has negative connotations and is not appropriate as a serious telephone number for reporting crime' in reference to the number 101. This chart shows the percentages of subgroups of people who 'strongly agreed' or 'agreed' with this.

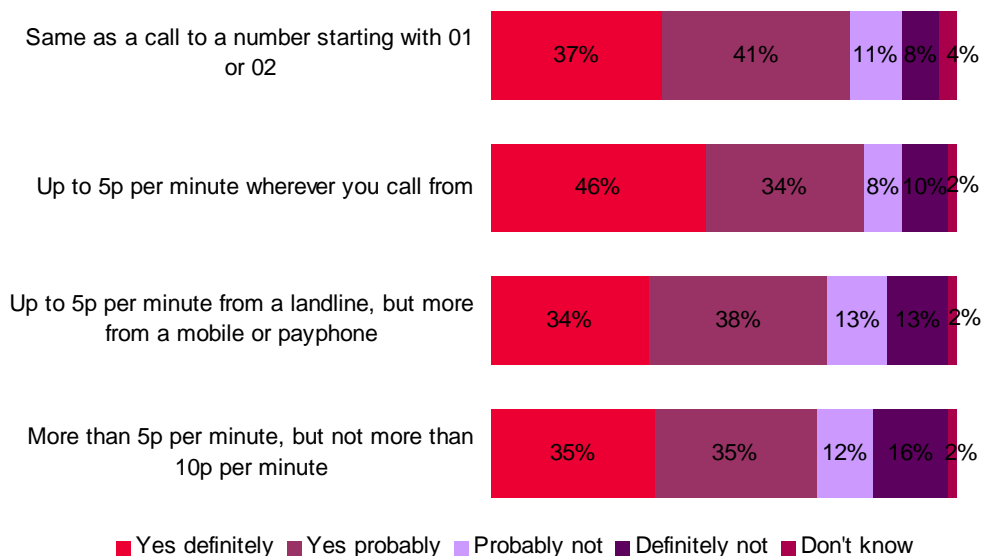
3: Consumer intentions to use non-emergency number

The majority of consumers say they would call the non-emergency number (for all call price options suggested)

Consumers were asked if they would call the non-emergency number when they needed to report an incident to their local police station or local authority if the call cost a range of different amounts¹⁴. Consumers *claimed* likelihood of calling given the different price options is shown in Figure 7¹⁵.

Across all price options given, the majority of consumers claimed that they would definitely or probably call the number if they were in a situation where they wanted to report a non-emergency incident (percentages of consumers saying this ranged between 70% and 80%).

Figure 7, Consumers claimed likelihood to call the non-emergency number for different call prices



Base: all respondent (1011). Respondents were asked if they would call the non-emergency number if the call cost a particular amount, as outlined above. They were probed about the strength of their response.

Claimed intention to use the non-emergency service was highest when the proposed price of calling was *up to 5p per minute from anywhere*¹⁶; 46% of consumers said

¹⁴ See annex 1 for the question wording.

¹⁵ Respondents gave their view on their likelihood of using the non-emergency number given different pricing options; however claimed reactions to a hypothetical situation do not necessarily represent actions that would occur if they were actually faced with the situation.

¹⁶ The proportion of consumers claiming they would 'yes, *definitely*' call the number is significantly higher when the cost is 'up to 5p per minute wherever you call from' in comparison to all other price options (at the 99% confidence level). Also the proportion of consumers claiming they would *definitely or probably* call the number is significantly

they would definitely call the number and a further 34% said they would probably call this number.

If the price was the same as a *geographic number*, 37% of consumers said they would definitely call the number and a further 41% claimed they would probably call the number. Consumers were more likely to say they would definitely or probably call the non-emergency number if the cost was the same as a *geographic number* than if it was *up to 5p from a landline but potentially more from a mobile or payphone or more than 5p per minute but not more than 10p per minute*¹⁷.

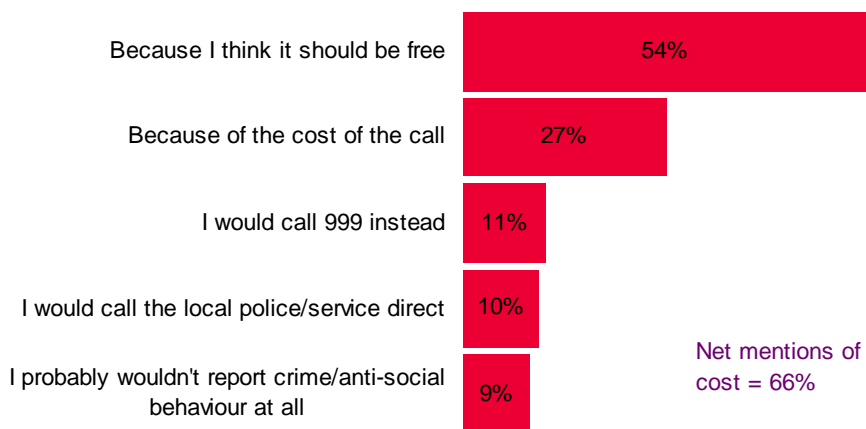
When consumers were told that the cost to the non-emergency number would be *up to 5p from a landline but potentially more from a mobile or payphone* 34% said they definitely would call the number and 38% said they would probably use the number. One in four (26%) consumers said they would not call the number at this price.

If the price was to cost *more than 5p per minute but not more than 10p per minute* 35% said they would definitely call the number and another 35% said they probably would call the number. Just over one in four consumers (28%) said they wouldn't call the number at this cost.

Consumers who claimed they would not call the number cited the cost of the call as a reason for this; many said that this service should be free

Just over one in ten of the respondents (11%) did not say they would call the non-emergency number for *any* of the price options given (i.e. they showed no intention to use the non-emergency number). This group were asked for the reasons they believed they wouldn't use this service. Figure 8 shows the responses to this question.

Figure 8, Reasons why consumers said they would not call the non-emergency number



Base: all respondents who claimed no intention to use the non-emergency number, excluding those who said 'don't know' to each price option (107). Respondents' verbatim answers were recorded and these answers were later coded into the categories of answers shown above. More than one response may have been made by each respondent. Mentions over 8% are shown in the table.

higher when the cost is 'up to 5p per minute wherever you call from' in comparison to 'up to 5p per minute but more from a mobile or payphone' and 'more than 5p per minute, but not more than 10p per minute' (at the 99% confidence level).

¹⁷ Significant at the 99% confidence level.

The wording of the question about consumers' intentions to call the non-emergency number directly referred to prices, therefore this may have encouraged responses about pricing. However it is clear that for the consumers who rejected the service, there is a feeling that the service should be free to call (54% of those not planning to call the number said this). Other reasons given included the intention to call 999 even though it is a non-emergency situation (11%), to call the local service directly (10%) and not to report the situation at all (9%).

Annex to research report

Research details

Fieldwork

Fieldwork was conducted between 12 and 14 August 2005. All interviews were carried out over the telephone using computer assisting interviewing (CATI) as part of BMRB's Omnibus research.

Sample

The data found within this report is based on 1011 GB adults aged 16 or more. The data was weighted to ensure a nationally representative picture and the weighted bases are noted in figures within the report.

Questionnaire

INTRODUCTION

SAY TO ALL

The Government is planning to introduce a new national 3 digit telephone number. This number would be used to report crime or anti-social behaviour when it is not appropriate to call '999' because it is not an emergency.

If you reported crime or anti-social behaviour through this national number, the information would then be passed to your local police station or relevant organisation, or you would be given advice if this was more appropriate. The aim is to make reporting things like this more straightforward for the public.

INTERVIEWER: READ OUT IF NEEDED: Reporting crime or anti-social behaviour could include things like reporting abandoned cars, drug dealing, street drinking, prostitution, nuisance behaviour like setting fires, intimidation, harassment or vandalism amongst other things.

Q1

ASK ALL

If you were able to choose, which of these numbers would you prefer as the number for this service?

READ OUT - SINGLE CODE

- 101 (SAY: ONE-OH-ONE)
- 105 (SAY: ONE-OH-FIVE)
- 109 (SAY: ONE-OH-NINE)
- Does not matter to me what the number is (DO NOT READ OUT)
- Don't know

Q2

ASK IF RESPONDENT CHOSE A NUMBER AT Q1

(IF Q1 = 101 or Q1 = 105 or Q1 = 109 THEN ASK Q2)

Why did you choose that number in particular?

WRITE IN VERBATIM

- (Open answer/Don't Know)

National Single Non-Emergency Number

Q3

ASK ALL

Thinking about the number 101 (SAY: ONE-OH-ONE) in particular, could you tell me how much you agree or disagree with the following statements...

INTERVIEWER: PROBE FOR STRENGTH OF AGREE/DISAGREE

This question is repeated for the following:

- *The number is easy to remember as it has only 3 digits*
- *Because it has three digits it seems like an important number like 999*
- *The number 101 has negative connotations and is not appropriate as a serious telephone number for reporting crime*
- *I am likely to remember the telephone number 101 when I need to report a non-emergency incident*
- Strongly agree
- Agree
- Neither agree/nor disagree
- Disagree
- Strongly disagree
- Don't Know

Q4

ASK ALL

It is unlikely that a call to the non-emergency number would be free. Would you call this number to report a non-emergency incident to your local police station or local authority if the call cost the following amounts?

INTERVIEWER: PROBE FOR STRENGTH OF RESPONSE

This question is repeated for the following:

- *The same as a call to a number starting with 01 or 02 (an area based telephone number)*
- *Up to 5p per minute wherever you call from*
- *Up to 5p per minute from a landline but maybe more from a mobile or pay phone*
- *More than 5p per minute, but not more than 10p per minute*
- Yes definitely
- Yes probably
- Probably not
- Definitely not
- Don't Know

Q5

ASK IF RESPONDENT SAYS THEY WILL NOT CALL THE NUMBER FOR ALL COST
OPTION

IF 'Probably not' or 'Definitely not' or 'Don't Know' is given at all 4 loops of Q4 (excluding respondents who said Don't Know at all 4 loops) THEN ASK: 5

Why would you not use this number?

DO NOT READ OUT. MULTI CODE.

CODE AS APPROPRIATE. USE 'OTHER' CODE IF NECESSARY.

- Because of the cost of the call/it's too expensive
- Because I think it should be free
- I wouldn't remember the number
- I would call the local police/local service directly
- I would call 999 instead
- I probably wouldn't report crime/anti-social behaviour at all
- Don't Know
- Other (Other specify...)

Annex 7

Notification of proposals for a modification to the Numbering Condition

Notification of proposals for a modification to the provisions of General Condition 17 of the General Conditions of Entitlement under section 48(2) of the Act

1. Ofcom, in accordance with section 48 of the Act, hereby makes the following proposal for a modification to the provisions of General Condition 17.
2. The draft modification to General Condition 17 is set out in the Schedule to this Notification.
3. The effect of the modification is set out in the accompanying consultation document.
4. The reasons for making the proposal are set out in the main body of the accompanying consultation document.
5. Ofcom considers that the proposed modification complies with the requirements in section 47(2) of the Act.
6. In making the proposals referred to above, Ofcom has 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. Representation may be made to Ofcom about the proposal by 22 December 2005.
8. Copies of this Notification have been made available to the Secretary of State.
9. In this Notification-

“Act” means the Communications Act 2003;

“General Condition 17” 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; and

“Ofcom” means the Office of Communications.

Signed by

A person authorised by Ofcom under paragraph 18 of the Schedule to the Office of Communications Act 2002

27 October 2005

National Single Non-Emergency Number

Schedule

The following shall be inserted after “100*” in Table 1 in the Annex to General Condition 17 of the General Conditions of Entitlement. Note: the asterisk denotes a number beginning or in entirety that is designated for access to the service as set out in the adjacent column-

101*	Access to Non-Emergency Service (Type A Access Code)
------	---

Annex 8

Glossary of terms

Communications Provider

A person who provides an Electronic Communications Network or provides an Electronic Communications Service.

Electronic Communications Network

(a) a transmission system for the conveyance, by the use of electrical, magnetic or electro-magnetic energy, of signals of any description; and
(b) such of the following as are used, by the person providing the system and in association with it, for the conveyance of the signals -
(i) apparatus comprised in the system;
(ii) apparatus used for the switching or routing of the signals; and
(iii) software and stored data.

Electronic Communications Service

A service consisting in, or having as its principal feature, the conveyance by means of an Electronic Communications Network of Signals, except in so far as it is a content service.

Emergency Organisation

In respect of any locality:

(a) the relevant public police, fire, ambulance and coastguard services for that locality; and
(b) any other organisation, as directed from time to time by Ofcom as providing a vital service relating to the safety of life in emergencies.

Geographic Area Code

A Telephone Number identifying a particular geographic area.

Geographic Number

A Telephone Number, from a range of numbers in the National Telephone Numbering Plan, where part of its digit structure contains geographic significance used for routing calls to the physical location of the Network Termination Point of the Subscriber to whom the Telephone Number has been assigned, or where the Network Termination Point does not relate to the Geographic Area Code but where the tariffing remains consistent with that Geographic Area Code.

National Numbering Scheme (“the Scheme”)

The day-to-day record of telephone numbers allocated by Ofcom in accordance with the National Telephone Numbering Plan, and as provided for in Section 56(3) of the Communications Act.

National Telephone Numbering Plan (“the Plan”)

A document setting out Telephone Numbers available for allocation and restrictions on the Adoption and other uses of those numbers, and as provided for in section 56(1) of the Communications Act.

Numbering Condition

General Condition 17 of the General Conditions of Entitlement.

National Single Non-Emergency Number

Number Translation Services (“NTS”)

Telephone services using the following numbers: Special Service numbers (including freephone, special service basic rate, special service higher rate and premium rate). Within these ranges calls to 0844 04 numbers for Surftime internet access services and calls to 0808 99 numbers for FRIACO (Flat Rate Internet Access Call Origination) are excluded.

Pence-per-call (“ppc”)

A retail price structure where the price of the call does not depend on the duration of the call.

Pence-per-minute (“ppm”)

A retail price structure where the price of the call depends only on the duration of the call.

Significant Market Power (“SMP”)

The Significant Market Power test is set out in European case law, the new EU Communications Directives and the Commission’s SMP Guidelines. It is used by the National Regulatory Authorities such as Ofcom to identify those Communications Providers who must meet additional obligations under the Access Directive.

Telephone Number

Subject to any order of the Secretary of State pursuant to section 56(7) of the Act, any number, including data of any description, that is used (whether or not in connection with telephony) for any one or more of the following purposes:

(a) identifying the destination for, or recipient of, an Electronic Communication; (b) identifying the origin, or sender, of an Electronic Communication; (c) identifying the route for an Electronic Communication; (d) identifying the source from which an Electronic Communication or Electronic Communications Service may be obtained or accessed; (e) selecting the service that is to be obtained or accessed, or required elements or characteristics of that service; or (f) identifying the Communications Provider by means of whose network or service an Electronic Communication is to be transmitted, or treated as transmitted.