

Representing the Communication Services Industry



Proposal for the withdrawal of the 0500 Number Range
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Introduction

The Federation of Communication Services is the UK trade association for the communication services sector. Our 350 members and associates deliver products and services by means of copper, fibre and radio. We are pleased to have the opportunity of responding to this detailed consultation document on behalf of our members who deliver numbering services to Service Providers, those that are TCPs and those who are Service Providers. More information and a directory of our members is available on the [FCS website](#).

Key points

In our response to Ofcom's April 2012 consultation on the Non Geographic Call Services (NGCS) review, we clearly supported the key objective of Ofcom's proposals. Namely, to build consumer trust in the non geographic ranges - by improving pricing transparency and trust so that callers to non-geographic and premium rate numbers are fully aware of the cost of the call they are making and are content to do so.

We also noted that this needs to be balanced against the need for flexibility of both the end user businesses and organisations who use non-geographic numbers and the communication providers who support them; to ensure that using non-geographic numbers will add value for all. In this way, we believe that the decline witnessed in the NGCS market over recent years can be reversed.

The vast majority of FCS members also support Ofcom's proposals that 0800 and 116 calls should be free to call from mobiles and all other phones

Our overriding consideration with regard to the current consultation, therefore, is to support the objective of improving clarity and understanding for end users. We believe that withdrawal of the 0500 range will simplify and improve understanding of the Freephone ranges. For this reason, taking into consideration the extremely low levels of traffic on 0500 numbers and the equally low levels of awareness among end users, we support Ofcom's proposal.

While we understand the rationale for considering a 24 month implementation period (in terms of reducing cost and disruption for affected service providers and CPs), we believe that the objectives of the NGCS review would be best supported by a quicker timescale for withdrawal of the range. We therefore support the 18 month option proposed by Ofcom.

Consultation questions

Analysis of options for 0500

Question 5.1: Do you agree with the assessment criteria we have used for our analysis, in particular the two additional criteria we have identified as relevant?

We agree that the criteria selected for use in Ofcom's analysis are appropriate and comprehensive. As noted above, we believe that it is important that the cost of using 0800 numbers is clear and unambiguous and agree that ofcom is correct to consider this in its

deliberations on the 0500 range. Efficient use of numbers is also a key concern for our members so we support the inclusion of these additional criteria.

Question 5.2: Do you agree with our assessment of the options for the 0500 range? In particular, do you agree with our preferred option of withdrawing the 0500 range? If not, please explain why.

We believe that Ofcom's assessment of the options is fair and reasonable and agree that Ofcom's conclusion to withdraw the 0500 range is the correct decision.

Question 5.3: Do you have any comments on the analysis presented on the costs and benefits of our preferred option? Please provide evidence to support your comments.

No comment

Implementation

Question 6.1: Do you support a longer implementation period of 24 months for the withdrawal of 0500 numbers? Or, do you consider that 18 months would be a preferable timescale for this withdrawal? Please explain your reasoning as well as providing any evidence to support your view.

As noted above, we believe that an 18 month implementation period is preferable.

Question 6.2: Do you have any other comments on our proposed approach to the withdrawal of the 0500 range and withdrawal of 0500 number allocations? Do you have any suggestions on making consumers and service providers aware of this change?

We have no further comments.

Question 6.3: Are there any other implementation issues which need to be taken into account?

We have not identified any further issues which we believe Ofcom needs to consider.

We trust that the above is helpful and would be happy to discuss any points of detail further.