

*Representing the Communication Services Industry*



Simplifying Non-Geographic Numbers Consultation  
Issued 15 April 2013

FCS Response – 28 May 2013

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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](#).

We have restricted our response on this occasion to the following general points:

- In its response to Ofcom's April 2012 consultation, FCS expressed the view that, without a cap on access charges, the measures proposed to increase transparency and trust in the non geographic ranges were unlikely to be effective. While we recognise some of the additional protections required by Ofcom relating to the access charge (one access charge per tariff package), we continue to believe that lack of certainty of the total cost to the customer remains the single biggest barrier to achieving genuine transparency for consumers. It seems clear that customers will continue to be confused and resistant to calling numbers where they will incur a further unknown access charge in addition to the stated service charge.
- We are concerned by the fact that the new requirements on the unbundled tariff and free calls to 0800 will apply only to consumers (i.e. residential customers). While we recognise that Ofcom has no powers to impose these requirements on services for business customers, we do not share the view that other commercial factors will lead CPs to offer the same terms to business customers as to residential customers. Similar expressions of optimism by Ofcom in the past (i.e. charging by the mobile operators for calls to 0870) have proved to be unfounded.
- This difference in the rules for residential and business customers will also make the negotiation of commercial terms within the supply chain (e.g. outpayments) more difficult as it will not be possible to determine whether the caller is a business or residential client. Implementation and compliance with the requirements for provision of pricing information by service providers will also be far more complex.
- The implementation of changes to billing systems is also likely to be complex and will require the provision of clearer guidance on which approaches to provision of additional information to customers meet Ofcom's requirements.
- The regulation and enforcement of obligations on service providers to publish service charges on advertising and promotional material must be proportionate. A simple code of practice should suffice. We do not believe that there is any justification for a PRS type regime involving, for example, PhonepayPlus.
- We note that new number ranges will be required to support the new range of Service Charges with which they will be directly associated and call on Ofcom to ensure that sufficient number blocks are available for use by CPs at all levels of the supply chain.

- The new powers granted to Ofcom under the re-drafted GC17.20 are extremely widely drawn. We believe that the new drafting should include an explicit sunset clause causing these powers to fall away progressively following implementation.
- We do not believe that Ofcom has fully considered the additional costs associated with originating calls by resellers. These will need to be fully reflected in the model to ensure that resellers do not lose money when originating calls to free to call numbers. Ofcom must ensure that their proposals do not competitively disadvantage resellers as would be the case if costs are not covered for this type of call.
- We reiterate a comment on the 2012 consultation, that the documentation on which industry is asked to comment is much too lengthy and detailed to enable proper consideration by any but the largest companies
- Finally, FCS is keen to ensure that the interests of smaller and niche operators are properly represented and taken into consideration in the engagement and implementation phase. We are encouraged that Ofcom has proposed an appropriately inclusive process and are keen that this remains the case. Key decisions should not be made in exclusive groups such as the NGCS Forum.