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Dear Elizabeth

### **Conserving geographic numbers**

This response has been prepared on behalf of relevant member groups within the Federation of Communication Services, including our Numbering, VoIP and Fixed Service Providers groups, representing more than 150 service providers and resellers providing inbound call solutions, hosted VoIP and other fixed telephony services. A list of our members can be found on the FCS website - [www.fcs.org.uk](http://www.fcs.org.uk)

We welcome the opportunity to respond this consultation which proposes the implementation of number conservation measures to a number of additional geographic areas.

We support the specific action proposed by Ofcom at this stage as numbers represent a finite resource which must be conserved to ensure that appropriate number ranges are available to communications providers to facilitate the provision of new and innovative services.

However, we believe that Ofcom needs to take a more radical approach to this area in the longer term. Changes in technology and the nature of the competitive telecoms market suggests increasing demand for numbers from an increasing number of communications providers.

FCS has supported the creation of a central database of numbers as proposed by Ofcom in its proposals for number portability. FCS members concerned believe that the creation of such a database will provide a range of benefits in management of numbers generally including not only more effective and flexible, allocation & conservation of numbers but also improvements to new number build on networks and the actual processes for managing number portability. It is important that Ofcom has a long term strategy for the management of numbers which enables changes to be effectively communicated to end-user customers in a timely way.

We also believe that Ofcom should consider implementing arrangements for reclaiming unused numbers where entire blocks of 1,000 numbers have not been used, including where the 1,000 number block in question is part of a 10,000 block originally allocated

Finally, we believe that all of the above points apply equally to non-geographic ranges. There are, for example, large volumes of unused numbers which could beneficially be re-allocated in the 0800 range.

We have no specific response to make on the points of detail contained in the consultation questions

We trust that the above is helpful. Our members would be happy to meet with Ofcom to discuss any of the issues raised in greater detail.

Yours sincerely

A handwritten signature in blue ink that reads "Michael Eagle". The signature is written in a cursive, slightly slanted style.

Michael Eagle  
General Manager