

*Representing the Communication Services Industry*



Geographic telephone numbers –safeguarding the future of  
geographic numbers  
Issued 25 November 2010

FCS response- 18 February 2011

Contact for response:  
Jacqui Brookes OBE, CEO

Federation of Communication Services Ltd  
Burnhill Business Centre,  
Provident House,  
Burrell Row,  
Beckenham, Kent  
BR3 1AT  
Tel: 020 8249 6363  
E-mail: [fcs@fcs.org.uk](mailto:fcs@fcs.org.uk)  
Web: [www.fcs.org.uk](http://www.fcs.org.uk)

## Introduction

The [Federation of Communication Services](#) represents over 300 businesses delivering products and services via wireless, copper and fibre technology. Over 50% FCS members are smaller CPs and new entrants that deliver telephony services into the residential and business markets; this sector is growing. This response has been prepared on behalf of the Numbering Group within the Federation.

## Key issues

We welcome the opportunity of responding to this consultation on Ofcom's management of geographic numbers. Telephone numbers are a finite resource and ready access to the numbers they need by all CPs is fundamental to maintaining innovation and competition in the industry. We are pleased that Ofcom is taking action to ensure the availability of this resource but are concerned that any new regulation must be fair and proportionate and not disadvantage smaller or new entrant companies.

## Ofcom consultation questions

### Section 2: Introduction

Question 1: Do you have any comments on the objectives and approach to this review of geographic number management? Do you agree with the policy principles that we consider should inform the review?

We agree that it is essential for Ofcom to properly manage the whole numbering stock, including the 1 billion numbers in the numbering plan. It is important to ensure that competition between number range holders is fair and that companies with millions of unused numbers do not receive preferential treatment

### Section 4: Providing new supplies of geographic numbers

Question 2: Do you agree that we should not consider further at this stage options that would change existing numbers?

Yes.

Question 3: Do you agree that local solutions are appropriate based on our current forecasts of anticipated requirement of more numbers?

Yes.

Question 4: Do you agree with our assessment of the options for providing new supplies of numbers in four-digit code areas, as presented in Section 4 and in Annex 3?

No comment.

Question 5: Do you agree that closing local dialling followed, if necessary, by the introduction of an overlay code should be the preferred option for providing new supplies of numbers in four-digit areas that may need them? Please give reasons for your answers, and provide evidence where possible.

Yes. Ofcom's own research shows that individual consumers would prefer the option of closed local dialling to having an overlay code

Question 6: Are there any other number supply measures that we should consider for four-digit areas?

No comment

Question 7: Do you agree that we should merge five-digit codes with four-digit codes to create new supplies in five-digit code areas that need them? Do you have any comment on our assessment of the impacts of the options we have considered? If so, please provide relevant evidence where possible.

No comment

Question 8: Are there any other numbers supply measures that we should consider for five-digit areas?

No comment

Question 9: Do you agree with our considerations and preliminary conclusions on how new supplies of numbers should be provided where they are required?

No comment

Question 10: Do you have any comments on how the implementation of number supply measures should be planned?

No comment

Question 11: How long do you consider that CPs would need to plan the implementation of the preferred options for four- and five-digit areas?

No comment

Question 12: If you are a CP, what costs do you consider that your company would incur if the preferred options for four- and five-digit areas were implemented?

No comment

## **Section 5: Reducing the need for new supplies of geographic numbers**

Question 13: Do you think that we should reserve a limited amount of numbers for allocation in blocks of 100 numbers in area codes where it is feasible to do so?

Yes

Question 14: What criteria, if any, in addition to a 'first-come first-served' basis should be used for allocating such blocks of 100 numbers to providers?

No comment

Question 15: Should the geographic extent of such allocations be limited to the seven areas likely to run out of numbers for allocation before 2015? (i.e. Blackpool (01253); Bournemouth (01202); Bradford (01274); Brighton (01273); Derby (01332); Langholm (013873) and Middlesbrough (01642))

No comment

Question 16: Do you consider that there are any technical obstacles currently to the effective sharing of number blocks by CPs and to sub-allocation? How could we usefully address those obstacles?

Sub allocation works well for the WLR sector. Fixed number portability processes have been under discussion and review for several years as pressure mounts on providing a more effective process to accommodate new entrant operators and VoIP service providers. In our view a Central Database for all numbers is long overdue, and if this is developed sub allocation may no longer be required as the gaining provider would take ongoing responsibility for the customer's number

Question 17: What are your views on the concept, practicalities and implications of introducing a reservation system for geographic numbers?

No comment

Question 18 Do you have any comments on our proposed scope of additional audits?

We agree that audits are essential for the proper maintenance of the numbering stock and should be directed specifically at the companies with large unused number blocks derived from the historical allocations of 10,000 number blocks in order to encourage them to release number back into the number stock.

## **Section 6: Charging for geographic numbers**

Question 19: Do you agree with the high level objectives proposed for the charging regime?

No comment

Question 20: Do you envisage that sub-allocation would increase if number charging is introduced? Do you have any comments on our analysis of barriers to successful use of sub-allocation?

No comment

Question 21: Do you agree with our view on how charges could be set? If not, please propose an alternative approach with supporting evidence.

No comment

Question 22: Do you agree with our preferred option for charging for geographic numbers? (i.e. Option 2 Pilot scheme: Charge a flat rate of 10p per number per annum in area codes with 100 or fewer blocks of 1,000 numbers (no charge for other areas). If not, please state your reasoned preference.

We worry that this is a dangerous precedent but understand the need. Our view is that so long as this applies at the 10p per number rate and only to newly allocated conservation area blocks of 1,000 numbers, we would have no great concern. If we started to see this creep into other blocks or to previously allocated ranges, our view would be radically different.

Question 23: Do you agree that the threshold for including an area code within the pilot scheme should be 100 or fewer 1,000-number blocks remaining to allocate? If not, please state your preferred threshold and reasons.

No comment

Question 24: Do you agree with the proposed level of the charge (i.e. 10p per number per annum)?

We believe that this should be a maximum and retained at this level for some years; no doubt there will be pressures in future to develop an EU norm.

Question 25: Are there any other incremental administrative costs likely to be incurred by CPs in relation to number charging? Can you estimate the magnitude of any such cost?

No comment

Question 26: Do you agree that we should not pursue a policy of charging for golden geographic numbers? If you do not agree, please provide your reasoning.

No comment

#### **Annex 4: Cost recovery for number charges when the CP using the number is different from the range holder**

Question 27 Do you have any views on the principles for cost recovery? Do you have any views on the cost recovery mechanism? Do you agree with the preferred approach?

No comment