



Geographic Telephone Numbers



UKCTA Response to Ofcom Consultation

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Final

Introduction

UKCTA¹ is a trade association promoting the interests of competitive fixed-line telecommunications companies competing against BT, as well as each other, in the residential and business markets. Its role is to develop and promote the interests of its members to Ofcom and the Government.

Geographic numbers are a key part of UKCTA members' voice businesses. UKCTA fully understands that geographic numbers are becoming scarce in certain areas of the UK and welcomes Ofcom's initiative to address the issue.

In the consultation Ofcom have made five proposals of which UKCTA members share a common position on two:

- Remove **Local Dialling** in protected areas to release further number ranges
- Strengthen Ofcom's **Administrative Procedures** and reclaim allocated number blocks that remain unused.

UKCTA members' primary objective is that Ofcom remains able to allocate new geographic number ranges according to demand and that this is achieved with minimal disruption or cost to CPs and end users alike.

Local Dialling

UKCTA believes that if selective removal of the ability to locally dial is the price to pay for not having to carry out number change, or to introduce measures which damage competition, then it is the 'least worst' option. UKCTA therefore supports Ofcom's proposal to remove local dialling in areas where new numbers are in short supply. One of UKCTA's members encourages Ofcom to consider removing local dialling in all area codes and not just the protected areas.

In areas where local dialling is removed Ofcom should minimise customer confusion with consumer education activities.

UKCTA notes that paragraph B3.1.3 of the National Telephone Numbering Plan would need to be altered to remove the obligation on CPs to provide local dialling in the affected areas.

¹¹ www.ukcta.org.uk

Ofcom Administrative Procedures

Ofcom states that it will tighten its administrative procedures in relation to the allocation of telephone numbers. UKCTA supports Ofcom's intention but urges Ofcom to go further and actively reclaim unused number blocks from CPs in the restricted areas.

Ofcom states that geographic numbers are allocated to around 300 CPs. However, there are far fewer CPs (around 50) who are actively using geographic numbers in any significant quantities and this strongly suggests that there are many allocated number ranges that are not being used.

Ofcom should therefore use its powers under the Communications Act to enquire of CPs with allocated number ranges in restricted areas how the numbers are currently used.

- First, where a CP has multiple 1K number blocks within a restricted area, and unallocated numbers remain in more than one block six months after allocation, any totally unallocated 1K blocks should be reclaimed under General Condition 17.11.
- Second, where there are 1k number ranges within 10k number blocks allocated in restricted areas, Ofcom should prevail upon CPs to return the unused number ranges. (Ofcom refer to this procedure in paragraph 3.53 and 3.54 of the consultation)

Overlay Codes

UKCTA is concerned at the prospect of overlay codes being introduced.

Whilst overlay codes would immediately double the quantity of numbers available for protected areas there are disadvantages which make the solution undesirable.

First the new code will be unfamiliar to end users. Ofcom's research shows that consumers and businesses value the geographical significance of 01 and 02 codes but clearly newly created codes will not carry any significance.

Second, since the overlay code does not have the 'value' of the original code, CPs who are forced to take allocations from the new overlay code will be disadvantaged in comparison to the incumbent and long established CPs. This raises a serious competition issue.

UKCTA therefore urges Ofcom to consider every other possible solution first, and to regard the use of overlay codes as an absolute last resort before the highly disruptive and expensive option of a number change.

Digit Lengths



In the Section 135 information requests made in 2010, Ofcom referred to two options that are not proposed in this consultation.

For the avoidance of doubt, UKCTA would not support any proposals that would involve changing existing numbers, other than the specific case of geographic number ranges which are of a shorter length than the generality of the National Telephone Numbering Plan.

Neither would UKCTA support any proposal to change the numbers of digits in the National Telephone Numbering Plan.