

The **Ofcom** consultation - "[Simplifying Non-geographic Numbers - Detailed proposals on the unbundled tariff and Freephone](#)" ends on Wednesday 27 June.

Only those with a commercial interest are likely to respond in full to the 60-odd detailed questions. It is vital that these responses are balanced by those with a simple consumer perspective endorsing the essential proposal from **Ofcom** that:

Those who charge for telephone calls should declare their charges.

This Ofcom proposal demands support

The simple proposal is expressed in two ways:

- Those who offer "**Freephone**" numbers, beginning 080, should always meet the full cost of the call, whether from a landline or mobile phone.
- Those who use 084 numbers which, like 087, 09, 070 and 118 numbers, cause money to be paid to the benefit of the person called, should declare the "**Service Charge**" from which they benefit. The proposal is for this charge to be "**unbundled**" from the telephone company's "**Access Charge**", which must be simplified and advised separately.

Fundamental to the proposal is the fact that the 03 range will continue to be the only non-geographic numbers for which callers pay no more than the cost of a call to a geographic number. Many users of 084 (and perhaps 080 numbers) will wish to migrate to this range.

The present (unacceptable) situation

- Only the cost of calls to 080 numbers from landlines is presently met by users. Mobile callers pay for calls to "**Freephone**" numbers, except where special arrangements apply.
- Although the arrangements for calls to 084 numbers are identical to those for those numbers classed as being used for "**Premium Rate Services**", users of 084 numbers are not obliged to declare the "**Service Charge**" from which they benefit.

Even with "**Premium Rate Services**", it is only the minimum call cost that has to be advised by the user. The telephone company does not have to indicate how much of the charge is to its benefit and how much is passed on to the benefit of the person called.

Users of 084 and PRS numbers are able to implicitly or explicitly misrepresent the cost of calling by giving meaningless examples and comparisons. The imperative need for many to move to 03 numbers has not been fully recognised (*examples of cases follow on p2*).

Responding to the consultation

The fair telecoms campaign urges positive support for the Ofcom proposals.

Whilst there may be many points of contention in the fine detail, there is no question that these proposals represent a sizeable, and long overdue, move towards pricing transparency. They will undoubtedly have the effect of creating much greater fairness.

Responses to the consultation, which may, BUT NEED NOT, address each of the detailed questions, must be submitted no later than Wednesday, 27 June. This can be done by using [this online form](#) (tiny.cc/ofcomresponse).

The effect which we expect the proposals to produce ...

... on current users of 084 numbers who can justify their charge

There may well be some users of 084 numbers who will be content to declare the "**Service Charge**" (of up to 7p per minute) which they currently impose on callers. This will be made transparent only when it is **unbundled**. It is obviously right that those who pay this charge are aware of it, and the value that it has to the person they are calling.

... on other current users of 084 numbers

Those who could not possibly be open about the fact that they are themselves charging callers will have to give up use of 084 numbers, before their charge is **unbundled**. They should do this NOW. If they want to wait to endure the shame of escaping being compelled to be honest at the last moment, let us hope that the proposals are implemented swiftly.

Examples of those who should by now be completing their transition from 084 to "**geographic rate**" 03 numbers are:

- **HM Revenue and Customs**
- **DWP agencies**, including **JobCentre Plus** and the **Pensions Service**
- **NHS GPs** and **NHS bodies** who require the benefits of non-geographic numbers
- All those offering **service, enquiry** and **complaint** lines who cannot justify a charge on customers for contacting them by telephone.

... on users of 080 numbers

There can be little question that calls to a **Freephone** number must be free of charge to the caller. The need to apply this simple principle overrides some reasonable concerns.

Some organisations may be forced to withdraw 080 numbers because of the additional cost incurred in meeting the cost of calls from mobiles and also in receiving many more calls, because mobile users will no longer be inhibited from calling these numbers.

Because calls to "**geographic rate**" numbers (including 03) are now most commonly covered by an "**inclusive package**", those currently using 080 numbers may well find that costs can be saved, without any significant impact on callers, by moving to a 03 number. If worthy of consideration, such a move should be completed immediately so that mobile callers may benefit before the proposals are implemented.

... on telephone companies

The **unbundled** tariff will bring transparency to the element of the charge added by the telephone company itself (the "Access Charge"). This should bring an end to the excessive surcharges which are currently imposed in many cases, e.g. adding 39p per minute to a call charge where only 2p per minute is being passed to the called party.

Causing users of 080 **Freephone** numbers to meet the full cost of the call from mobiles will ensure that the charges made by the mobile companies are clearly seen in an internal market. As with the **unbundling** of charges for calls to other non-geographic numbers, this will remove the opportunity for profiteering which exists where tariffs are highly complex.