

Comments in advance of Ofcom's Mobile Call Termination Review 2017

Ofcom's national telephone numbering plan specifies UK mobile numbers start 071xx to 075xx and 077xx to 079xx, with, additionally, 07624 being one of the many prefixes allocated to mobile numbers based in the Isle of Man. Other numbers starting 076 are allocated to pagers. Numbers starting 070 are personal numbers. Numbers starting 070 and 076 are generally charged at a premium rate.

Only normal UK mobile numbers are included in call allowances. Due to their high termination rates, mobile numbers allocated in Jersey, Guernsey and Isle of Man are often excluded from allowances as are numbers starting 070 and 076. Some numbers that appear to be UK mobile numbers have also been excluded from allowances due to their high termination rates, but this practice should have ended after Ofcom capped the charges for terminating these calls in May 2015.

Early history

For many years, Ofcom has set a cap on termination rates for calls to UK mobile numbers and decreased this on an annual basis (usually in April).

The 2003 MCT review set rates effective from 1 April 2004 until 31 March 2007.

The 2006 MCT review set rates effective from 1 April 2007 until 31 March 2011.

The cap on termination rates for incoming calls applied only to the main mobile providers.

For consumers, the effect of these changes was seen in massively increased allowances in call packages on mobile phones - but not all mobile numbers were included in the allowances.

Some UK mobile numbers were used for call-forwarding and other automated and interactive services. Higher termination rates paid for provision of these services, but this meant calls to these numbers remained non-inclusive.

Some UK mobile providers, such as Lyca Mobile, and others, also set their termination rate at a much higher level than normal. Calls to mobile numbers allocated to these providers also remained non-inclusive. Likewise calls to mobile numbers allocated in Jersey, Guernsey and Isle of Man were, and still are, non-inclusive.

The 2010 MCT review set the termination rates effective from 1 April 2011 until 31 March 2015.

While the MTR cap applied only to the rates set by the five (now four) main mobile providers, smaller UK providers were told to charge "fair and reasonable rates" but not all appear to have done so.

Recent History

The 2014 MCT review identified (in tables 4 and 6 of Ofcom's Consultation Document^[1]) various providers with SMP, the applicable number ranges allocated to them, and the level of MTR set by each of these organisations. It showed some providers continuing to charge termination rates of up to 12p per minute - far in excess of the cap set by Ofcom on the main mobile providers, which by now was well under 1p per minute.

The resulting MCT Final Statement^[2] was published in March 2015 and covered the period from 1 April 2015 until 31 March 2018. It set a requirement for ALL mobile providers identified in Tables 5 and 7 of the Final Statement document to conform to the new MTR cap effective 1 May 2015 and to further reductions announced thereafter.

Expectations for retail pricing

I had imagined the expected result of the change to the MTR cap would be for all UK mobile numbers starting 071 to 075 and 077 to 079 to become inclusive in call allowances, except for mobile numbers allocated in Jersey, Guernsey and Isle of Man. So far, this has not happened.

Numerous landline and mobile providers appear to be continuing to charge extra for calls to many of the mobile prefixes allocated to the smaller mobile providers detailed in Tables 5 and 7 of the March 2015 MCT Final Statement. Reasons for this could include:

- terminating providers continuing to charge termination rates above the cap set by Ofcom,
- departments responsible for setting retail call charges remaining unaware that termination rates for these ranges have decreased,
- failure to update the lists of these so-called "non-mobile" ranges, perhaps now out-of-sync with actual charges and inclusivity, or
- simple profiteering by landline and mobile phone companies by way of charging extra for calls that now have compliant termination rates.

There is some evidence for all four of these being applicable factors to varying degrees - depending on which provider's retail price list is examined.

Current retail charges

Retail price lists from landline and mobile providers usually (but not always) detail the various number ranges with additional or non-standard charges. The various lists detailing prefixes with non-standard charges may give some clues as to which 07 mobile ranges may still have termination rates that exceed Ofcom's MCT cap.

The situation as researched in January 2017 (with some later additions in April 2017) is as detailed in the final section of this document.

[1] https://www.ofcom.org.uk/__data/assets/pdf_file/0016/74221/mct_consultation.pdf

[2] https://www.ofcom.org.uk/__data/assets/pdf_file/0029/76385/mct_final_statement.pdf

Termination rates

There is anecdotal evidence that some mobile number ranges may still have termination rates set above Ofcom's cap.

For example, it is alleged that 074181 pays out 6p per minute revenue share.

See <https://www.arneswinnen.net/2016/07/how-i-could-steal-money-from-instagram-google-and-microsoft/>
and <https://www.arneswinnen.net/wp-content/uploads/2016/02/8.png>

Several providers have recently added 078221 to their lists of "non-mobile" numbers. This may or may not be due to high termination rates.

Outdated lists

There is evidence that some of the lists provided by landline and mobile providers are not accurate or up to date. These lists may or may not be out of sync with actual retail charges. For example, the list provided by Three hasn't been amended since 2011 and several ranges listed as being "non-mobile" numbers have since been re-allocated to the main mobile providers, e.g. 075378 and 075379 are number ranges used by Three themselves. Tariff lists provided by Three, O2, giffgaff and many others indicate those two ranges and many others are still being charged as "non-mobile" numbers and they are so charged by at least O2 and giffgaff.

Profiteering

There are some examples which appear to be profiteering. For example, 1p mobile openly charge extra for calls to Lyca Mobile numbers but Lyca's termination rates are believed to have complied with Ofcom's MCT cap at least several years ago.

General lack of clarity in retail price lists

Mobile providers tend to list the prefixes that are exceptions to their standard retail charges for calls to mobile numbers. This makes it relatively easy to see which prefixes are non-inclusive and/or charged at a different rate to that charged for calls to standard mobile mobiles. Despite the supposed reduction in mobile termination rates, these lists still include a large number of 07 prefixes belonging to mainland UK providers.

Landline providers tend to list every 07 prefix in a huge table often running to dozens of pages. They assign a tariff code to each prefix and the charges for each of those tariff codes are listed elsewhere. This makes it very difficult to look up the prices and even more difficult to spot the prefixes that are non-inclusive and charged at a different rate. Additionally, nowhere in their lists is there a clear statement of which of those tariff codes represent calls that count towards inclusive allowances or not. I can see how consumers easily become confused.

Details of so-called "non-mobile numbers" published in retail price lists

The data below has been collected on a variety of dates during the first few months of 2017.

Mobile providers

1p Mobile <https://www.1pmobile.com/tariff-and-charges.taf>

Non-UK-mobile 07 numbers (including LycaMobile ranges - 07404, 07405, 07424, 07438, 07448, 07459, 07466, 07417, 07440)

Lycamobile is most certainly a UK provider and their termination rate is believed to comply with Ofcom's MCT cap.

EE (mobile) <http://ee.co.uk/non-standard-prices>

07744, 07755, 0775520, 0775522, 0775530, 0775533, 0775544, 0775555.

EE (mobile) <http://ee.co.uk/content/dam/ee-help/Help-PDFs/07%20ranges%20OOB%20241114.pdf>

074585, 078221

giffgaff <https://www.giffgaff.com/pricing>

074060, 074061, 074062, 074063, 074064, 074065, 074066, 074067, 074068, 074069, 074171, 074172, 074176, 074177, 074179, 074181, 074182, 074185, 074186, 074188, 074390, 074391, 074410, 074411, 074412, 074414, 074415, 074417, 074418, 074419, 074515, 074516, 074517, 074572, 074574, 074577, 074578, 074579, 074582, 074583, 074584, 074588, 074653, 074655, 075200, 075201, 075203, 075204, 075205, 075207, 075208, 075209, 075370, 075373, 075375, 075376, 075377, 075378, 075379, 075590, 075591, 075592, 075593, 075595, 075597, 075598, 075599, 075710, 075718, 075890, 075891, 075892, 075893, 075898, 075899, 077001, 077442, 077443, 077444, 077445, 077446, 077447, 077448, 077449, 077530, 077552, 077553, 077554, 077555, 078220, 078221, 078222, 078224, 078225, 078226, 078227, 078229, 078644, 078727, 078730, 078744, 078745, 078922, 078925, 078930, 078931, 078933, 078938, 078939, 079110, 079112, 079118, 079245, 079780, 079781, 079784, 079785, 079786, 079787, 079789.

Lyca Mobile <http://www.lycamobile.co.uk/sysimages/editorfiles/PDF/uk%20special%20mobile.pdf>

074060, 074061, 074062, 074063, 074064, 074065, 074066, 074067, 074080, 074081, 074082, 074088, 074089, 074172, 074176, 074177, 074179, 074180, 074181, 074182, 074183, 074184, 074185, 074186, 074187, 074188, 074189, 074408, 074409, 074410, 074411, 074414, 074418, 074419, 07451, 074510, 074511, 074512, 074513, 074514, 074515, 074518, 074519, 074520, 074521, 074522, 074523, 074570, 074571, 07520, 075201, 075202, 075203, 075204, 075205, 075206, 075207, 075208, 075209, 075373, 075376, 075377, 075590, 075592, 075593, 075595, 075597, 0755971, 075598, 075599, 075718, 075890, 075891, 075892, 075893, 075894, 075895, 075896, 075897, 075898, 075899, 077000, 077001, 077003, 077007, 077008, 07744, 077444, 077445, 077446, 077447, 077448, 077449, 07755, 077554, 0775540, 0775541, 0775542, 0775543, 0775545, 0775546, 0775547, 0775548, 0775549, 077555, 0775550, 0775551, 0775552, 0775553, 0775554, 0775556, 0775557, 0775558, 0775559, 077856, 07797, 078220, 078221, 078222, 078223, 078224, 0782244, 0782245, 078225, 078226, 0782262, 0782268, 078227, 0782270, 078228, 078229, 078360, 078361, 078368, 078369, 078644, 078722, 078727, 078730, 078744, 078745, 078920, 078921, 078925, 078930, 078931, 078933, 078938, 0789382, 0789387, 078939, 07911, 079112, 079118, 079240, 079241, 079242, 079243, 079244, 079245, 079246, 079247, 079248, 079249, 079780, 079781, 079782, 079783, 079784, 079785, 079786, 079787, 079788, 079789 (this list also includes a small number of prefixes that are obviously mobile numbers allocated in CI or IoM, indicated by ~~strikethrough~~. Paradoxically, a number of the known CI and IoM prefixes are missing from this list).

O2 <http://www.o2.co.uk/popups/specialnumbers-popup-07>

074060, 074061, 074062, 074063, 074064, 074065, 074066, 074067, 074068, 074069, 074171, 074172, 074176, 074177, 074179, 074181, 074182, 074185, 074186, 074188, 074390, 074391, 074409, 074410, 074411, 074412, 074415, 074417, 074418, 074419, 074515, 074516, 074517, 074572, 074574, 074577, 074578, 074579, 074580, 074583, 074584, 074653, 074655, 075200, 075201, 075203, 075204, 075205, 075207, 075208, 075209, 075370, 075373, 075375, 075376, 075377, 075378, 075379, 075590, 075591, 075592, 075593, 075595, 075597, 075598, 075710, 075718, 075890, 075891, 075892, 075893, 075898, 075899, 077000, 077001, 077442, 077443, 077444, 077445, 077446, 077447, 077448, 077449, 077530, 077552, 077553, 077554, 077555, 078220, 078221, 078222, 078224, 078225, 078226, 078227, 078229, 078644, 078722, 078727, 078730, 078744, 078745, 078922, 078925, 078930, 078931, 078933, 078938, 078939, 079110, 079112, 079118, 079245, 079780, 079781, 079782, 079783, 079784, 079785, 079786, 079787, 079789.

Plusnet Mobile <https://www.plus.net/help/legal/mobile-price-guide/> (see popup note)

074061, 074062, 074063, 074065, 074068, 074181, 074577, 075201, 075207, 075208, 075209, 075371, 075377, 075590, 075595, 075597, 075598, 075718, 075890, 075891, 075892, 075893, 076660, 077001, 07744, 077442, 077443, 077444, 077445, 077446, 077447, 077448, 077449, 07755, 077552, 0775520, 0775522, 077553, 0775530, 0775533, 077554, 0775544, 077555, 0775555, 078220, 078221, 078223, 078224, 078225, 078226, 078227, 078229, 078360, 078644, 078727, 078730, 078744, 078745, 078921, 078922, 078930, 078931, 078933, 078938, 078939, 079112, 079118, 0795398, 079780, 079781, 079784, 079785, 079786, 07978620000, 079788, 079789.

Sky Mobile <http://www.sky.com/shop/terms-conditions/mobile/tariff-guide>

http://www.sky.com/shop/terms-conditions/mobile/tariff-guide/__PDF/Sky-Mobile-Specialised-Numbers-Guide-30Nov2016.pdf

Hundreds of prefixes starting 071 to 075 and 077 to 079 were listed as 'personal numbers' and charged at a higher rate. This included prefixes listed by other providers as being "non-mobile numbers" or "CI and IoM mobile numbers".

Sky Mobile <http://www.sky.com/shop/terms-conditions/mobile/tariff-guide>

http://www.sky.com/shop/terms-conditions/mobile/tariff-guide/__PDF/Sky-Mobile-Specialised-Numbers-Guide-28Apr2017.pdf

Errors found in earlier guides appear to be mostly fixed, but 074585, 078360, 078361, 078369 and 079110 are still erroneously listed as "personal numbers".

Talk Mobile <https://talkmobile.co.uk/rate-307> and other pages

07744, 07755

Tesco Mobile <http://www.tescomobile.com/help-and-support/1818-call-charges/1820-pay-monthly/call-charges-for-pay-monthly>

077000, 07744, 07755, 078221, 078225, 078921, 078730, 078930, 078931, 079112, 079118, 079245, 079246, 079879.

A recent change is that the prefix 078221 has been *added* to this list.

Three http://www.three.co.uk/_standalone/Link_Document?content_aid=1220489068227 (numbered page 5 / page 6 of file)
074060, 074061, 074062, 0740659, 074067, 0740671, 0740672, 0740673, 0740674, 0740675, 0740676, 0740677, 0740678, 0740679, 074176, 074181,
0741821, 0741822, 0741823, 0741824, 0741825, 0741826, 0741827, 0741828, 0741829, 074185, 074411, 074414, 074515, 074572, 074886, 074888,
075200, 075201, 075203, 075204, 075205, 075207, 075208, 075209, 075370, 075373, 075375, 075376, 075377, 075378, 075379, 075580, 075581, 075582,
075590, 075591, 075592, 075593, 075594, 075595, 075596, 075597, 075598, 075710, 075718, 075890, 075891, 075892, 075893, 075898, 075899, 077001,
077442, 077443, 077444, 077445, 077446, 077447, 077448, 077449, 077552, 077553, 077554, 077555, 078220, 078221, 078223, 078224, 078225, 078226,
078227, 078229, 078644, 078727, 078730, 078744, 078745, 078920, 078922, 078925, 078930, 078931, 078933, 078938, 078939, 079111, 079112, 079117,
079118, 079245, 079246, 079780, 079781, 079784, 079785, 079786, 079788, 079789.

Three http://www.three.co.uk/Support/non_standard_07
074060, 074061, 074062, 074067, 074176, 074181, 074182, 074187, 074189, 075200, 075201, 075203, 075204, 075205, 075206, 075207, 075208, 075209,
075370, 075371, 075373, 075375, 075376, 075377, 075378, 075379, 075580, 075581, 075582, 075590, 075591, 075592, 075593, 075594, 075595, 075596,
075597, 075598, 075599, 075710, 075718, 075890, 075891, 075892, 075893, 075898, 075899, 077000, 077001, 077442, 077444, 077445, 077446, 077447,
077448, 077449, 077552, 077553, 077554, 077555, 078220, 078221, 078223, 078224, 078225, 078226, 078227, 078229, 078644, 078722, 078727, 078730,
078744, 078745, 078920, 078922, 078925, 078930, 078931, 078933, 078938, 078939, 079111, 079112, 079117, 079118, 079245, 079246, 079780, 079781,
079782, 079783, 079784, 079785, 079786, 079788, 079789. This list has remained unaltered since 2011. Some of these ranges now belong to Three.

Virgin Mobile http://help.virginmedia.com/system/selfservice.controller?CMD=VIEW_ARTICLE&ARTICLE_ID=160209
07744, 07755.

Vodafone <http://www.vodafone.co.uk/explore/costs/call-charges/index.htm>
07744, 07755.

Equivalent lists were **not** found on the web pages of ASDA Mobile, BT Mobile, Co-op Mobile, iD mobile, Lebara Mobile, TalkTalk Mobile.

Landline providers

BT http://www.bt.com/pricing/current/Call_Charges_boo/1631_d0e5.htm#1631-d0e5
Codes starting fw and some of those starting fm seem to be charged more than calls to mobile numbers.
e.g. 079789 and very many others.

Co-op Home Phone <https://www.thephone.coop/help/landlines/call-costs/>
Information extremely difficult to follow.

EE Home Phone <http://ee.co.uk/content/dam/ee-help/Help-PDFs/home-broadband/EE-Home-Price-Guide.pdf>
Codes starting wififw and fw seem to be charged more than calls to mobile numbers.
e.g. 079785 and many others.

First Utility <https://cdn.first-utility.com/wp-content/uploads/2016/10/FirstUtility-Telecoms-Price-List-5.pdf>

"Standard UK Mobile charges apply to all mobile calls other than those in the following charge bands: FM09, FM10, FM11, FM13, FM14, FM15, FM16, FM17."
Many of these tariff codes appear to cover prefixes allocated to mobile providers.

Plusnet (landline) <https://www.plus.net/help/legal/residential-phone-tariffs/>

Plusnet appears to apply the same charging for all calls to mobile numbers including those in the Channel Islands and Isle of Man.

Post Office Home Phone <http://www.postoffice.co.uk/broadband-phone/home-phone> and <http://www.postoffice.co.uk/broadband-phone/prices>
<http://www.postoffice.co.uk/dam/jcr:bf8ff347-6a8c-4c8c-9afd-875df2ddbefd/pdf/Broadband-and-Home-Phone/Number-Ranges-v6.pdf>

Long, confusing prefix list assigning tariff codes to various prefixes. Lists are NOT in prefix order!

<http://www.postoffice.co.uk/dam/jcr:816ffb77-8c23-425f-8464-4d5c9dd55677/Calling-Plans-and-Pricing-Tables-v16-March-2017.pdf>

The above document also explains that the following prefixes are "premium rate" (some are numbers allocated in CI or IoM, others are UK numbers):
074181, 074184, 074520, 074521, 074522, 074523, 075203, 078221, 078229, 078920, 078939, 079781, 079782, 079783, 079786, 079787.

Sky Talk http://www.sky.com/shop/__PDF/SkyTalkSpecialisedPhoneNumbers.pdf

Codes starting fw and some of those starting fm seem to be charged more than calls to mobile numbers.
e.g. 079789 and very many others.

TalkTalk <http://help2.talktalk.co.uk/how-much-do-uk-calls-cost>

Codes starting fw and some of those starting fm seem to be charged more (15p or 20p/min) than calls to mobile numbers (12.5p/min).

Virgin Media http://store.virginmedia.com/content/dam/eSales/Downloads/011116_Everyday_Call_Charges_V1.pdf

Codes starting fw seem to be charged at a different rate to that for calls to mobile numbers.

Vodafone Home Phone <http://www.vodafone.co.uk/priceguide>

Codes starting GBRWFFW, GBROSVFM, NTS_fm and others seem to be charged more than calls to mobile numbers.
e.g. 079785 and very many others.

Zen <https://www.zen.co.uk/yourhome/phone/mobile-tariffs/> and <https://www.zen.co.uk/yourhome/phone/other-service-numbers/>

Codes starting MOBILE_FM and WIFI_SERVICES_FW seem to be charged more than calls to mobile numbers.

These comments are submitted ahead of the anticipated MCT 17 review which is expected to set mobile termination rates covering the period 1 April 2018 to 31 March 2021.

Ofcom's investigation ("Ofcom own initiative monitoring and enforcement programme into compliance with mobile termination rate (MTR) caps" – announced 4 April 2017) into the first of those three points is a welcome development. This report is additionally forwarded to those investigators.