fair telecoms campaign **consultation response**

Response to First consultation: Future of telephone numbers

The **fair telecoms campaign** is pleased to respond to the "First consultation: Future of telephone numbers".

We offer comments on the key issues raised in the consultation, followed by responses to the formal consultation questions.

We note that these issues are addressed in a preliminary manner at this stage and look forward to responding to further consultations as the formation of policy becomes more specific.

There is clear overlap with other recent consultations, to which we have responded as follows:

- Response to Ofcom consultation - Future of interconnection and call termination
- Response to Ofcom consultation - Promoting trust in telephone numbers

In addition to those points on which response is explicitly invited, we offer comment, with weight, on other matters raised in the consultation document.

Some matters require action by **Ofcom** to affirm and consolidate the position outlined. We feel it to be proper to press our views on these matters and the necessary action.

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Using numbers "to identify calling parties"

We see it as vital to address a common misconception - the idea that a number (provided as CLI) "identifies" the calling party.

If the number is **recognised** and trusted then it may assist with the identification of a caller through a "Caller Display" facility, possibly linked to an address book.

If the number is not recognised, or thought to be possibly faked, then it provides no useful information whatsoever. If it is a geographic number, then it may give a clue as to the location of the caller, but this is widely recognised as not being of any real value.

The notion that the place of a number (given as CLI) in the calling plan could have any proper bearing on a decision to answer a call is absurd. There is no question that people would like some assistance with this decision and that many techniques are deployed in doing so. There can however be no way of structuring a number plan to provide any worthwhile assurance in this way.

Other ways of callers identifying themselves before a call is answered may become available (e.g. by a string of text giving a name). Such a facility would change the situation dramatically.

The problem with this, as with all types of assistance with the decision about whether or not to answer a particular incoming call, is that no such system could ever be available in all cases and be guaranteed to be secure. Ultimately, there will always be voice telephone calls where the identity of the caller will have to be established by the sound of their voice and what they say.

The right of any user to refuse all calls from unrecognised or unknown numbers must remain. Short of that, there is no way that anything can be done with numbers to remove the risk of answering unwanted calls.

Voice call screening

For those who wish for appropriate protection, there is a well-proven solution available - **trueCall**. This has endorsement from **BT** (which has adopted it on its landline handsets) and **HMG** (which funds its provision to those with dementia and related vulnerability to nuisance). **The trueCall approach** has also been adopted as a network service by **Talk Talk** and **Sky Talk**.

We campaign for its adoption by all network service providers (landline and mobile). The potential to demand such provision by regulation could arise, under the terms of the e-privacy regulations as currently drafted.

Put simply, **the trueCall approach** challenges all unrecognised callers to identify themselves, by voice, before they are connected. If they respond to this prompt (which, it is found, most nuisance callers and scammers do not) then the phone rings, the identifying message is heard and the call may either be accepted or rejected. As well as the powerful protection from unwanted calls, this approach ensures that all wanted calls, perhaps from unexpected numbers, get through.

Predictable call costs

It is stated that an important feature of the **National Numbering Plan** is to enable the cost of calling a particular number to be predictable, according to the form of the number.

We note that **Ofcom** is committed to return to this position, after things have been allowed to drift, through the creation of many anomalies, notably with 07 numbers.

We trust that the removal of all significant anomalies will be completed promptly, so that a new **National Numbering Plan** will be able to offer much greater (if not total) call cost predictability.

070

Current work on the 070 range addresses only termination rates. Work on termination rates for smaller anomalous 07 blocks has not achieved the desired impact on retail charges.

It is only the latter effect which matters here. Regulatory intervention in respect of retail prices (a more challenging task) has to be considered, although we must hope that it will not be necessary.

076

Unlike the 070 range, there is little evidence of numbers from this range being misused, despite them looking like normal mobile numbers. The 07624 block presents an additional anomaly.

Insofar as it needs to be retained for its intended use, this range may be seen as being “mostly harmless”. Its presence however disturbs reference to all “07” numbers, as being identical.

Jersey, Guernsey and the Isle of Mann

The existence of numbers used to call these offshore territories, with different charging regimes, but within the 01 and 07 ranges, is a matter of severe concern.

This is not so great in the case of landlines, for two reasons. Firstly, because distinct area codes - 01534, 01481 and 01624 respectively, apply. Secondly, the location based nature of geographic numbers means that most callers will be aware that they are calling somewhere outside the UK. There is however the danger of normal call charges being expected to apply because of the form of the number.

There is a list of over 70 separate five-digit 07 mobile ranges covering these territories. Given roaming arrangements, there can be no assurance that any such number will only be used to call someone located in their home area. Furthermore, the very nature of mobile numbers means that they may be offered without any reference to the home location of the person or business being called. There have also been a number of scams perpetrated to exploit this confusion.

The most desirable resolution for this issue would be for arrangements to be made to eliminate differences in termination rates, and hence retail charges. This would create the cost predictability intended as a feature of the **National Numbering Plan**.

It must surely be an objective for all three relevant authorities - **Ofcom**, **CICRA** and the **IoM Communications Commission** - to see equalisation with UK rates for calls between the territories, notwithstanding their respective territorial duties and the complications involved in setting rates.

Extra effort to achieve such a situation would be derived from a determination to eliminate exceptions to cost predictability in the (so-called) “**National” Numbering Plan**. Noting that existing international agreements may present an obstruction, it must surely be proposed that if equalisation in retail treatment cannot be obtained, then migration of these offshore mobile ranges to one or more discrete blocks must be seriously considered, and probably undertaken.

Use of the 084 and 087 ranges

Having played a leading role in the campaign to halt use of these numbers, the **fair telecoms campaign** is delighted with what has been achieved so far.

The **UK Calling** project, the **Cabinet Office** directive for central government departments to cease use of these numbers and the prohibition on their use for customer service lines, through the **Consumer Contract Regulations**, have represented major landmarks in these efforts.

Compliance with these regulatory provisions has been at a higher rate than may have been expected, albeit that there are still many breaches.

Awareness of the unsuitability of these ranges, other than for the provision of Premium Rate Services, has led to many notable examples of abandonment of their use where this is not required by regulation. Many further such cases of abandonment can, and should, be secured.

We urge **Ofcom** to join us in stressing the unsuitability of use of these ranges. We outline this in a briefing – The 'insanity' of using 084 or 087 numbers - even when it is permitted.

The hope is for use of these ranges to fall away yet more swiftly, through a natural programme of migration, before implementation of the measures covered by this consultation occurs.

Our essential point is that there can be no justification for a "Service Charge" unless some specific, additional service is being provided in the course of the telephone call.

Where telephone calls are being used for purchasing items (commonly tickets) it is far more sensible and economic to apply a "telephone booking/order charge" as a premium added to the cost of the purchase. It may be that additional costs incurred in handling orders in this way may justify a premium charge. There is however no reason to cause the overhead of the "Access Charge" to be incurred, nor indeed any need to use a separate micro-payment mechanism.

Another significant point is that such a premium charge could readily be waived in cases where it was illegal or not justified, e.g. a post sales enquiry made using a familiar or well promoted number, or use of telephone booking when a web booking facility had temporarily failed.

There can be no place for "pseudo-Premium Rate" in a revised numbering structure. The 09 prefix is widely recognised as being used for Premium Rate Services. Migration of all such services away from the 084 and 087 ranges (should application of a Service Charge wish to be retained) must be a part of what is to come. There would be no immediate need to re-use these ranges.

This must be seen as the next step to follow the **UK Calling** project. Initially, positive pressure for migration of services away from the 084 and 087 ranges – generally to 01, 02 or 03 (notably 034 / 037) with the removal of an unjustifiable Service Charge – must be the focus.

We would nonetheless urge for an indication that all numbers with a Service Charge, at any level, will be classified as being used for Premium Rate Services and migrated to the 09 range under the forthcoming new **National Numbering Plan**. We see this as helping to focus the minds of those who need to consider whether or not they wish their services to be classified in this way.

Inclusive calling plans

The consultation document does well to explain the current reality of the general situation. The overwhelming majority of calls actually made to geographic-rate (01, 02, 03) and standard mobile (most 07) numbers incur no call charge. Some form of inclusive plan is generally a component of every telephone service arrangement. For anyone but those who make calls very rarely, these plans offer the best value to consumers.

There are exceptional cases, some of which are notable. For example, **Three** offers only a PAYG tariff based on 3p per minute, 2p per text and 1p per megabyte. This is set against most PAYG providers who offer inclusive packages, which deliver similar costs.

The most notable exception is **BT**. Quite perversely, the **BT** landline inclusive plans, with the "weekend only" plan as the minimum and default, exclude calls to mobile numbers. Equally perversely, calls to 0845 and 0870 (but not 0844/3 or 0871/2) numbers are covered by these plans. The fact that **BT** holds the most allocations of blocks of numbers in the 0845 and 0870 ranges surely cannot be irrelevant to this odd offering, which can serve to distort understanding of the cost of calling 084 and 087 numbers in general.

Ofcom clearly and confidently lays out this general position in the consultation document. However, despite much urging from the **fair telecoms campaign**, it has done little to address the common false perception that all telephone calls are subject to a call charge.

Ofcom's own Call costs guide refers to inclusive packages as being the exceptional case, after giving (out of date) examples of '**Penalty Charges**' (see below) as if these were the norm. The same false position is reflected in the government publication Call charges and phone numbers.

As we look to move forward, it is important that we catch up with the reality of the situation as it stands today. Endorsement and affirmation of the false understanding must cease. Victims of this misunderstanding, who may be disadvantaging themselves by unnecessarily paying **Penalty Charges**, must be helped to make the best decision to suit their needs.

Penalty Charges

Where calls to geographic-rate (01, 02, 03) and standard mobile (most 07) numbers that are covered by the terms of inclusive packages are made outside of the relevant terms, they are subject to what may fairly be called a **"Penalty Charge"**.

The rates applied clearly indicate these to be **Penalty Charges**. A non-inclusive weekday daytime call to a geographic-rate (01/02/03) number from a BT landline is subject to a call setup fee of 23p plus 15p per minute. For example, a seven minute call would therefore cost £1.28. The cost of only two such calls per week (or fewer longer, or more shorter, calls) would exceed (at £10.24) the monthly cost of £9.99 incurred on upgrading to the fully inclusive call plan.

The **Penalty Charge** incurred on exceeding the allowance for a mobile phone is typically 55p per minute. It is therefore vitally important that these charges are not presented as though they are the normal cost of making such calls. This distorts a proper impression of the market – and indeed the differential between standard calls and premium rate calls. All effort must be made to stress the importance of consumers selecting the calling plan appropriate to their needs.

"Local" numbers and abbreviated dialling

The consultation document addresses the issues around local numbers fairly and proposes a sound approach to the considerable challenges posed by the removal of the PSTN constraints.

The fact that many of these constraints may already be circumvented, e.g. by out of area numbers and by presentation CLI, means that one must not be too precious about protecting something that is already undermined. Public acceptance of the abandonment of the assumed geographic significance of the form of 01/02 numbers will however not be readily achieved.

One factor relevant to **local dialling** is the proper form for the presentation of telephone numbers. The relevance of this is diminished by national-only dialling. The long ranging battle over the mis-representation of numbers in forms such as 0207 xxx xxxx may have to come to an end if the full number is invariably required for dialling. Veterans of this battle from the side of propriety may have to retire, but we will be comforted by the knowledge that we were right all along!

Automatic prefixing

We suggest that the absence of **local dialling** be covered by an "automatic prefixing" feature when dialling numbers beginning 2-9, other than 999.

This facility – the addition of a specific user-defined prefix (probably the "local" dialling code) – could be made available by both network service providers and suppliers of handsets.

The design of such of feature would be to add the user's defined dialling prefix, whenever a number, other than one beginning with "0" or "1" or "999", was dialled.

Whilst provision of such a feature would be universal, i.e. not related specifically to cases where **local dialling** was being removed, it would meet the essential consumer need in such cases as well as enabling abbreviated dialling to numbers with a particular prefix, for each consumer.

This proposal recognises the need to assess what demand there would be for such a feature. This is however closely allied to assessment of the impact of removing "**local dialling**".

As well as smoothing the path to national-only dialling, such a feature would also effectively restore the benefit of **local dialling** for cases where it has previously been withdrawn.

Common numbering for landlines and mobiles

If such an approach were to be adopted, technical issues surrounding differences in approach for the two types of delivery networks may need to be considered, given that differential charging issues can be fully resolved.

There will be many people who would wish to migrate their established landline number to a mobile service. Indeed, one suspects that many landlines are retained largely because the number is well known and published in directories.

If call re-direction (temporary and permanent) can be achieved without the dual termination and dual charging situation that exists at present, this will have a serious impact on use of services. Given the scale of the move from landlines to mobiles for personal users, it may be that any distinction will become meaningless in a relatively short time.

Number allocation

There is reference here, as in the earlier consultation, to the fact that allocation to providers may be able to shift to smaller blocks, given the lessening of the constraints which applied to the PSTN.

It is however stated that call routing will be exclusively on the basis of each individual number. This surely begs the question of why blocks of numbers have to be allocated to providers at all.

Numbers in the **National Numbering Scheme** are a public resource. Under the PSTN these had to be allocated in blocks. Given that there is no longer any such need, this raises a number of questions.

- ? Is it right that a service provider should have control over a public resource – given that some components (memorable numbers) will have a commercial value?
- ? Should a number be "owned" (insofar as there is such a concept) by the person or organisation to which it is assigned for use, rather than the service provider who assigned it?
- ? Who will be in control of the central number and routing database and how will the integrity, reliability and general operation of this national resource be regulated?

We understand that no firm decisions on these matters have yet been taken, nor are there any specific proposals presented for consultation. We also recognise that, as we move from the present situation to that which will ultimately pertain (i.e. when the constraints of the PSTN are fully removed), there may need to be transitional arrangements in place.

The important point which we wish to make, possibly open to dispute, is that the strings of digits which represent numbers in the **National Numbering Scheme** are a national resource. Furthermore, the fundament mechanisms which allow them to be used to make telephone calls through the national telecoms network should be considered in the same way.

Notwithstanding the essential demands of practicality and efficiency, control of any element of this national resource should not be passed to operators, who may, quite naturally, exploit such control for the sake of commercial benefit.

We urge **Ofcom** to bear this principle in mind as these matters move forward and we will comment in detail on further proposals that are made, based on this principle. We note that the constraints imposed by the PSTN, which will remain in place for some time, have necessitated the passing of this control. That does not however provide a justification for allowing undesirable, albeit once necessary, effects to continue.

Other anomalies in the National Numbering Plan

No reference is made to use of the ranges 055 (Corporate Numbers) and 056 (Location Independent Electronic Communications Service) in the consultation.

It was understood that these would be addressed, along with 070 and 076, subsequent to completion of the UK Calling project.

In the absence of detailed information about their current and intended future usage, it is difficult to offer informed comment. The principle of predictable call cost must however apply.

Answers to Consultation Questions

Where relevant, the following answers refer to comments made above.

2.1 We have set out developments in voice telephone services that are important in shaping our review of the future use of numbers to promote consumer confidence. Do you agree that these are the key considerations? Do you have any comments on our analysis of these developments? Are there any other developments or considerations that should be part of shaping this review, and if so, in what way?

We are generally in agreement with the points made in Section 2. Specific points follow.

Our comments on Using numbers "to identify calling parties", highlight the absurdity of the notion that the form or content of an unrecognised number can be of any real value when deciding whether or not to answer a call. The value of CLI (as a string of digits) is commonly overstated.

If a number is recognised, then there may be value if there could be some degree of assurance that it is being used genuinely. An unrecognised number (assured or not) or a call with CLI withheld will always present the intended recipient with the need to identify the caller only after answering the call.

Whilst there may be some people who are unwilling to answer a call unless they recognise the caller, such a practice should never be recommended as the only way of avoiding the danger of answering unwanted calls. There is no way that the structure of the **National Numbering Plan** can make any worthwhile contribution to the necessary battle against Nuisance and Scam calls.

It must be acknowledged that some developments in the **National Numbering Plan** were possibly ill-conceived, or are now seen to be redundant. The particular ranges in question are 070, 076, 084 and 087. In all cases there remains no justification for their use in their present form. This is covered by our comments - Predictable call costs, which address other issues.

We comment at length in the section on Use of the 084 and 087 ranges and in responses to specific questions below. We also comment on Other anomalies in the National Number Plan.

Section 3

3.1 What are your thoughts on the ability to dial local numbers from a landline without the area code? Do you think the local dialling facility has value?

One suspects that the extent to which this facility is utilised is diminishing.

As stated in our comments - "Local" numbers and abbreviated dialling - there is a need to conduct research on the value which this ability actually delivers.

Our proposal of an automatic prefixing facility goes beyond the scope of **local dialling**, as such. It addresses the ability to dial numbers from a landline without dialling an area code, whatever specific prefix may be desired by the customer. It is however focussed on addressing whatever demand there may for the present "**local dialling**" facility.

3.2 Do you think local dialling should be closed on an area by area basis as required to increase number supply or across the whole of the UK at the same time? Why do you think this?

If a facility such as that outlined in our automatic prefixing proposal were to be introduced, this could allow flexibility in the date on which **local dialling** is removed as a regulated feature.

If the issue of number supply creates an immediate need to close **local dialling** for any particular area, then this must go ahead. Otherwise, and in general, a single cut off date is the sensible option.

(See also the comments in the following responses.)

3.3 Do you have any views on allowing telecoms providers to make individual decisions on whether to provide customers with the ability to dial local numbers from a landline without the area code?

Our view is that the facility of "**local dialling**", as it stands, should be halted.

We believe that the ability to undertake abbreviated dialling should be provided in a different way, see automatic prefixing.

3.4 For telecoms providers, what are your thoughts on the ability to implement the closing of local dialling in all UK area codes simultaneously?

There would be merit in announcing a single date for the beginning of switching over to national-only dialling, helped by provision of an automatic prefixing facility.

This could be followed by a date on which **local dialling** was (at least supposedly) prohibited. The actual closing of **local dialling** could occur at any time after this, but before the date of the cut-over to IP-only.

3.5 For telecoms providers, what are your views on the technical feasibility of providing local dialling to customers when offering an IP-based voice service?

Our automatic prefixing proposal sidesteps the specific issue.

3.6 What do you consider are the important factors about geographic numbers? For example, is it the information they provide about the caller/called party? Is it familiarity, trust or confidence in call cost?

As stated in Using numbers "to identify calling parties", we firmly discourage use of unrecognised CLI for the purpose of identifying the caller in any way.

A published geographical number may give a clue as to the location of the person / business being called, but even then it should potentially be treated with suspicion. The distinction between a land-based and mobile number could be seen to be of value in determining the likely availability of the person being called, but greater flexibility and availability of call diversion helps to make this irrelevant.

Confidence in call cost, and the consequent ability to present tariffs in simple terms, is a (probably, the) most important factor. It is therefore essential that the **National Numbering Plan** is constructed in such a way as to ensure this confidence, primarily from the first two digits of the number, e.g. 01/02.

3.7 What are your thoughts on retaining area codes in geographic numbers? Do you think location significance in geographic numbers has value and should be preserved? If so, why? How might your view change over time?

Without a mass switch of numbers (an unrealistic idea), area codes will be seen as remaining significant for a long time, even if it is formally announced that they are not. History shows that perception of change takes a very long time to bed in.

For example, the distinction between 020 7xxx and 020 8xxx is still seen as being significant, as if area codes 0207 and 0208 directly replaced 0171 and 0181, which they did not. Numbers beginning 03xx are still widely treated with unwarranted suspicion.

Whatever is determined as policy, location significance will be seen to remain. The only way to avoid this would be to adopt the absurd policy of changing every geographic number onto a new non-geographic scheme.

There would be merit in issuing new numbers using existing "area codes" and applying the current location significance. If "residential" numbers are to be offered (perhaps on request) with no location significance, a new block in the 03 range could be assigned for this purpose – retaining 01 and 02 as geographic, and the present 03 blocks as business, in two categories; public sector and charity (030) vs private sector (033), also the migration ranges (034 and 037).

There would seem to be no good reason to interfere with present "out of area" arrangements, for either existing or new numbers. Given the desire to retain location significance, some degree of constraint would probably need to be applied – although this could be tricky!

Over time, the exhaustion of available numbers will present the challenge of whether to attempt to preserve location significance or not.

There is clearly no purpose in making changes to existing numbers, as could have been case previously when expanding an area code.

Assigning a secondary range to a location (not necessarily the same as an existing area) with a 01 or 02 prefix would probably make sense. The present scheme demands that area codes cover discrete locations. Location significance does not necessarily demand this. For example, demand to extend the scope of numbers available for a particular area could be covered by area codes assigned to each geographical county, e.g. 02*nnn* (Devon, expansion).

Research is undoubtedly required to establish a sense of the public view on this point. We would expect a high level of support for fully retaining the concept of location significance. It is however important to note that it will remain anyway.

There would seem to be little point in testing public opinion on the idea of changing every existing landline number onto a new scheme.

Whilst location significance is no longer demanded, our strong feeling is that consumers will have enough issues to take on board with the switch to IP and the necessary cleaning up that will accompany it. Given that the perception of location significance will remain, reasonable efforts to maintain its, already limited, integrity are surely worthwhile.

Section 4

4.1 What are your thoughts about 084 and 087 numbers? What are the benefits and/or disadvantages of contacting an organisation by calling an 084 or 087 number? Can you tell us of any experience you've had calling these numbers? Have you expressly chosen not to call a service that uses these numbers? If so, what led to that decision and how did you choose to make contact instead (if you did)?

Our thoughts are outlined in the section Use of the 084 and 087 ranges. We urge Ofcom to immediately encourage natural migration to other ranges, with closure to follow.

A common experience is that Service Providers are not fully aware of the implication of their use of 084 / 087 numbers. It is commonly not recognised that in almost all cases the "Access Charge" is (often most significantly) greater than the "Service Charge". Whilst Service Providers carry no direct responsibility for the level of "Access Charge" incurred in any particular case, they are responsible for the impact of their decision to use a 084/087 number on their callers. That impact includes the significant cost of the "Access Charge".

We would greatly appreciate assistance from **Ofcom** in helping to press this point – out of its duty to those Service Providers. The title of our briefing - The 'insanity' of using 084 or 087 numbers - may be overstating the point, but not by much, and the detail is correct.

4.2 We are interested in hearing from people who use 084 or 087 numbers as a contact telephone number. If you use one of these types of numbers as a means of contacting your service, why did you choose to do so? What do you think about using these numbers in the future?

Service Providers may be likely to could refer to false or misleading information provided by their telephone service providers. This may relate to the likely costs to be incurred by callers.

We have encountered many cases where Service Providers were even unaware that the full benefit of the Service Charge was derived by their provider. In some cases it seemed that none of this benefit was being passed on, either through revenue share or in any other recognisable form. *(Those with the greatest lack of understanding are however unlikely to respond.)*

4.3 For telecoms providers, we are interested in hearing from providers that offer services on 084 and 087 numbers to their customers. If you do, can you provide some examples of use cases? What benefits do you offer to organisations in using 084 and 087 numbers rather than other numbering options? For originating providers, do you have any customer experience of attitudes towards and views on calling 084 and 087 numbers that you can share?

Whilst the measures introduced under the **UK Calling** project have helped enormously there is still a lot of misunderstanding around who benefits from the higher costs. The passing of blame between the parties cannot be as great as it was under the previous regime, but it has not been entirely eliminated.

We will be especially keen to read the response from BT, explaining why it includes calls to the ranges on which it is the leading provider (0845 and 0870) in its Calling Plans. We believe that this improperly inflates the cost of its calling plans and serves to distort understanding of the nature of 084 and 087 numbers.

Our one significant disagreement with **Ofcom** over the **UK Calling** project (which we generally laud in the strongest terms) was its yielding to pressure from BT, by reversing its position on the issue of inclusion and permitting this nonsense.

4.4 Are there changes to 084 and 087 number ranges that you think Ofcom should consider proposing to address the concerns highlighted in the research summarised in paragraphs 4.17 to 4.26?

Given the appalling mess which existed previously, the measures introduced through the **UK Calling** project must be seen as the right step in the right direction, despite noting the limits of its effectiveness in achieving recognition.

We sought to work with **Ofcom** in achieving extensive media coverage of the switch on 1 July 2014. We did not achieve as much as we had hoped for.

It is clear that advice and promotion of the level of the premium rate "Access Charge" by telephone service providers has fallen well short of what was necessary. An essential requirement for the call charge promotion demanded of Service Providers was that the phrase "***your phone company's 'Access Charge'***" would have real meaning.

We have always believed that the current use of the 084 and 087 ranges must come to an end. The question is "When?".

It is fair to say that the measures adopted through the **UK Calling** project were not intended to encourage their well-understood continued use, but rather to bring home the reality of something which must be seen to be unsustainable. It is however primarily for users to recognise this and, as is appropriate in almost all cases, avail themselves of the excellent opportunity to migrate to equivalent 034 and 037 numbers.

For cases where it may be justified to recover something approaching the full cost of an agent handling a telephone call, a move to a 09 number with a Service Charge of at least £1 per minute must be the appropriate course to take. It makes no sense for someone to recover the cost of dealing with an incoming call at a rate no greater than 10.83 pence per minute.

Our proposal, clearly outlined at Use of the 084 and 087 ranges is for a serious campaign (in concert with the **fair telecoms campaign**) to encourage existing users of 084 and 087 numbers to seriously consider their situation and migrate to another range – the equivalent 034 / 037 number in most cases.

It would be hoped that such a campaign would diminish use of these ranges considerably.

The intention would be for the "new" **National Numbering Plan** to exclude these ranges. In other words, those who failed to respond to the sensible arguments advanced in the campaign referred to would be compelled to move to numbers in another range.

If there continues to be any demand for Service Charges at a level of 7p per minute (including VAT) or less, then these would have to be classified as being used for **Premium Rate Services** and available only on the 09 ranges. One struggles to understand why any such demand could exist, given the levels of "Access Charge". ***(Now being raised to 65p per minute by* EE*!)***

One also struggles to understand any considered demand for Service Charges at the level of 13p per minute (including VAT) or less. One notes that these services are already classified as **PRS**, but it is hard to see any particular distinction between 084 and 087. Under a clarified and rationalised **National Numbering Plan**, clearly all **PRS** 'numbers' should be in the 09 range.