

Ofcom PRS numbering consultation, April 2004

The notes below are a personal contribution to this consultation. PRS numbering is a subject of which I have more experience than you could wish on anyone (acquired both as a numbering expert and as a former member of the ICSTIS Committee).

1. There is a considerable risk that the current consultation will mainly attract supportive industry responses. As a result, far-reaching decisions on the numbering plan could be made which are not in the long-term public interest.
2. The CD has a short-term focus which should be complemented by longer-term reviews of both:
 - consumer needs/preferences (to be included in the USO review later this year, as selective call-barring is one of the protections mentioned in the US Directive?)
 - and a more strategic look at overall use and development of the national numbering plan.
3. Any reduction in numbering structure is irreversible, so it's important to be sure that it's the right thing to do before doing it.
4. Given the above, the sensible course of action at present is probably to open another 090x sub-range (0902 or 0903) to meet immediate pressures, and consult again within a year on a longer-term course of action, after more study/research and fuller consultation (see below).
5. The research quoted in this CD is already nearly two years old. Important new developments since it was done include increased Internet use (and nuisance from unwanted downloaded diallers), and an explosion in premium rate SMS. More research, or at least a more digestible and higher-profile consultation getting significant consumer responses, are needed before taking irreversible decisions.
6. Low levels of recognition of the meaning of 090x are only to be expected, since the numbering arrangements haven't been publicised either by the industry (who have no incentive to publicise them) or by Oftel/Ofcom (who think that publicity is the industry's job – though they are reviewing this stance following criticism by the NAO and PAC).
7. Similarly, low takeup of selective call barring is only to be expected since there is very little on offer, and what there is, is often charged for at such a level that most people would find it cheaper to pay for the occasional unwanted call.
8. Therefore, it would be wrong to draw conclusions about the numbering substructure on the basis of current low awareness. This could be changed, given the will and the funding. But obviously there are limitations on how much information in numbers

people can use or remember. Oftel/Ofcom has never really got to grips with what is known on this subject.

9. An interesting related question is whether the rest of the 09 range (092 to 099) can reasonably be used for anything other than expensive calls, if people are trained to associate 090 and 091 with expensive calls.
10. The root of the problem is tariff proliferation, together with the industry's insistence that number analysis for tariff determination can only look at the first 5 significant digits (ie in blocks of 100,000 numbers). There is no shortage of premium rate numbers, but each 090x range only provides 100 100,000 number blocks. As long as Ofcom feel they must provide a new 100,000 block for every slight variation in tariff, pressure on 09 will continue; it will be much worse if (long expected) higher rate PRS come in, with price competition – so we might get a demand for new blocks for (say) £5 a minute, £4.99 a minute, £4.95 a minute....and so on.
11. The shortage of tariff blocks is the reason that the CD suggests that services priced at under 10p a minute should not be put on 090 – it's not for consumer protection reasons.
12. To enable readers to assess this situation properly, the CD should have included an estimate of the network investment that would be needed for tariff determination to take place at the 10,000 block level or below. A few years ago there was a lot of talk about individual number allocation, which if implemented for premium rate services would naturally go with tariffing at the individual number level. This seems to have got submerged in the new wave of plans for IP networks – but it could re-emerge as soon as increased intelligent network capability appears.
13. More variation in tariffs strengthens the case for tariff indications which are built into the service (eg voice messages during call set-up, or during a free or low-charged initial period after answer).
14. Aligning Ofcom and ICSTIS definitions of PRS sounds desirable but won't be straightforward. Complications include: the content/non-content distinction; international PRS; DQ on 118xxx; services provided to mobiles using short codes.
15. Mid-call tariff changes are another complication (eg a call might start on an 0845 number at 3p a minute, then change during the call to another service at 30p a minute).

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