

Communications Consumer Panel and ACOD response to Ofcom's consultation on promoting efficient use of geographic telephone numbers

The Communications Consumer Panel (the Panel) and the Advisory Committee on Older and Disabled People (ACOD) welcome the opportunity to comment on Ofcom's proposals to promote efficient use of geographic telephone numbers.

The Panel works to protect and promote people's interests in the communications sector, including the postal sector. We are an independent statutory body set up under the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, governments, the EU, industry and others to look at issues through the eyes of consumers, citizens and micro businesses.

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues. Following the alignment of ACOD with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

Response

We note that this consultation is about the review of the pilot scheme to charge communications providers (CPs) for certain geographic numbers, including proposals to modify General Condition 17 and its effect on the efficient use of geographic numbers.

The consultation document states that proposals for a charging scheme, in themselves, do not affect consumers' use of numbers or our policy on how numbers may be used. However, the consultation document also highlights the fact that numbers need to be used efficiently, "with the aim of delaying or avoiding the need for measures to increase the supply of numbers, which are costly and disruptive for consumers, businesses and the telecoms industry". We would like to emphasize this indirect impact on consumers. We believe it is vital that Ofcom considers the following and takes preventative action for and on behalf of consumers, where necessary:

We welcome Ofcom's consideration of unintended consequences and negative impacts of charging on consumers. Although at a low level, we consider that the charges imposed on CPs following this review should not be passed on to consumers. There should be no unjustified financial enrichment; and

Although we recognise that policies are in the hands of the individual providers, we believe that Ofcom should help to ensure that CPs operate consumer-friendly number recycling policies, protecting consumers from the distress caused by inheriting nuisance calls or calls from debt collection agencies intended for the previous holder of the number.

We note Ofcom's conclusion that overall, it believes that these proposals would benefit consumers by delaying the point in time when the UK runs out of number blocks in any given area, postponing the need for number supply measures which its research has shown that consumers dislike.