



Communications Consumer Panel and ACOD response to Ofcom's consultation on clarifying how mobile numbers can be used by Communications Providers

The Communications Consumer Panel (the Panel) and the Advisory Committee for Older and Disabled People (ACOD) welcome the opportunity to respond to Ofcom's consultation on clarifying how mobile numbers can be used by Communications Providers (CPs).

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 microbusinesses.

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

The Panel welcomes Ofcom's proposals to address potential harm to consumers using mobile and fixed networks, by simplifying the way CPs can use '07' or 'mobile' numbers. We agree with the types of harm set out in the consultation document and support Ofcom's intention to make it easier for consumers to understand the prices they are likely to pay when using 07 numbers, by removing international call forwarding and conference calling services from the '07' designation.

We believe it would be reasonable to assume that most consumers are not aware of the designations and requirements under Ofcom's National Telephone Numbering Plan (NTNP) and may believe that all '07' numbers (within the 071-075 and 077-079 ranges) would only be assigned to a mobile phone handset, or another piece of equipment designed for use on the move.

As explained in the consultation document, consumers may thus reasonably consider that calls to all '07' numbers would be priced within their bundled minutes and would be shocked to find that some calls to numbers within that range were priced differently. International call forwarding services and conference calling are not - we agree - intuitively 'mobile services'. The additional element of detriment - that use of such services is restricted to mobile-only consumers (excluding those using fixed networks) purely to comply with the current restrictions under the NTNP - is unjustifiably

detrimental to fixed line users. This also means that consumers who are reliant on landline services as a back-up, such as those living and working in rural areas, may be further impacted by not being able to use these services. The changes proposed appear logical and helpful to consumers, both in addressing confusion regarding pricing and in removing barriers to services. On the basis of the reasoning set out in the consultation document, it would seem reasonable to include 07624 in the changes.

The proposed redefinition of 'mobile services' in the NTNP appears timely and reasonable. The consultation document suggests that most CPs affected by the need to migrate to other number ranges will already be in the process of doing so, by the deadline of 1 April 2018, as a result of the 2017 Mobile Call Termination Market Review 2015. As well as synchronising with the recommendations from that Review, we note that the new definition of 'mobile services' to be included in the NTNP will align with the definition used in Ofcom's revised General Conditions (September 2017). We welcome this consistency. This should make it easier for CPs to understand numbering designations and requirements and we hope this will make unintentional non-compliance less likely, which will also benefit consumers.