

Consumer Panel: advice to Ofcom



Title of Ofcom Project:	NTS Options for the Future
Date:	9 December 2005
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Paper no.	AO/9

1. We welcome the opportunity to respond to the Ofcom consultation, NTS Options for the Future. Also, we have appreciated the engagement with Ofcom on its NTS Policy over the past two years.

Price Transparency

2. Throughout this time we have consistently called for 'price transparency' to be at the heart of Ofcom's NTS policy. Ofcom's own research reveals that the majority of consumers have no idea as to what an NTS call actually costs. Ofcom's policy must deliver an environment which provides clear information to consumers in regards to costs thus ensuring informed choices can be made.
3. We have previously said to Ofcom and still think that call pre-announcements on all NTS numbers should be part of Ofcom policy and thinking. Call pre-announcements would ensure NTS price transparency. We believe that Ofcom's cost benefit review of call pre-announcements rests on analysis that has only quantified the costs to industry and not the cost to consumers. We think that this analysis has not been fully worked through and needs to be revisited.
4. We think that the restoration of the geographic link to the 0870 number should occur without any 'get out' options. We note that Ofcom has said that an Originating Communications Provider (OCP) can charge on the 0870 number if it wishes but if it does so it must use a call pre-announcement which will state what the cost of the call will be. Yet Ofcom believes that the cost to an OCP in using a call pre-announcement service will deter OCPs from charging on this number. If this is the case then we do not understand why this policy proposal has been put forward. We think a clear policy guideline must be established for the benefit of consumers and business.
5. We agree that it is anachronistic in today's communications market to fix NTS call prices to a BT line and that the change will benefit consumers by promoting price transparency.

Locked-in Consumers

6. We think it is inappropriate to use a revenue sharing number when a consumer is locked into using a particular number. Ofcom's own research reveals that 40-50%

of the calls by consumers to 084 and 087 numbers are 'locked in' calls. This is an increasing concern because we note that it is becoming rarer for a service to exist that would otherwise not be provided by a company if a revenue sharing number was not used. This is in direct contrast for the need, for example, of a revenue sharing number for the dial-up internet business model.

Restoring the geographic link to the 08 number range

7. We understand that Ofcom will review the 0845 and 0844 number range in two years time but for consumers to have a clear understanding of the cost and of the number ranges it seems sensible for Ofcom to re-establish the geographic link to the 08 number range (including the 0871 number) sooner rather than later and to move all revenue sharing numbers to the 09 number range.

ICSTIS and funding

8. The consultation fails to explain how ICSTIS will be resourced or resourced effectively so that it can undertake the proposed extra workload. We have previously told Ofcom and still believe that more consideration needs to be given to what resources ICSTIS will need to meet the challenges ahead.

Public bodies and their use of revenue sharing numbers

9. It is inappropriate for public bodies to use revenue sharing numbers (e.g. GP surgeries) - as do the public at large. We understand that Ofcom has limited powers in this area and that it is working closely with the Central Office of Information (COI) to ensure government guidelines on NTS numbers are followed by public bodies. But we think Ofcom can better utilise suasion to ensure progress on this front is made. And for example, to ensure that the use of an NTS number for the London bombings helpline does not reoccur.