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## **Consumer Panel observations on Ofcom Numbering Strategy**

1. Consumer Panel members have asked me to write to you on their behalf to outline their immediate reactions to the strategy paper you and colleagues presented at the Panel meeting on 10 June.
2. There are some points of detail that I will go into but the Panel wanted me first of all to stress that they welcomed the development of the strategy paper and that they were pleased to see a comprehensive route map for numbering emerging. Of particular interest was the inclusion of a section on public information and communications. As you will appreciate, the Panel holds dear the principle that making available appropriate consumer information is paramount for consumers to make informed decisions. Section 2 of the document is therefore a key area of interest and one where they will be keeping a watching eye – particularly as work moves from the development stage to delivery.
3. Turning to the specific points the Panel raised in discussion:

### Benchmarking of consumer understanding

- a. In looking at the majority of specific projects in the numbering strategy document, the Panel believed a useful starting point would be to consider both current levels of understanding about telephone numbers and what a reasonable level of knowledge about numbering should be. The answers to these questions could, the Panel believes, provide a useful benchmark for informing policy decisions and be invaluable in establishing appropriate consumer information strategies. Having a base-line of knowledge would also make assessment of the impact of change and the success of consumer communication easier to determine. This must extend to the small business community as well as domestic consumers.

### Erosion of link between number and cost of call

- b. One inevitable consequence of a competitive market for calls, including the rise in mobile usage, is the erosion of the link between number and cost of call. This is of concern to the Panel and in developing any benchmark of consumer understanding, they would urge Ofcom to consider the full range of consumer calling options i.e. not just use of BT fixed-lines. Recognising that this link is unlikely to be regained, taking steps to ensure that consumers understand that call charges to particular prefixes depend very much on their own circumstances e.g. fixed or mobile, nature of tariff etc will be essential going forward.
- c. This will rely on operators providing accessible and up to date information on call charges to their customers. Whilst the Panel notes that Ofcom numbering policy is independent of operators' charging policies, there may be a role for the regulator in ensuring

such provision takes place in a timely and helpful manner. Equally, the decision on whether or not any broader, brand-neutral, communications piece about numbering and variable cost can be successfully left to the industry will have to be carefully thought through.

#### Northern Ireland issues

- d. Kevin McLaughlin, the Panel's member for Northern Ireland, was particularly interested in the issue raised in the strategy document at para. 65 a) and b) in relation to the introduction of a non-international dialling code for the Republic and roaming charges. His anecdotal experience suggests that this is major issue for Northern Ireland consumers – contrary to the paper's assertion. Research and discussion with Northern Ireland colleagues and committee members would seem a sensible first step to establish the true nature of problems and concerns. With this in mind, the Panel is encouraged by Ofcom's plans to set up a specific project to look at Northern Ireland's numbering issues.

#### VoIP impact on numbering policy

- e. Several Panel members expressed the view that the impact of widespread adoption of VoIP technology would have significant implications for numbering policy – potentially making traditional numbering less useful if consumers move to some form of internet address system for calls. The Panel does recognise that the regulation of IP addresses is outside of Ofcom's remit but it does feel that monitoring of developments would be helpful.

#### Ofcom Numbering Forum

- f. The question of whether it is appropriate for a Consumer Panel member to be a member of the Forum will need to be considered by the Panel. In the interim, the Panel agreed that liaison on numbering issues should be via myself.
4. Finally, two generic points. Firstly, the Panel made the point that support for change is more likely to be achieved where there is a broad acceptance that the requirement for change is real. This suggests the addition of "logical and understandable" to the list at paragraph 20 would be helpful. Secondly, an additional point on consumer information – as well as considering the appropriateness and adequacy of consumer information, it is equally important that attention is paid to timeliness of provision. Timescales must be long enough to allow messages to reach and be absorbed by affected consumers
  5. The Panel hopes these comments will help the strategy development process and would welcome regular updates on both the strategy and specific projects as they progress.