



**Mobile Broadband Group  
PO Box 34586, London SE15 5YA**

20<sup>th</sup> December 2005

Elizabeth Greenberg  
Competition Group  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA

Dear Liz,

**National Single Non-Emergency Number: proposals for number and tariff**

The Mobile Broadband Group ("MBG", whose members are O2, Orange, T-Mobile, Virgin Mobile, Vodafone and 3) welcome the opportunity to respond to Ofcom's consultation on the National Single Non-Emergency Number.

**The number**

Three digit numbers are a very scarce resource and Ofcom is absolutely right to give careful consideration as to whether a three digit number should be allocated for this purpose and, having concluded that it should, to decide the most appropriate number to use. The MBG agrees that it is justified to allocate a three digit number and that the most appropriate number is 101, on the grounds that it is memorable, has a low risk of misdial and easy to navigate for the blind and partially sighted.

We note that this will be put into effect by adding the number to the list of designated service numbers in General Condition 17 of the General Conditions of Entitlement.

**The tariff**

The MBG notes that the section on tariff options is set out on behalf of the Home Office and that no regulatory intervention is proposed by Ofcom. Each mobile operator will be discussing with the Home Office what charging arrangements they will put in place for calling 101. We also note the Home Office's desire to have a price per call model and its intention to move to a free call. If they are paying originating network providers to deliver calls, that is their choice. Nevertheless, we believe that it would be very much better to discourage frivolous calls by levying a charge.

Ofcom's research (paragraph 5.14) also highlighted that the most popular tariff option was based on a per minute charge rather than a per call charge. Judging by the

responses already received to this consultation, consumers are more comfortable with the idea of per minute charging. This is a very important factor for the Home Office to consider when finalising the pricing strategy. Pricing transparency can be achieved with per minute charging and it also encourages all parties to use communications resources efficiently.

### **General Condition**

The MBG believes it is unnecessary for Ofcom to impose a 'must carry' obligation and that it may even introduce unwarranted delay. There is no time to change the General Condition and simultaneously meet the project milestones. Furthermore, as 999 is not even a 'must carry' number for VOIP providers, it would seem strange to mandate 101 on all providers first (or discriminatory just to impose it on the non-VOIP providers). The mobile operators are already engaged with the Home Office on the SNEN. Although there are a number of technical, legal and logistical issues to address and the time scales envisaged are very challenging, the project is being implemented on a co-operative basis.

If there any questions about the content of this response, please do not hesitate to contact me.

Yours sincerely,

*Hamish MacLeod*

Hamish MacLeod  
Mobile Broadband Group