



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

29th June 2007

Mr Warwick Izzard
Ofcom
2a Riverside House
Southwark Bridge Road
London SE1 9HA

Dear Warwick

Consumer protection test for telephone number allocation

The Mobile Broadband Group ("MBG", whose members are O2, Orange, T-Mobile, Vodafone, Virgin Mobile and 3) welcomes the opportunity to respond to Ofcom's consultation on the 'consumer protection test for telephone number allocation'.

The MBG fully supports Ofcom's overall policy aim of ensuring that telephone numbers, which are a scarce resource, are used appropriately in order to safeguard and improve transparency for customers. It is important both to have clear service definitions in the Numbering Plan (we look forward to Ofcom's consultation on this later in the year) and for Ofcom to ensure these are adhered to in order to avoid customer confusion. The MBG has been concerned for some time about the lack of checks over the number allocation process (including after numbers have been allocated), which has on occasion led to consumers misunderstanding the meaning of numbers. The MBG is thus supportive of Ofcom's proposal for making it much harder for repeat offenders to acquire number allocations from Ofcom.

We note that it is Ofcom's intention to apply the test solely to 070, 08 and 09 ranges on the grounds that it is within these number ranges where problems have occurred in the past. We fully support Ofcom's conclusion that mobile short codes are already subject to effective self-regulation and are thus out of scope of this consultation. We also note that, by operating a proscribed list, the administrative burden on Ofcom and providers will be proportionate.

With respect to the period that individuals or organisations spend on the 'Refusal List', the MBG supports Ofcom's preference for a minimum period of six months, followed by a period that is proportionate to the offence. We have no strong views as to whether the list should be in the public domain but are also inclined to support Ofcom's proposal that the information should be public.

In summary, the MBG has long advocated an allocation policy that does more to prevent abuse of the numbers and we look forward to the implementation of the consumer protection test.

Yours sincerely,

Hamish MacLeod

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