



Response to the Office of Communications consultation on Numbering arrangements for Voice over Broadband services on behalf of the 'Internet Telephony Service Providers Association'

About the Internet Telephony Service Providers Association

The Internet Telephony Service Providers Association ("ITSPA") represents a group of 13 UK companies, from Internet Service Providers (ISPs) and existing telecoms companies to new market entrants all of whom are interested in developing and supplying services using Voice over Internet Protocol ("VoIP") technology.

Internet Telephony is the next generation of Multi-Media and Telephony Services. The speed, flexibility and rich capabilities of the Internet, married with the global pervasiveness of the phone network, will transform the way we communicate. New Features such as international roaming of your phone number, CD audio quality, integrated video calls and the potential convergence between mobile and home/office telephony. There are already more than 6 million people worldwide benefiting from making voice calls over their Internet connection, primarily in Japan and the USA. It is ITSPA's view that the UK market is now poised to similarly take off.

Please note that the ITSPA response at this point in time is only in regard to the Ofcom proposal concerning the release of the 056 number range for Voice over Broadband ("VoB") . ITSPA will be making further, separate submissions at a later date on the other issues that have been raised by Ofcom in the context of this series of consultations.

Whilst ITSPA have provided positive comments on the non-geographic part of this consultation ITSPA are adamant that 056 (or similar) numbering cannot be seen as a replacement for geographic numbering which is essential for VoB services to succeed.

For the avoidance of doubt, ITSPA specifically reserves it's position in regard to the issue of allocation of geographic numbers for use by operators, service providers to supply to end customers who wish to use them in connection with VoB services. ITSPA does not concede that any acceptance of the proposals to release a non-geographic number range by Ofcom resolves other issues in regard to the provision of VoIP services with a number allocated from the UK National Number Scheme.

ITSPA and Voice over Broadband

ITSPA and its members firmly believe that over the next five to ten year period a significant percentage of consumers will receive all their 'information technology' services over a single bearer circuit, (including today's twisted copper pair, broadband connection and wireless links). This will include telephony as well as broadcast television, audio-visual and standard data services. ITSPA feel that it is vital that any decisions made now make adequate provision for future growth and innovation in this industry.

As an organisation, ITSPA believe that it is essential to remember that VoIP (and similar technologies) are ultimately a delivery mechanism and not a description of the

content or services. ITSPA feels the general principle of technological neutrality is particularly important in the cases of VoIP and VoB. VoB must therefore not be distinguished from existing technology when numbering issues are considered. This includes access to Freephone, Number Translation Schemes and Premium Services (i.e. 08s and 09s) for the provision of services via VoB.

ITSPA does accept there are a number of new applications which may not meet the criteria for allocation within existing available number ranges. ITSPA does not believe that the 056 number range has sufficient scope to meet the numbering demand of these new services. ITSPA propose that the 06x numbering range in whole or in part should be considered for introduction as a range dedicated to 'new technology services' under which an allocation could be made for Voice over Broadband services. ITSPA would consider 061 as a good starting point for geographic parity tariffing, and 068 for 'revenue generating' tariffs (comparable with existing arrangements in line with those in the 08 number ranges as they apply under NTS services)

ITSPA also believe that number portability is a key requirement. Whilst this can be handled in a traditional method via the standard BT Interconnect Agreement, for future planning, as well as general interconnection issues, ITSPA would like to see Ofcom supporting a public ENUM delegation of this range at the earliest opportunity.

In relation to interconnection arrangements for VoB services, ITSPA feel that it is imperative that the general principle of the pricing models for VoB are directly comparable with those currently in existence for geographic and NTS services. For example, Schedule 101 (and the appropriate reciprocal arrangements) of the BT interconnect Agreement is modified to provide for services provided by VoB service operators. This would mean in most instances that 'transit' costs must be the responsibility of the originating operator and not the terminating network. This then ensures that the terminating operator is not penalised for any lack of innovation and investment in technology by the originating operator.

This response has been produced on behalf of the ITSPA and the following ITSPA Members;

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Gradwell dot com	http://www.gradwell.com/
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Imass Telecom	http://www.imasstelecom.com/
Intervivo	http://www.intervivo.net/
Magrathea	http://www.magrathea-telecom.co.uk/
Mistral Internet	http://www.mistral.net/
Speak2World	http://www.speak2world.com/
Telappliant	http://www.telappliant.com/
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Response to Ofcom specific questions

Please note that ITSPA will be responding to 9 and 11-14 in a separate submission. We address all other specific questions asked by Ofcom in the comments below.

Question 1: Ofcom believes that non-geographic numbers would be suitable for VoB services. Do you agree?

ITSPA agrees with Ofcom in so far as that there are applications of VoB technology that could require non-geographic numbers which do not fit easily into existing available ranges under the National Number Plan. ITSPA would disagree with Ofcom's current position that a single number range (056) specific to VoB will appropriately and/or universally supports all of these services. Given that there are a series of number ranges currently open and available and the numbering plan is based on providing an indication of the service a telephone user is calling, it is our view that it would be appropriate for VoB services which fall outside existing arrangements (i.e. personal numbering in the case of non fixed location services, geographic numbering in the case of residential connections) to be put into a new, non-geographic number range.

Should Ofcom believe that additional numbering capacity is required in the national scheme as a result of an inspected increase in demand for services as a result of the introduction of VoB then we would suggest an assessment as to what end user service is expected and allocate number ranges accordingly.

Question 2: Ofcom's provisional view is that none of the non-geographic number ranges currently determined for allocation fully meet the requirements of VoB services. Do you agree?

ITSPA disagrees with the suggestion that available number ranges do not currently meet the numbering requirements of VoB services. ITSPA sees the Ofcom proposals to allocate a number range on the basis of technology specific criteria view as being based, where the use of that technology can easily fit into existing number ranges. In our view the allocation of a specific number range on the basis of conveyance technology would entail Ofcom ignoring several obligations specified under Sections 3 and 4 of the Communications Act 2003. It would also ignore the fact that VoB services can be divided between geographical fixed services (i.e. services to residential consumers), geographically independent services (i.e. personalised or virtual network services) and Number Translation Services ("NTS"). ITSPA also holds the view that allocating a number range on the basis of technology in this case would be contrary to it's obligations under Section 4 (6) – (8) inclusive. ITSPA believe all of the current non-geographic (and geographic) ranges can be suitable for appropriate VoB services as VoB should not be considered separately from copper or existing mobile services.

ITSPA recognises that the introduction of new services on existing non-geographic number ranges could increase a risk of number exhaustion. However, in the absence of any indication of the level of demand for numbers across all ranges as a result of the introduction of VoB services, we do not regard this concern adequately demonstrated or being immediate. ITSPA would also note that Ofcom are only proposing to release a single number range to address demand issues with one set of tariff criteria to be charged on a geographic basis. ITSPA is in the process of agreeing proposals that it expects to present to Ofcom in regard to numbering allocation issues.

Question 3: Do you agree with Ofcom's proposal to make 056 numbers available as a dedicated non-geographic number range for VoB services and why?

Whilst ITSPA accept the principle that a number range can be made specifically available for new services which are currently unique to VoB, as stated above, ITSPA believe that the 06 number range should be opened for all non geographic and non-location specific 'new technology' services, with an initial allocation of 061 or similar for VoB numbering. ITSPA reiterate our position that all numbering should be available for appropriate use with VoIP technology.

ITSPA believes that the benefits for 06 (in comparison to 056) include:

- The allocation of a top level number range ensures sufficient capacity for the predicted substantial take up of new broadband services;
- The risk of consumer confusion with legacy or corporate services is greatly reduced with a benefit of being able to copy basic principles from the Number Plan and the 08 range in particular;
- The risk of renumbering in the future and associated confusion and costs becoming necessary is minimised;

A first level number range allows sufficient space for expansion over a substantial period of time and allows for innovation of VoB and other new technology services (e.g. including multiple tariffs, free on net calling, ENUM).

Question 4: Ofcom has not proposed a substructure for the 056 number range. Do you agree that one should be imposed and if so, on what basis and for what advantage?

ITSPA believe that the initial allocation must be reserved for allocation on the basis of direct parity on both the retail and interconnect level with existing fixed line geographic termination rates. ITSPA also suggest that with the adoption of the 0X range then an additional reservation should be made of the 0X8 category for NTS/revenue generating tariffs. Any further reservations should be made the subject of future consultations

In all cases it is vital to the industry where numbers are deemed as revenue generating for the terminating operator within these ranges that the interconnect principles applied are those of Number Translation Services in regard to NTS Call Origination. This will ensure the possibility for operators of value add services under these number ranges to have sustainable business models.

Question 5: Ofcom suggests that the 056 range should have a tariff ceiling of no higher than 5ppm. What are your views on setting a tariff ceiling for 056 numbers at this level?

As above ITSPA believe that the initial allocation must be in direct parity with geographic tariffs. ITSPA suggest that for the additional proposed 0X8 range then it should share as many characteristics as possible with the existing 08 range. Any other tariffs should be the subject of future consultations.

Question 6: Ofcom suggests that fixed and mobile Communication Providers should consider treating 056 numbers like geographic numbers in terms of retail pricing and inclusion in calling option schemes. Do you agree that this would be a desirable approach?

Not only does ITSPA feel that this is desirable and vital to the basic business model supporting the introduction of VoB, but ITSPA believe that this is essential to the success of the number range. However, ITSPA believe that this cannot be obtained without Ofcom requiring and enforcing a suitable amendment of the standard BT Interconnect Agreements to create parity of inter operator (and specifically BT to OLO) interconnect rates with geographic fixed line termination rates. Unless the cost base of calling these new ranges is similar to that of geographic numbers it would not be commercially viable for originating network operators to offer retail rates similar to geographic numbers.

Question 7: Ofcom proposed to designate the 056 range as 'Voice over Broadband services'. Do you have any comment on this designation for example with respect to technology?

ITSPA believe VoB numbering should exist within the existing allocated ranges currently available, including geographic number ranges. Where that is not possible, ITSPA believe a number range should be allocated and designated for 'new technology services', ideally the top level range 06. Should this not be possible, all of the comments made in relation to 06 can be interpreted as applying to whichever range is allocated by Ofcom.

Question 8: Ofcom proposes to modify the Plan so that 056 numbers are available for allocation for VoB services and 055 numbers are available for allocation for corporate numbering services. Do you have any specific comment on the proposals to modify the Plan in this manner.

ITSPA refer you to our comments regarding 06x.

Question 10: Ofcom would be interested in hearing views from fixed and mobile Communication Providers as to how they might charge for calls to 056.

ITSPA refer to our answer to question 6. ITSPA would hope that by Ofcom enabling fixed line termination parity for 056/06x numbering this will lay the groundwork and that with sufficient educational support from Ofcom all operators will treat this range appropriately. Without the enforcing of this parity, ITSPA feel that the vast majority of operators will not treat this range as geographic, and therefore will be tarified differently and not included in un-metered voice packages.

Question 15

ITSPA have no specific comments, but note that Ofcom has not allowed the selection of a tariff band as part of the allocation process. ITSPA believe that this is the correct approach as ITSPA feel that geographic rates should apply to all the initial numbering issued. This of course would not be suitable should Ofcom adopt our proposed 06X ranges.