



Internet Telephony Services Providers' Association

March 18th 2005

Conserving Geographic Numbers

About ITSPA

The Internet Telephony Services Providers' Association was established in 2004 to represent the voice of the VoIP sector. ITSPA aims not only to encourage the innovation and development of the VoIP industry through the promotion of self-regulation and competition, but also to promote the benefits of the technology to consumers. ITSPA has the objective of ensuring consumers receive a first-class service and to reassure them that any product or service bought from a company displaying the ITSPA logo comes with a high standard of consumer protection, which is properly policed and includes a dispute resolution procedure. Further information on ITSPA and its members, can be found on our website here: <http://www.itspa.org.uk>.

Introduction

ITSPA has highlighted in previous submissions on numbering issues that the availability of geographic numbers on a transparent, non-discriminatory basis to all communications service providers – be they traditional or new voice service providers – is crucial to ensuring a competitive communications market. Demand from communications providers for geographic numbers continues to rise as consumers prefer to have geographic telephone numbers for tariffing reasons and because they are more easily recognisable. Thus, ITSPA welcomes Ofcom's plans for short term number conservation to ensure an increasing demand for geographic numbers can continue to be met and we agree that the proposals represent the least disruptive regulatory mechanisms for numbering conservation in the short term.

Nevertheless, ITSPA would also like to stress the benefits of allocating numbers in blocks that are smaller than 1,000 in order to better meet providers' demands and reduce the amount of unused numbers within blocks in ranges that are already stretched. ITSPA does not believe that allocating numbers in smaller blocks as proposed by Ofcom will prove an unnecessary burden on providers in terms of routing.

ITSPA would also like to underscore that the promotion of number portability should also lie at the heart of conservation measures.

ITSPA acknowledges Ofcom's calls for quantitative data on requests for numbers in the areas cited in table 2 annex 7 of the consultation and will communicate any such information we may receive from our members on this topic to you.

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Size of number blocks

ITSPA supports Ofcom's plans for Type A and Type B conservation measures to be introduced in certain areas. ITSPA believes the allocation of smaller numbering blocks is not only necessary for conservation reasons, but also on a practical level as VoIP providers do not necessarily require to large blocks of numbers. Indeed, VoIP providers often only require numbers in blocks of 100s, or even 10s; however, in order to access these numbers, they must apply for 1k or indeed 10k numbering blocks (depending on the conservation status of the area).

In order to promote a better use of the numbering resource, ITSPA would propose to hold numbering blocks on behalf of the VoIP industry as a whole on a non-profit basis and to apportion these numbers fairly and reasonably. ITSPA would thus welcome discussions with Ofcom in the near future to assess how this proposal would fit in with the current number allocation structures and to discuss Ofcom's thoughts on such a scheme. ITSPA believes that this number block holding system would ensure numbers are assigned in blocks that are really needed and thus would assist Ofcom by reducing the number of applications for smaller numbering blocks that Ofcom would need to process.

Number portability

Efficient and competitively priced number portability could significantly help conserve geographic numbers. Our members have indicated that most of their customers wish to port their existing numbers. It is far less disruptive for consumers and businesses alike if they need not be assigned a new telephone number when they switch to a new voice service provider. Indeed, there is an increasing demand for number portability: for instance, it is estimated that in the United States, 50% of consumers are porting their numbers, with 80% doing so in Norway. ITSPA believes that by facilitating and promoting the availability of number portability, Ofcom would be helping to conserve geographic numbers by encouraging efficient use of numbers already being utilised. ITSPA thus urges Ofcom to ensure a more commercially viable model for numbering portability.

Although outside the scope of this consultation, ITSPA would like to reiterate its calls for a Central Database System for number portability to be implemented from the outset of 21CN (rather than an Onward Forwarding system, as is currently in use). The rollout of 21CN also offers a unique opportunity to ensure that routing at a lower level (e.g. at the 1K level) is possible.

Long-term strategic number conservation measures

ITSPA notes Ofcom's plans to produce a long-term strategic plan to conserve numbers later this year (including the consideration of measures such as Wide Area Codes etc). ITSPA believes that there may be a case for introducing wide area codes at some point in future, but any

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renumbering should be done on a systematic and potentially national basis. Wide Area Codes would allow for increased availability of numbers for new voice services. Moreover, geographic codes, such as 020, are more easily recognisable and understood by consumers, which is also beneficial to both the consumer and VoIP providers.

Conclusion

ITSPA agrees with Ofcom's short-term tactical measures for the conservation of numbers. We would like to reiterate the important role of number portability in contributing to geographic number conservation.

ITSPA would welcome further discussions with Ofcom with regards the options and opportunities for the allocation of numbering blocks to be administered by ITSPA, as we believe this could significantly assist Ofcom in its work to conserve geographic numbers by minimising the amount of unused numbers.