



Internet Telephony Services Providers' Association

ITSPA response to Ofcom's consultation surrounding

the 03 Number Range – revenue sharing

About ITSPA

The Internet Telephony Services Providers' Association (ITSPA) is the UK VoIP industry's trade body, representing over 80 UK businesses involved with the supply of VoIP and Unified Communication services to industry and residential customers within the UK. ITSPA pays close attention to the development of VoIP regulatory frameworks on a worldwide basis in order to ensure that the UK internet telephony industry is as competitive as it can be within international markets.

Please note that certain aspects of the ITSPA response may not necessarily be supported by all ITSPA members. Individual members may respond separately to this consultation where a position differs.

A full list of ITSPA members can be found at <http://www.itspa.org.uk/>

Summary

ITSPA members have concerns surrounding the proposal changes outlined by Ofcom within its 03 Number Range consultation paper. We agree the specific practices raised by Ofcom are unacceptable and we are keen to see this issue resolved, however ITSPA believes changes to the proposed remedy are necessary to avoid undesirable unintended market consequences.

The implementation of the Consumer Rights Directive has meant an acceleration in the take-up of numbers in 03 ranges and ITSPA members also anticipate a migration to them as a result of the introduction of the Unbundled Tariff; to that end ITSPA members would like to see Ofcom take enforcement action against alleged transgressors.

While ITSPA strongly supports the requirement to prevent all call payments by SPs to their Customers using 03 numbers, we believe Ofcom should clarify what it means by 'indirect payments' to avoid unintended consequences. In the situation where 03 numbers attract higher Terminating CP payments



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than those for 01 numbers, the Terminating CPs will take this into account when charging their SPs. For example, where a Customer changes from an 01 number to an 03 number, the higher Terminating CP payments means that the charge to the SP could be less than the charge for the equivalent service based on 01 numbers, which in turn could allow the SP to charge their Customer less. Is this deemed to be indirect revenue share? The words published by Ofcom need to address this specific problem whilst preserving the principle that neither of the parties at either end of the 03 value chain (the caller or the party being called) should profit from a call.