

## **BASIC DETAILS**

**Consultation title:** Personal Numbering

**To (Ofcom contact):** [ruth.gibson@ofcom.org.uk](mailto:ruth.gibson@ofcom.org.uk)

**Name of respondent:** Flextel

**Representing (self or organisation/s):** FlexTel Ltd

## **CONFIDENTIALITY**

**What do you want Ofcom to keep confidential?** Nothing

## **DECLARATION**

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and I authorise Ofcom to make use of the information in this response to meet its legal requirements.

Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom may publish this document on receipt.



William R Goodall BSc CEng FIEE  
Chairman & CEO  
**For and on behalf of FlexTel Ltd**

## Executive Summary

We thank Ofcom for the opportunity to comment on the **Proposed amendment to guidance on acceptable use of 070 numbers**<sup>1</sup>. This suggests extension of the Guideline<sup>2</sup> obligations to all Communications Providers (“CP”), including non-range holders using sub-allocations obtained from other CPs; our detailed response is summarised below.

## Our Response

1. In the current fully deregulated market, the Guidelines have proved both ineffective and unenforceable. In short, they restrict free market innovation and growth, whilst failing to protect consumers. They are a clear example of **excessive and ineffective micro-regulation** of the Market. Therefore, we strongly suggest they be deleted and replaced by recommendation 2 below.
2. Free markets only function well, when there is good price transparency. As we demonstrate later, the UK Telecom Market (and others worldwide) exhibits extreme price opacity. **Ofcom should initiate overarching market regulation and deliver price transparency in the telecom market.** Ofcom need only legislate for mandatory price labelling, for all calls, at the caller's discretion.
3. We propose that every Originating CP (“OCP<sup>3</sup>”) be made to deliver accurate price announcements for any call originated on their network. The price announcement would be free of charge. We propose Ofcom designate a nationally defined prefix, of the form “1xx”. To obtain pricing information, callers dial the telephone number, prefixed by 1xx. They will hear a free announcement giving an accurate price for the call for that time of day. Because this call originates from the actual phone/mobile that is being billed by the OCP, then OCP will be able to provide an accurate price. The announcement will be of short duration as it deals with the call price at that time of day e.g. **“This call costs: 5 pence plus 5 pence per minute, thereafter”**.

Thus, at a stroke, Ofcom will have delivered effective consumer price protection, where the buyer of call service is always aware of the call price, for any call and at anytime. Calls now have a price label. At the same time Price Labelling, will be a very strong driver for both lower call charges, simpler tariffs and stronger competition due to increase price visibility. In simple terms, Ofcom must force all OCPs to deliver accurate Call Price Labelling to their customers. Our detailed proposal and feasibility analysis is set out below. Few OCPs would dare introduce this facility unilaterally, we know of only one to date<sup>4</sup> and this works very well in our experience. SMPs<sup>5</sup> will not want to introduce Call Price Labelling. They have the most to lose and will resist.

4. Marketing of the new 1xx prefix could be achieved, cost effectively, by asking **ICSTIS** to change its mandatory pricing text on Premium Rate numbers advertising to...  
**“Calls may cost more. To check the latest price, dial 1xx followed by the number”**
5. The introduction of Call Price Labelling will enable the application of **Caveat Emptor** in the Telecom Market. Consumers will always be able to check the price before making any call.
6. With today's technology, Call Price Labelling is straightforward. In the unlikely event that Ofcom will fail to implement this proposal, then FleXtel will lobby the Press. We will also contact the Designated Consumer Bodies<sup>6</sup>, (under the Enterprise Act<sup>7</sup>) in order to raise a Super-Complaint<sup>8</sup> regarding the severe lack of price transparency in the UK Telecom Market, which appears to be **“significantly harming the interests of consumers”**.

<sup>1</sup> [http://www.ofcom.org.uk/consult/condocs/personal\\_numbering/](http://www.ofcom.org.uk/consult/condocs/personal_numbering/) (Publication date: 26 October 2005)

<sup>2</sup> [http://www.ofcom.org.uk/telecoms/ioi/numbers/num\\_070\\_guide](http://www.ofcom.org.uk/telecoms/ioi/numbers/num_070_guide)

<sup>3</sup> Originating CP set the call tariff and billing the customer – only OCPs have accurate charging information.

<sup>4</sup> <http://www.call18866.co.uk/rates.php>

<sup>5</sup> Significant Market Players such as BT, Vodafone and some other CPs in certain sectors.

<sup>6</sup> The Consumers' Association, National Consumer Council and Citizens Advice

<sup>7</sup> <http://www.dti.gov.uk/ccp/enterpriseact/intro.htm>

<sup>8</sup> <http://www.dti.gov.uk/ccp/topics1/enforcement.htm#super>

## Basis for Our Response

1. We have always supported Ofcom/Oftel in its endeavours to stabilise the Telecom Market in the presence of an excessive level of dubious business practices, swindles and scams. Such practices lead to consumer complaints in not only Personal Numbering (070), but also in Number Translation (08xx) and Premium Rate (09xx) services.
2. We believe that Oftel issued the original Guidelines and Ofcom revised them in January 2004. FleXtel initially supported them, as a possible way forward. However, our subsequent experience since their inception, over four years ago, now shows that these Guidelines to be ineffective and impractical. They serve to restrict Innovation and hence competition. They have not delivered the desired consumer protection. This is even more necessary due to wider problems with the current UK Telecom Market, reflected by the plethora consultations<sup>9</sup>. In particular the recent NTS consultation<sup>10</sup> is in our opinion a problem created by consumer confusion over the cost of calls caused by a lack of good price transparency.
3. We also suggest, that it is both unreasonable and naïve of Ofcom to ask any CP to police the detailed use of their services. Today, the phone numbers we operate and our competitors operate are issued free of charge, over the Internet from a website, with user entered data. This is the reality of today's free market in Telecoms.

Ofcom's key obligation, within the Guidelines, is equivalent to asking DIY stores to ensure that crowbars are not used for burglary! Like any normal business, we are happy to cooperate with the authorities in the event of a criminal investigation. Indeed we routinely provide data to the police, with a 24hour-priority service and we pro-actively support the police in such activities.

Since the Guidelines are both impractical and unreasonable and, it is our contention, that they have no impact on unscrupulous Customers or CPs, who simply ignore them, we propose they are deleted and replaced by Call Price Labelling.

4. We strongly suggest **that Ofcom has failed in its duty of care** for consumers, by not delivering an obvious regulatory regime that would simultaneously protects consumers, whilst promoting competition. Price transparency is a keystone to the correct operation of any free market.

Although we would agree that in 1984, Price Transparency was not technically feasible for the UK Telecom Market, twenty years later with the technology as such, it is now verging on the trivial for the companies involved.

Ofcom has failed to recognise this obvious opportunity and, instead, has **adopted a piecemeal approach of micro-regulation**. This has lead to an unenforceable mass of bureaucracy and confusion.

5. The result is a severe loss of consumer confidence and at the same time the generation of an environment of uncertainty in the Telecom Business community, where investors are left wondering what Ofcom is going to do next...
6. The biggest risk to our business over the last 10 years has been the next move of the Regulator. Ofcom is beginning to look like a loose cannon in the UK's mature and complex free market in Telecoms.
7. The introduction of Call Price Labelling will enable the application of **Caveat Emptor** in the Telecom Market. Consumers will always be able to check the price before making any call. Furthermore, it will also remove the need for complex micro-regulation that is damaging investment in the UK telecom market.

<sup>9</sup> <http://www.ofcom.org.uk/consult/condocs/?sector=Telecoms>

<sup>10</sup> [http://www.ofcom.org.uk/consult/condocs/nts\\_forward/](http://www.ofcom.org.uk/consult/condocs/nts_forward/)

## **Proposal for Call Price Labelling**

*...delivering clear, accurate, call price transparency to the UK Telecom Market*

*Offering Consumers Protection, Innovation and Choice, whilst preserving Market Competition.*

### **Background**

Free markets only function well, when they offer good price transparency. As we will demonstrate, the UK Telecom Market (and others worldwide) exhibits extreme price opacity. With today's technology, this is no longer necessary. Today, there is more processing power in a mobile phone, than in the entire billing systems of major telecom operators in the early 1980s. Telecom Regulators worldwide should be looking to deliver this vital ingredient to drive efficient competition within their respective free markets. We expect Significant Market Players (SMPs) to challenge the feasibility of the following proposal, to protect their vested interests of market share.

The phrase *caveat emptor*, or *buyer beware* is well known, it is a fundamental principle of free markets. In supermarkets, it is applied, everyday, by millions of consumers. Buyers have choice... e.g. a cheap can of beans with a mediocre quality or a more expensive can with perhaps better flavour and texture. A critical factor in making that choice is the cost of the product clearly labelled, by law. The buyer expects to pay this price. He does not need to refer to a complex tariff table for the daytime, evening or weekend. Buyers know that at the checkout they pay the labelled price.

Consider now that a consumer decides to place a call. Here a decision is being made to purchase telecom service. How can the consumer make an informed choice, if the price of the service is obscure, or worse, misleading?

### **The Problem of Price Opacity – in today's Telecom Market**

1. Today there are over 100 Originating Communications Providers (OCPs).
2. Many OCPs have several tariff packages.
3. Tariff packages can be complex, with inclusive minutes, the eligibility of such depending on on-net or off-net calls. E.g. A Vodafone-Vodafone call is on-net. Vodafone to Orange is off-net.
4. Off-net calls are now discriminated against in tariff packages from fixed line operators.
5. Many operators also discriminate against Personal, NTS and even Freephone<sup>11</sup> numbers.

Therefore, the cost of a call can found by checking...

- a) Which package the phone/mobile is on?
- b) The type of call?  
E.g. on/off-net, freephone, landline, mobile, NTS, Personal Number or international?
- c) Does the tariff have a package of inclusive minutes?
  - i) If so, is this type of call included?
  - ii) If so...
    - a. Are there any included minutes left in the package? or
    - b. Are they all used up this month?
- d) The time of day?
- e) The day of the week?

We would challenge anyone who claims that they completely understand the tariff package for their phone/mobile, except perhaps the clever designers of the package within the OCPs!

---

<sup>11</sup> Vodafone and other mobile operators charge for 0800 calls.

At the present time there are no guidelines, as to the form of OCP tariffs. Nor, surprisingly, has Ofcom attempted to regulate this area e.g. the quality and ease of access to this vital consumer guidance. In fact Ofcom has studiously ignored mobile tariffs in all of its recent consultations. Here is an example of the full table expanded from that given by Ofcom recently<sup>12</sup> which only dealt with the cost from a BT Public Payphone! To make it realistic we've averaged the call cost over a typical 3 minute call.

<b>Daytime calls, worst case pricing to show risk to consumers</b>					
for a typical 3 minute call e.g to doctors or public services					
<b>Operator</b>	<b>Landline</b>	<b>0844</b>	<b>0845</b>	<b>0870</b>	<b>0871</b>
BT	9p	15p	12p	24p	30p
BT Payphone	30p	42p	50p	50p	50p
Orange	45p	75p	75p	75p	75p
Three	45p	45p	45p	45p	45p
Virgin	45p	30p	30p	30p	30p
O2	75p	105p	105p	105p	105p
T-Mobile	90p	120p	120p	120p	120p
Vodafone	90p	180p	180p	180p	180p

 *Prepay mobile cited - for low income families, who cannot afford BT line rental.*

Notice how a 3 minute call to a non-landline can be as high as £1.80p from some mobiles! How can Ofcom ignore these massive price mark-ups? Such mark-up will hit the lower income families, who use pre-pay as a form of cheap phone service. Clearly this analysis shows that the potential for consumer confusion is very high.

It took FlexTel staff a number of hours to construct the above very simplified table.

**We challenge Ofcom to...**

1. Check the above table for accuracy.
2. Visit various OCP websites and find any simple and clear price guidelines.
3. Call OCP customer bill inquiry centres and note the quality of the response.

Naturally we cannot vouch for the accuracy of the above table and we suggest you check prices with the above noted OCPs.

<sup>12</sup> <http://www.ofcom.org.uk/media/mofaq/telecoms/nts/>

Now consider a recent typical BT “simplified” tariff...

## Pay just 25p for landline to UK mobile calls up to an hour

You could **SAVE** with low rates for shorter calls with BT Business Plan Tailored Option

**BT Business Plan** is a discounted calls tariff designed to give you a better deal on your business calls for up to an hour:

- **NEW** – pay no more than 25p for most UK landline-to-mobile calls for up to an hour<sup>^</sup>
- Pay no more than 10p for UK<sup>#</sup> Local and National calls for up to an hour<sup>^^</sup>
- Call any one of 32 countries for up to one hour for just 20p<sup>^^</sup>
- Call the USA for up to one hour for just 10p<sup>^^</sup>

Spend more than £250 a year on calls and your business could also benefit from these services at no extra charge:

- 24-hour support\*
- Call analysis reports with Network Call Performance\*\*
- Connection/conversion to ISDN2e\*\*\* or Featureline Compact\* (see pages 18-19)
- **5% credit** on eligible calls after 12 months\*\*

BT Business Plan option	Standard option				Tailored option		
	Lite	250	500	750	250	500	750
Annual call spend commitment	X	£250	£500	£750	£250	£500	£750
UK capped call rates (up to 60 minutes)	10p	10p	10p	10p	20p	20p	20p
Pence per minute (for calls under 10p or calls over 60 minutes)	3.5p	3.1p	2.7p	2.7p	2.5p	1.99p	1.99p
Capped UK landline to-mobile calls <sup>†</sup> (up to 60 minutes)	25p	25p	25p	25p	25p	25p	25p
Capped international call rates	X	X	X	✓	X	X	✓
<b>FREE</b> customer service number	✓	✓	✓	✓	✓	✓	✓
<b>10% off</b> line rental with Business Line reward <sup>***</sup>	✓	✓	✓	✓	✓	✓	✓
Regular account reviews	Online only	✓	✓	✓	✓	✓	✓

<sup>#</sup>Applies to Local and National calls within the UK only. Excludes mobile and non-geographic numbers (0870, 0845) Internet and premium rate. Other call restrictions apply. <sup>\*</sup>Opt in required. 7p set up fee applies. Pence per minute rates apply after 60 minutes. Applies to calls to number ranges owned by the 4 main mobile operators only. Certain mobile numbers (eg original 3G numbers) excluded. Pence per minute rates apply once the total number of capped calls from any single line to any one mobile exceeds an average of 4 hours per day in any calendar month. Terms and conditions apply. <sup>\*\*</sup>Annual minimum call spend and reconciliation fees apply (except with BT Business Plan Lite). International capped calls are only available on the BT Business Plan 750 tier. Pence per minute rates apply once the total number of capped calls from any one line to a single number exceeds an average of 4 hours per day in any calendar month. Landline calls only. Exclusions apply. Terms and conditions apply. <sup>\*\*\*</sup>Available to BT Business Plan customers who register for Business Line Reward online, register to receive their bill online and to pay via Monthly Payment Plan. Minimum 12 month contract. Exclusions and conditions apply. <sup>\*</sup>BT will respond within four hours of receipt of a fault report, except where the fault does not immediately affect the use of your equipment. If the fault is not cleared during this period, BT will advise you of progress being made to clear the fault. This service is available for your BT Business Plan lines (excluding Private Circuits) at no charge, within the initial one-year contract period, upon your application to BT. <sup>\*\*</sup>Opt in required. If committed spend is under £5,000 these reports are free for 6 months and you get 1 report a month. Unlimited reports included where minimum spend over £5,000. <sup>\*\*\*</sup>Subject to survey and availability. Additional equipment may be required. Additional installation charges may apply. Minimum contract 12 months. Terms and conditions apply and reconciliation fees may apply. <sup>†</sup>12 month minimum rental charges apply. Some lines excluded. <sup>\*\*</sup>5% reward credit is based on your eligible call spend. To find out which calls are eligible see [www.bt.com/businessplan](http://www.bt.com/businessplan) If 90% of your annual committed call spend isn't reached, 5% will be rewarded on your commitment tier. Reconciliation fees apply if annual spend threshold is not met. <sup>†</sup>Applies to most UK mobiles.

All prices exclude VAT. Accurate at time of going to press, but may vary from time to time.

See how much you could save.  
 Try our online Account Checker  
 at [www.bt.com/businessplan](http://www.bt.com/businessplan)



[www.bt.com/mybusiness](http://www.bt.com/mybusiness)

We draw your attention to the small print... Need we need say more?

We believe that before Consumers place calls, they should have an opportunity to check the price of that call. For advertised numbers the Consumers even of premium rate service can only get misleading guidance, as very clearly indicated in a recent response to Ofcom by the Norfolk County Council, Trading Standards Department<sup>13</sup>. Only the OCP, which controls the tariff and billing process, can give an accurate price for each call.

The only way forward is to introduce call by call price labelling, now....

<sup>13</sup> [http://www.ofcom.org.uk/consult/condocs/nts\\_forward/responses/mr/norfolk.pdf](http://www.ofcom.org.uk/consult/condocs/nts_forward/responses/mr/norfolk.pdf)

## The Detail

Using our over 20 years experience in this market<sup>14</sup>, we have carefully considered the technical, operational and cost implications of the introduction of Call Price Labelling, we offer 3 options...

### Option 1 - Every Call has Price Labelling

The caller dials the normal number and during the ringing phase of the call setup, hears a, free of charge, price announcement of the form... ***"This call costs: 5 pence plus 5 pence per minute, thereafter"***. The Caller on hearing the price chooses to either Hold for connection, or End the call.

#### Benefits

-  No change to dialling procedure.
-  No access code required.

#### Problems

-  Early answer will stop the price announcement and charging will start before the caller decided.
-  No consumer choice, every call is priced – some may find the announcement annoying.
-  The changeover to every call being processed will present significant operational challenges to many, if not most OCPs.

### Option 2 – Caller dials a Prefix for Price Labelling and can be through connected

The caller dials the number prefixed with 1xx and hears a, free of charge, price announcement, before call setup, of the form... ***"This call costs: 5 pence plus 5 pence per minute, thereafter"***. The Caller on hearing the price chooses to either Hold for connection or End the call.

#### Benefits

-  Consumer choice.
-  No operational impact on normal call processing.
-  The changeover will present much lower operational challenges to most OCPs.
-  Cost of implementation will be lower than Option 1 – only some calls use the price labelling.
-  Early answer by called party cannot interrupt the price announcement.

#### Problems

-  Through connection of call may present cost and operational obstacles for some smaller OCPs.

### Option 3 – Caller dials a Prefix for Price Labelling. No through connect

The caller dials the number prefixed with 1xx and hears a, free of charge, price announcement, of the form... ***"This call costs: 5 pence plus 5 pence per minute, thereafter"***  
If the price is acceptable, then the Caller dials the number as normal,.

#### Benefits

-  Consumer choice.
-  The changeover will present very low operational challenges to most OCPs
-  No operational impact on normal call processing.
-  Number of calls to the Price labelling system will be much lower than Options 1 and 2.
-  Cost of implementation will be lower than Option 1 and 2, as the call does not need through connection and call volume will be less.
-  Price announcement can be repeated until the caller hangs up.
-  Potential for automatic connection to operator assistance in case of pricing queries.

#### Problems

-  Consumer has to make two calls.
-  Not easy to store labelled call number in phone/mobile memory.
-  OCPs will resist implementation especially those with SMP.

<sup>14</sup> See appendix A

## Our Recommendations

Based on our operational experience we recommend Option 3 as the most cost effective and lowest risk option for delivery of price transparency to the UK Telecom Market.

We recommend Option 2 be considered for introduction only after an assessment period to gain operational experience with Option 3. Option 2 will exhibit higher cost and implementation risk to OCPs. However Consumers could store the prefix plus number in phone memories so this methodology has merit.

We feel Option 1, is costly, risks UK network stability and has a number of operational and consumer based problems too detailed to be discussed here. We do not recommend it and only include it for completeness. However, any OCP should be permitted to implement this option, in addition to the 1xx service. We recommend that it should be customer selectable, via a web interface or customer service request, as per 18866<sup>15</sup> service mentioned earlier.

## Public Awareness

Naturally, the 1xx prefix could be supported with a marketing campaign, but this could be expensive. Fortunately, this may not be necessary. By simply replacing the **ICSTIS**<sup>16</sup> suggested form of words...

- *Calls cost £X per minute; calls from mobiles and some networks may be higher.*
- *Calls cost £X per minute; calls from mobiles and some other networks may cost more.*
- *Calls cost £X per minute from BT landlines.*

With...

***“Calls may cost more. To check the latest price, dial 1xx followed by the number”***

The public will soon become aware of the new Call Price Labelling service.

## Other Impact

It is interesting to quote the objective<sup>17</sup> of **ICSTIS** here...

***“It is the Committee’s desire that the consumer should have as full an understanding as possible of the likely charge for a call to a premium rate service before dialling”.***

We believe the suggested text, in conjunction with mandatory Price Labelling, meets the laudable **ICSTIS** objective.

Finally, it is no good asking the Premium rate, NTS or Personal Numbering CPs to deliver this information. Only an OCP holds accurate pricing information for its customers. Asking any other CP to deliver it is not only impractical, but also misleading. Trading Standards have already got serious problems with the current Ofcom approach and the current **ICSTIS** text.

We believe that the proposed text with Option 3 would be fully approved by many Consumer Protection Organisations, including Trading Standards, as it delivers accurate Pricing information to the consumer..

---

<sup>15</sup> <http://www.18866.co.uk/>

<sup>16</sup> <http://www.icstis.org.uk/> - ICSTIS Guideline No. 1 - Pricing Information

<sup>17</sup> [http://www.icstis.org.uk/icstis2002/pdf/GUIDELINE\\_01.PDF](http://www.icstis.org.uk/icstis2002/pdf/GUIDELINE_01.PDF)

## Annex A – FleXtel Background

### Our Experience

FleXtel's founder, Mr William Goodall, has over twenty years experience in the UK and international Telecom markets, since 1983 when BT still had a monopoly in both mobile and fixed telephony markets.

- 📄 **1983-1989** – Head of Telecom, Vodafone – Founder member of initial team of 10.
- 📄 **1990-1992** – Advisor to Oftel.
- 📄 **1990-date** – Advisor to private-sector Mobile Operators, at CEO level, in... France, Germany, Norway, Poland, Sweden, United Kingdom and Ukraine.
- 📄 **1993-date** – Founded, launched and operated first UK Personal Numbering service in 1993<sup>18</sup>  
 FleXtel has operated for over 10 years, without Oftel/Ofcom complaint.

### Key Milestones and Customer Status in UK Telecom 1983-2005

Year	Milestone	Customer Status	Tariff	Effect
1983	BT Monopoly	BT subscriber, sign-up via paper contract.	Paid quarterly rental at fixed address, simple call-charge structure.	Telecom scams very rare, but service more expensive than other deregulated markets e.g. USA.
1984	Telecommunications Act 1984 <sup>19</sup>	BT and Mercury subscribers, sign-up via paper contract.	Paid quarterly/month rental at fixed address, simple call-charge structure.	BT prices controlled by Regulator. Mercury competes on price.
1985	Mobile Operators licensed and launch	Cellnet and Vodafone subscribers paper sign-up.	Paid monthly at fixed address. Single tariff structure, one package for all.	Mobile compete on coverage, not price.
1991	White paper <sup>20</sup>	Many operators to follow	Assumed competition would drive down prices	Many complex tariffs to come... ...will lead to Consumer confusion.
1993	FleXtel licensed and launches.	Launch first PN service papers sign-up. One of the first SMEs to market.	Annual fee, no call charges to user.	No call charges results in no bills and hence a much weaker contractual relationship with the consumer.
1993/5	Many new corporate and SME operators launch.	Customer sign-up made very simple with little paper work by fax.	Massive variations in both call and service tariffs.	Widespread consumer confusion over cost of calling services.
1995/6	Internet adopted for direct sales	Electronic contract. Customers are no longer subscribers of telecom services. There is no subscription fee.	Free sign-up and no service fee.	📞 Customer – CP contractual relationship weak. 📞 Widespread consumer confusion over tariffs. 📞 Poor OCP publication of very obscure tariffs.
2003	Communications Act <sup>21</sup> All licences revoked, now CP is any entity with telecom infrastructure. (E.g. PC with voice card?)	Customer of class licensed operator. Electronic sign-up via website. Free service.	Various. From 1p/min to 50p/mins, depending on application and service proposition.	Many CP, some of which disappear overnight. Increasing level of scams, relying on... Consumer confusion over call costs.
2003-2005	Ofcom takes over Oftel role	Customers turn to press <sup>22</sup> and anarchic websites <sup>23</sup> , rather than Ofcom, for support.	Total tariff confusion. Ofcom attempts to <b>fix</b> the problem by increasing micro-regulation and <b>tinkering</b> with market.	Ofcom driven by complaints from both consumers and lobbying from significant market players <sup>24</sup> . Result... Confused regulation lacking overarching strategy.

<sup>18</sup> <http://www.flextel.com/press/financial-times-1993.gif>

<sup>19</sup> [http://www.communicationsbill.gov.uk/legislation/Telecommunications\\_Act\\_1984.doc](http://www.communicationsbill.gov.uk/legislation/Telecommunications_Act_1984.doc)

<sup>20</sup> <http://www.bopcris.ac.uk/bopall/ref23216.html>

and <http://www.publications.parliament.uk/pa/cm199091/cmhansrd/1990-11-13/Debate-1.html>

<sup>21</sup> <http://www.communicationsbill.gov.uk>

<sup>22</sup> <http://www.telegraph.co.uk/news/main.jhtml?xml=/news/2005/08/06/nphone06.xml> [Cost of lucrative phone lines to be clear in ads]

[http://www.thisismoney.co.uk/money-savers/article.html?in\\_article\\_id=404015&in\\_page\\_id=5](http://www.thisismoney.co.uk/money-savers/article.html?in_article_id=404015&in_page_id=5) [0870's days are numbered]

<sup>23</sup> <http://www.saynoto0870.com/>

<sup>24</sup> <http://business.scotsman.com/banking.cfm?id=764772005> [BT calls on Ofcom to scrap 'rip-off' numbers]