

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Draft Annual Plan – 14th December, 2005

To (Ofcom contact): Alistair Bridge

Name of respondent: FleXtel

Representing (self or organisation/s): FleXtel Limited

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing	<input checked="" type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

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. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.



William R Goodall BSc CEng FIEE
Chairman



Ray Nixon BSc MIEE
Chief Executive

We thank Ofcom for the opportunity to comment on the **Draft Annual Plan**¹.

As our expertise lies in the area of Telecommunications², we will comment only in this area of the Plan.

Our Response

Question 1 – *What are your views on Ofcom's proposed priorities for 2006/7?*

Price Transparency

We have carefully reviewed Ofcom's Plan and its work program. We believe that Ofcom is not viewing the UK Telecom Market at a high enough level. It is therefore putting the "cart before the horse", by the introduction of a plethora of micro-regulations³ and draconian Market intervention⁴ with no clear overarching strategy in-place.

Having studied Ofcom's Strategic Review of Telecommunications, we cannot see a clear strategy for the proper regulation of the Telecom Market. The Strategy fails to recognise adequately that, by deleting the Telecom Act 1984 licences under the Communications Act 2003, a level of Market protection was lost, not only for the Stakeholders, but, far more importantly, the Citizen-Consumer.



It is obvious to us that, in 2003, the transformation to a fully-fledged free market was the intention of Government. Unfortunately the Regulator has failed, and continues to fail, in its duty to support this; nor to protect the Citizen-Consumer from pricing excesses.

It is well known that a free market can only operate well, if there is a large measure of price transparency. We are sure that the Economists within Ofcom would agree with this statement and support it. We put it to Ofcom that unlike water, gas or electricity supply, Telecoms tariffs are generally highly complex, some would say 'devious and tricky'. Pricing in Telecoms markets is generally opaque. Ofcom recognises this, but responds using RPI-X price controls in the fixed and mobile markets. These always damage the Market, make it artificial and stifle competition.

At the point of service delivery (*of a call*), we claim that, in general, the Consumer is not able to accurately estimate the cost of such a call. In fact some Consumers may have to wait up to three months, for bill delivery, to find out such costs. Prediction of the call cost, before purchasing the service (*making a call*), is typically an option only for the highly numerate and knowledgeable. See the section entitled "The Problem of Price Opacity" below for more detail.

We strongly recommend that, to avoid a referral to the OFT, Ofcom considers how to dramatically improve call price transparency. We offer our proposal for Call Price Labelling, which we believe delivers a practical, cost effective and fair solution to the problem.

If implemented we believe the result would be enhanced protection for the Citizen-Consumer from:-

-  Call back swindles e.g. CLI dumping.
-  The worst excesses of opportunistic tariffs for non-headline services, such as 0800, 0845 and 0870 charging by the mobile networks/resellers. (See our comparison table below).

We would therefore suggest that Ofcom set the **Delivery of Improved Price Transparency** as an essential plank in its Telecoms Strategy and at high priority in this year's Plan.

¹ http://www.ofcom.org.uk/consult/condocs/annual_plan2006/annual_plan200607/ (Publication date: 14 December 2005)

² FlexTel personnel have operated in the Telecom Market for over 20 years, since 1983 and helped found Vodafone.

³ http://www.ofcom.org.uk/consult/condocs/personal_numbering/responses/Flextelresponse.pdf

⁴ http://www.ofcom.org.uk/consult/condocs/nts_forward/responses/af/flextel.pdf

NTS & Numbering

We recommend Ofcom consider the reuse of the old London 081 number range, to deliver two new bespoke codes, open to national and international access: e.g. 0811 at true local rate and 0812 true national rate. At the same time implement the Number Translation Service Proposals, as clearly set out on page 27 of Ofcom's Annual Report 2004/5⁵ published in July 2005. This would deliver the ideal equal open access to all Citizens, that Government seems to desire, without damaging current NTS markets.


Ofcom published proposals for public consultation which set out:

- the removal of links between BT's 0845 and 0870 tariffs with BT local and national rates;
- the introduction of new price ceilings for calls on BT's network, of four pence per minute for calls to 0845 numbers and eight pence per minute for calls to 0870;


Extract from the Annual Report 2004/5

In the light of the recent NTS consultation, published only two months later than the Annual Report and with totally different options, none of which offer the above noted proposals. Does Ofcom consider that it may have misled the Telecom market and NTS Stakeholders?

Question 2 – *What are your views on the citizen and consumer issues which Ofcom should address in 2006/7?*


 Protection from excessive call charges by the delivery of Call Price Labelling or similar.


Question 3 – *What are your views on the work which Ofcom should do in 2006/7 to encourage innovation?*

 Avoid draconian and ill-considered intervention in the Market as per Ofcom's Number Translation Services: A way forward⁶ proposals. We claim that NTS and Personal Numbers are critical to bridge Communications Convergence in an efficient manner. Instead consider the reuse of the old London 081 code, after over 10 years of quarantine, to deliver two new bespoke codes, open to national and international access: e.g. 0811 at true local rate and 0812 true national rate. This to be in conjunction to the de-linking of 0845 and 0870 from geographic rates. This would deliver the ideal equal open access to all Citizens, which Government seems to desire. We have written separately to Ofcom on this issue.

Question 4 – *What are your views on the work which Ofcom should do in 2006/7 to promote competition?*

 Introduce Call Price Labelling to drive down prices.


 Avoid draconian and ill-considered intervention in the Market as per the NTS Way Forward proposals that attack the grass roots in the Telecoms service industry.


 Recognise that much innovation will come from SMEs and not the incumbent SMP players, who have vested interests in milking their cash-cow business segments. Examples of former SME are Virgin, Amstrad, Google, Microsoft, Vodafone (Racal) and HP. FlexTel, a privately funded SME, founded the UK's first Personal Numbering service in 1993.

⁵ http://www.ofcom.org.uk/about/accoun/reports_plans/annrep0405/0405b.pdf


⁶ http://www.ofcom.org.uk/consult/condocs/nts_forward/

Question 5 – Are there additional areas where Ofcom should reduce or better target regulation?
Please provide specific examples.

-  Reduce the number and detail of many Ofcom's guidelines, attempting to control pricing scams and abuse. They serve to restrict the honest brokers in the industry, whilst being ignored by the target scammers. Since 2003, anyone can be established as a full Telco, using a standard PC with PCI cards. We claim that it is therefore not possible for Ofcom, or any politically expedient delegated quango, to police the adherence to such, at any useful level. Nor is it reasonable for the Regulator to expect Stakeholders to "know their customers" or enforce such adherence. The implication of many of the guidelines is that Stakeholders should pre-vet customers, before permitting connection. Alternatively, they must disconnect on "suspicion" of abuse. The legal implications of the latter, precipitous, action are likely to be worse than Ofcom's sanctions.

-  Ofcom should carefully consider the Market impact of any Consultation **before** publishing. The recent Number Translation Services: A way forward proposal have had a significant impact on NTS Stakeholder business confidence and have already led to a number of redundancies. To draw a parallel in the Media arena, which Ofcom may better understand:-
 - Would it be **safe** for Ofcom to consult on the closure of the Terrestrial Digital TV service (Freeview), say, in the light of excessive competition from the Internet, Satellite channels?

 - Would not the very act of publishing such a mythical document severely dent sales of digital TV and set-top-boxes, in the high street, at least in the short term, regardless of final outcome?

-  FleXtel is deeply concerned by the impact the NTS consultation is having on our market and the threat to our 08xx business.
It is even more galling, when the obvious, none-provocative solution to reuse 081 was not considered by Ofcom's Telecoms "experts".

Basis for Our Response

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 Freephone⁷ numbers.

Therefore, the cost of a call can be 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 to completely understand the tariff package for their phone/mobile, except perhaps the clever designers of the package within their Telecom Service Provider!

1. 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 the 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.

2. 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...
3. The introduction of Call Price Labelling will support the principles 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.

⁷ Vodafone and other mobile operators charge for 0800 calls.

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. Now, we have 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?

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 recently⁸ 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.

Daytime calls, worst case pricing to show risk to consumers						
for a typical 3 minute call e.g to doctors or public services						
Operator	Landline	0800	0844	0845	0870	0871
BT	9p	Free	15p	12p	24p	30p
BT Payphone	30p	Free	42p	50p	50p	50p
Orange	45p	75p	75p	75p	75p	75p
Three	45p	45p	45p	45p	45p	45p
Virgin	45p	45p	30p	30p	30p	30p
O2	75p	105p	105p	105p	105p	105p
T-Mobile	90p	120p	120p	120p	120p	120p
Vodafone	90p	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 telephone service. Clearly, this analysis shows that the potential for consumer confusion is extremely 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.

⁸ <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[^]
- Pay no more than 10p for UK[#] Local and National calls for up to an hour^{^^}
- Call any one of 32 countries for up to one hour for just 20p^{^^}
- Call the USA for up to one hour for just 10p^{^^}

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 [†] (up to 60 minutes)	25p	25p	25p	25p	25p	25p	25p
Capped international call rates	X	X	X	✓	X	X	✓
FREE customer service number	✓	✓	✓	✓	✓	✓	✓
10% off line rental with Business Line reward ^{***}	✓	✓	✓	✓	✓	✓	✓
Regular account reviews	Online only	✓	✓	✓	✓	✓	✓

[#]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. ^{*}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. ^{**}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. ^{***}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. ^{*}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. ^{**}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. ^{***}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. ^{*}12 month minimum rental charges apply. Some lines excluded. ^{**}5% reward credit is based on your eligible call spend. To find out which calls are eligible see 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. [†]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


www.bt.com/mybusiness

We draw your attention to the small print... Need we 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 Department⁹. 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....

⁹ http://www.ofcom.org.uk/consult/condocs/nts_forward/responses/mr/norfolk.pdf



The Detail

Using our over 20 years experience in this market¹⁰, 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 is not possible, so the price announcement cannot be interrupted.








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.

¹⁰ 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 18866¹¹ 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**¹² 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 objective¹³ 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..

¹¹ <http://www.18866.co.uk/>

¹² <http://www.icstis.org.uk/> - ICSTIS Guideline No. 1 - Pricing Information

¹³ 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 1993¹⁴
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, signup 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 ¹⁵	BT and Mercury subscribers, signup 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 ¹⁶	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 ¹⁷ All licences revoked, now CP is any entity with telecom infrastructure. (E.g. PC with voice card?)	Customer of class licensed operator. Electronic signup 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 ¹⁸ and anarchic websites ¹⁹ , rather than Ofcom, for support.	Total tariff confusion. Ofcom attempts to fix the problem by increasing micro-regulation and tinkering with market.	Ofcom driven by complaints from both consumers and lobbying from significant market players ²⁰ . Result... Confused regulation lacking overarching strategy.

¹⁴ <http://www.flextel.com/press/financial-times-1993.gif>

¹⁵ http://www.communicationsbill.gov.uk/legislation/Telecommunications_Act_1984.doc

¹⁶ <http://www.bopcris.ac.uk/bopall/ref23216.html>

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

¹⁷ <http://www.communicationsbill.gov.uk>

¹⁸ <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 [0870's days are numbered]

¹⁹ <http://www.saynoto0870.com/>

²⁰ <http://business.scotsman.com/banking.cfm?id=764772005> [BT calls on Ofcom to scrap 'rip-off' numbers]