

Orange            07866 571910  
e-mail            aleyne.johnson@orange-ftgroup.com

Franck David  
Public Petitions Committee  
The Scottish Parliament  
TG.01  
Edinburgh EH99 1SP

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Dear Mr David

**Consideration of Petition PE1285**

I am writing in response to your request for information from Orange relating to Petition PE1285, regarding costs associated with calling NHS24 from mobile phones. As requested, Orange provides relevant information on the subject below.

I hope you find the information useful.

Yours sincerely

Aleyne Johnson  
**Government & Public Policy Manager**



## **Orange comments on Scottish Parliament Petition PE1285 - costs associated with calling NHS24 from mobile phones.**

### ***Differing charging for different number ranges***

A variety of number ranges have been made available by Ofcom over the years, with different charging structures, so that different organisations have options available in deciding which number range would offer the best return and fit for the service they wish to offer. All organisations that set up a service would normally have a choice of what number range they think is appropriate in terms of best brand fit, revenue share, and end user expectations.

### **0845 numbers**

- The interconnect charges, the costs that one telecoms operator has to pay to transfer calls onto the network of another operator, for 0845 are high when compared with many other number ranges. Calls from a mobile are subject to this cost because BT (and other operators who host or “terminate” 0845 numbers) charges operators a fee for its “termination” service. Mobile operators have no option but to pay BT these charges if we are to be able to connect calls from our network to theirs. Mobile operators, therefore, recoup these costs from the user.
- Furthermore, it should be noted that in addition to these interconnect costs, the cost of originating calls from a mobile network (i.e. of allowing a mobile customer to call a 0845 number) is higher than that from a fixed line network.
- 0845 numbers are used by a wide range of commercial companies and a number of public sector organisations.
- The Committee should be reminded that the revenue from 0845 is shared. This means that the company or service that holds the number receives income from the calls (either in the form of revenue from the host/terminating provider or network services “in kind”) and so, in this case, some of the costs of calling NHS 24 go towards, we assume, funding the service.
- Orange makes the cost of calling 0845 numbers clear in its Price Guide (e.g. [www.orange.co.uk/paymonthlyguide](http://www.orange.co.uk/paymonthlyguide) (page 18))

### **‘Free to customer’ 08 numbers**

- Orange makes no charge to customers calling 080 helplines which are subscribed to The Helpline Association (THA) scheme.
- The THA’s membership includes charity helplines which meet the organisation’s membership criteria. The scheme covers a vast array of helplines, often run by charitable organisations, that serve the public and there are now around 250 charity and helpline numbers that the THA supports.
- Orange has decided that it should not charge for calls to these helplines, even though we do not therefore cover our own costs for those calls and lose money on providing the service.



### **030 – for public sector bodies**

- Ofcom has created the 030 range deliberately to address concerns about pricing transparency for public sector bodies. 030 telephone numbers have been exclusively reserved for public sector and not for profit bodies.
- All mobile operators have to charge 030 numbers in the same way as they would charge 01 and 02 (i.e. calls to these numbers must be included within a customer's bundle of minutes in their mobile tariff as per any other 01 or 02 number).
- Whilst these calls would not be free to customers, they would be brought into line with standard calls charges and would be effectively free to any customer with inclusive bundled minutes.
- Unfortunately, despite this worthwhile Ofcom initiative, some public sector organisations have been slow to adopt the 030 telephone numbers which have been provided for them and which would benefit the public.

### **Broader problem of public sector numbering**

- There is a general problem with the numbers used by public sector bodies as there is no consistent use of telephone numbers within the public sector. Currently, such bodies use numbers beginning 01/02, 0800, 0844, 0845 and 030 and this confusing array of numbers obviously adds to the difficulties which consumers experience.
- Orange ensures that its pricing is clear and transparent and would refer you to our comprehensive price guide, which sets out the cost of calling any number range from Orange. [www.orange.co.uk/paymonthlyguide](http://www.orange.co.uk/paymonthlyguide)

***“Does it agree that calls from mobile phones to NHS 24 should be free of all charge to patients? If not, why not?”***

***“Will it consider making such calls free? If not, will it consider rescinding any minimum charge that may already apply? If not, why not?”***

- Making the calls to such a number from a mobile does incur a cost. Mobile operators have no choice but to pay BT a fee to connect the calls as well as the costs of using their own mobile network.
- A 'free to customer' service would not be free to the mobile operator, who would still need to cover its costs.
- Preferable alternatives would be the better use of the deliberately designed number ranges available (described above) by NHS and government agencies.

***Should NHS 24 not be seen as an emergency service? If not, why not?***

- Again, this is a matter outside of Orange's control and is ultimately something for Government to decide upon but we assume that the main reason for having this number is to distinguish it from emergency services and reduce the burden on emergency services. Therefore, it seems likely that it was designed not to be seen as an emergency service.