

17 December 2009

Franck David
Assistant Clerk to the Public Petitions Committee
The Scottish Parliament
TG.01
Edinburgh EH99 1SP

Dear Mr David

Petition PE1285

Thank you for your letter of 4 November, 'Consideration of Petition PE1285', discussing NHS24. I reply on behalf of my Chief Executive as Head of Public Affairs for Vodafone UK.

Does it agree that calls from mobile phones to NHS 24 should be free of 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?

The commercial model and interconnect

There is a real cost to Vodafone for calls made by its customers to an 0845 number. In addition to the substantial network, IT and marketing cost we have to recover from call charges generally, in the case of 0845 Vodafone faces an additional 'interconnect charge', which is what one telecoms operator has to pay to transfer calls onto the network of another operator. The cost of allowing its customers to access an 0845 number is significantly higher for a mobile operator than it is for a fixed operator.

Ultimately the cost of calls is paid for by consumers and it is in that context that mobile operators set their retail prices in a fiercely competitive market. According to Ofcom, the UK has one of the world's most competitive markets and its most recent information shows prices and consumer spend on mobile communications continues to fall, whilst usage continues to increase¹.

Revenue share on 0845

An 0845 number is what is described as a 'revenue share' number. This means that the organisation that holds the number generally receives some form of income from the calls received (either in the form of revenue or services). Revenue share arrangements are commercially negotiated between the networks hosting the 0845 number and the end-user customer. Vodafone is not privy to the precise arrangements in the case of NHS24, but typically some of the revenue received by the host network goes towards funding the service; revenue that would have to be recouped elsewhere in the event of a free-to-caller service.

The use of a revenue sharing 0845 number is a choice. The result of this choice is that the revenue share payments are reflected in a relatively high price that Vodafone has to pay to operators such as BT or Cable & Wireless when its customers call NHS24.

¹ 'The Consumer Experience – Research Report 09, Ofcom 2009,
<http://www.ofcom.org.uk/consumer/2009/12/savvy-consumers-seeking-better-deals/>



030 public sector number

Ofcom has created an 030 number range specifically for the use of public sector bodies. All mobile operators charge 030 numbers in the same way as they would charge 01 and 02 (i.e. calls to these numbers are included in contract customers' bundles of minutes). Though a move to 030 would not make the calls to NHS24 completely free-to-caller it would generally result in lower call charges, especially for those customers using 'in bundle' minutes.

The revenue share commercial model operating on 0845 relies on networks hosting 0845 numbers making charges to originating networks such as Vodafone that are ultimately borne by our mobile customers. Given the availability of alternatives for the public sector, Vodafone does not see it as appropriate for mobile operators to bear the costs of funding revenue share.

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

This is ultimately a call for Government within the prevailing legal framework, rather than communications providers. In reaching a view on this however, the Committee might want to look at the DirectGov definition which suggests that an emergency should be seen as a critical or life-threatening situation². In the event of an emergency one should call 999 or 112, which are the two numbers for the emergency services. In the event of an emergency one should not dial NHS24, which would suggest that it is not an emergency service.

I do hope that you have found these comments useful.

Yours sincerely,

A handwritten signature in black ink that reads "Emma Wilson". The signature is fluid and cursive, with a large initial "E" and "W".

Emma Wilson
Head of Public Affairs, Vodafone UK

² Directgov 'What is an Emergency',
http://www.direct.gov.uk/en/HealthAndWellBeing/HealthServices/AccidentsAndEmergencies/DG_10036784