

Response to the European Commission's Consultation on:

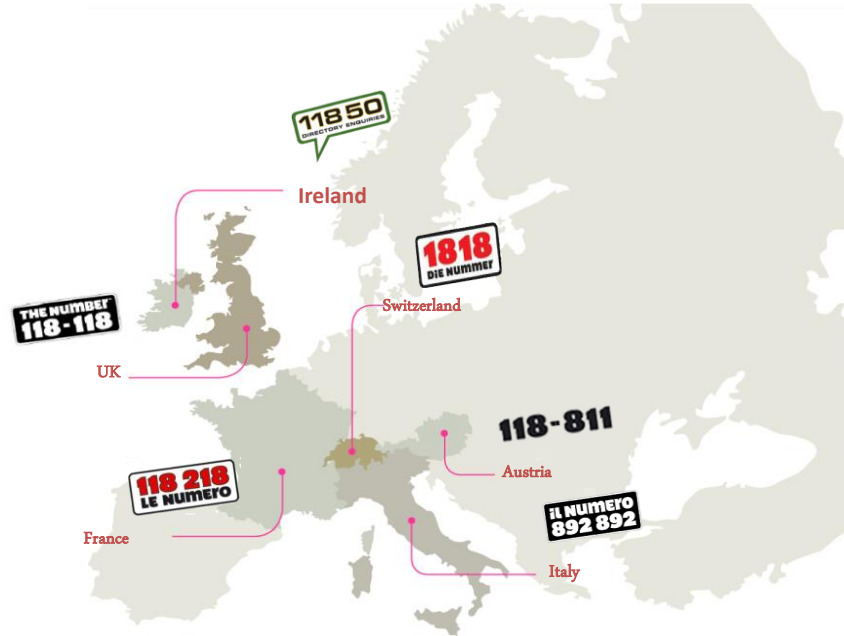
FUTURE EU 2020 STRATEGY



THE NUMBER

INTRODUCTION

The Number is the largest provider of directory enquiries services in Europe with operations in 5 EU Member States and Switzerland.



EXECUTIVE SUMMARY

The Number welcomes the opportunity to comment on the European Commission's consultation on its Future EU2020 Strategy (hereafter "the Consultation"), and fully agrees with the statement that "Europe should tap fully the potential of the digital economy", an economy in which competitive value added services play a key role.

Since liberalisation in the directory services market started in Europe, the Number has been at the forefront of delivering innovative directory-related services and we want to continue to be able to help our customers make sense of an increasing complex digital world.

However, without proactive intervention by the European Commission to ensure the ongoing availability of value-added services such as ours we are concerned that the upcoming network transitions may be used by network operators to restrict access by their customers to third party value-added services to the overall detriment of a vibrant digital economy in Europe. ¹

In particular, we believe **four specific principles should be enshrined in Europe's Digital Agenda, which should form an integral part of the EU2020 Strategy, moving forward:**

- **Competition at all levels** (infrastructure and services) and on all platforms (legacy/NGN, fixed/mobile) must be supported through principles of open access operating on public communications networks.
- **Digital inclusion** and slow adopters should not be forgotten. Voice directory enquiries solutions (DQ) go beyond "search" engines that offer a breadth of automated approximate solution. DQ offers a human-powered "find" service to find the one answer customers want within a minute.

PRINCIPLE 1 - COMPETITION IS CRUCIAL AT ALL LEVELS OF THE ECOMMUNICATIONS VALUE CHAIN (I.E. INFRASTRUCTURE, SERVICES, CONTENT AND APPLICATIONS)

It is essential for independent content, applications and service providers to have fair and open (i.e. non-discriminatory) access to both fixed and mobile networks, including in the Next Generation environment. Without this, competition is threatened and consumers suffer through less innovation, less choice and service availability, and increased prices.

Increasingly, consumers will move seamlessly across converged platforms. They must be able to access services and applications on the move without finding their access restricted or hindered , be it on the basis of the technology or network they are using, or because they are faced by excessive prices. Equally, technology neutrality must be upheld and regulatory norms should apply regardless of the platform and/or technology used.

¹ This was emphasised, for example, in the UK, where the government stated in its Digital Britain Report that *"A vibrant digital economy requires that independent value-added services can be delivered across digital platforms. Where this applies to voice services (such as directory enquiries) this might require Ofcom to mandate wholesale connection rates for operators with significant market power, including where the provider is shifting from one technology to another. It might also require a more active regulatory approach to ensure that services such as directory enquiries are kept relevant to consumers' expectations, and we support moves in Europe to ensure that requirements can be put on a wider range of operators to provide directory information to DQ service providers."*

Consumers want to access and use applications and services that work. They do not care about the technologies and regulations that underpin them. The Commission’s policy must focus on how to enable compelling content, applications and services to be available from devices of any kind, and require policies that achieve that goal. Digital network providers should be encouraged to open their networks to innovation and competition to ensure the maximum chance that consumers are provided with seamless, engaging services as rapidly as possible.

Policies of this kind will encourage a demand-led approach driving uptake of Digital services and platforms by ALL consumers to drive economic and social benefit for Europe. This will also avoid confusion and disengagement. It is important for the Commission to establish ‘innovation through choice’ as a clear policy and regulatory objective.

PRINCIPLE 2 - DIGITAL INCLUSION: SLOW ADOPTERS MUST NOT BE FORGOTTEN

It is an important policy objective to ensure that consumers who do not rapidly take up further use of Digital services – the digitally dis-enfranchised (and often socially disadvantaged) - do not lose out and find core services diminished or unavailable whilst the urban digerati move to take advantage of the newest and latest technology . The continuity of legacy services to the entire European population is important until a high threshold of consumers can be shown to be comfortable to use alternative solutions. Voice directory enquiries solutions (DQ) go beyond “search” engines that offer a breadth of automated approximate solution. DQ offers a human-powered “find” service to find the one answer they want within a minute, and will therefore continue responding to specific needs across time.

Failure to do this will marginalise swathes of consumers who will end up with increasingly restricted access to key communications services, instead of achieving extended access to services. Those affected negatively are likely to be disproportionately made up of older people, and those on the lowest incomes (i.e. those unwilling, or unable to afford to ‘upgrade’). Services included in the Universal Services Directive (e.g. Directory Enquiries and Emergency Services) need special consideration to avoid excluding these groups of consumers from the benefits of communication services.

We thank you in advance for taking consideration of these views. Feel free to contact Nik Hole, Executive Director, Government and Business Affairs – Europe for The Number, by phone (+44 7973 748952) or email (nik.hole@118118.com) should you need further information.

*

* *