

0871 Pre-Consultation Response

Name: WITHELD by the Consumer

Company: n/a – a end consumer

Consultation Answers:

Q1. n/a

Q2. n/a

Q3. n/a

Q4. The primary use of 0871 numbers is the revenue sharing and the reasons why many companies are using 0871 numbers instead of 09x PRS numbers which were specifically designated for revenue share is to avoid being regulated by yourselves, avoid the safeguards that are incorporated into 09x numbers and avoid allowing the end consumer to know they are ringing a premium rate number.

Therefore, a company using 0871 can earn revenue without having to clearly indicate the cost of the call and can keep us in queues longer to earn more revenue knowing that there is nothing us consumers can do.

Q5. n/a

Q6. As mentioned in my response to Q4, 0871 numbers are used specifically to avoid the safeguards offered to end consumers via existing 09x numbers. The main one is waiting times where it can be known to spend over 30minutes in a queue on 0871 numbers whereas on an existing 09x number us consumers wouldn't get charged until we speak to an operator therefore queuing for 30minutes is not a detriment to us but allowing call queuing in anyway, shape or form would at the expense of us consumers which would be a detriment to us.

This is why introducing a requirement to prevent us consumers being charged for the call until answered (like existing 09x numbers) is the safest and best way to ensure protection for us consumers and minimising consumer detriment.

We have to think ahead and realise that when 0870 numbers lose their revenue share, companies will most likely start looking for alternative ways to earn revenue from the call and the next highest revenue earner is an 0871 number.

Q7. Applying a “soft-touch” will just cause more detriment at the expense of consumers unless its made a regulation or legal in some other way. There should be no “voluntary” guidelines, etc as evidence as proved these do not work and all that happens is that years on after years of consumer detriment do you then have to go back and enforce proper legal codes of practice/regulation. This is currently being done now by Ofcom with regards to broadband MAC issuing. Although not related to this consultation I've used it as an example of “voluntary” measures that haven't worked at the expensive of thousands of consumers for which Ofcom now realise.

Q8. 0871 numbers should be advertised in similar formats as existing 09x numbers - along the lines, "Calls cost 10p/min from BT landline. Calls from other networks and mobiles may vary."

This is specifically important because 0871 (like 0870) are known to many consumers as 'national rate' and even some TV adverts recently advertised an 0871 number as a 'national rate'. This is obviously misleading and does nothing for pricing transparency but the problem gets worse because mobile network that currently charge upto 40p/min for these calls all because in most cases the consumer would not be aware of the cost of this number and assume its just 'national rate' so therefore around the same price as a geographical call.

The obvious difference between 0871 and 09x numbers when it comes to making calls from mobiles is that most (if not all) consumers are aware that premium rate numbers begin with 09x and will cost more from a mobile. This is not true for 0871 where many consumers would think that it costs the same as a national rate call.

Due to this, I believe it may be necessary (and it would improve price transparency) to have the operator when they answer the call state something along the lines of, "This call costs 10p/min from a BT landline. Calls from mobiles cost more."

Having the operator say this (especially for 'live' services like call centres) costs the company nothing but would greatly improve call transparency and thereby informing us consumers that 0871 numbers are not 'national' rate. As I said this would cost the company nothing except having them greet us consumers with the call announcement. This is what happens on 09x numbers now and I believe can easily be applied to 0871 numbers without costing companies loads of money. In fact, if anything, it would cost us consumer a few pence (from a landline) whilst the operator informs us of the call charges but this few pence is worth it to ensure everyone ringing is fully aware of the call charges involved.

Q9. What difference is there between following the same guidelines/regulations for price transparency on 0871 numbers like there is on 09x numbers? For example, if a company using a premium rate number advertises in the yellow pages then they would have to state the cost of the call. Similar thing for radio, where quizzes/phone-ins, etc that use 09x numbers all state the cost of the call from a BT landline. So therefore it is possible for companies to do the same and follow the code of practice on call transparency for their 0871 like they would have to for 09x numbers.

I can't see the logic behind saying that just because a company chooses to use a revenue generating 0871 doesn't have to mention the cost of the call but they do if they were to choose an 09x number. What's the difference apart from the cost of the call?

In fact, and as mentioned earlier, the cost of these calls are greatly misunderstood and often referred to as 'national rate' (even by telecommunication providers) so I believe it's essential to ensure consumers are fully aware of the cost of the calls at least from a BT landline and that other costs may vary from a mobile.

Q10. n/a

Q11. Maybe an annual, quarterly, or monthly fee should be charged instead of the current method of taking a cut of the call per minute.

Q12. I believe the public has a right to know of any number that is a premium rate number whether specifically 09x or not. To hide the fact that 0871 numbers are not premium rate means you are specifically misleading consumers and possibly causing consumer detriment. This is especially true with the case of 0871 as many consumers, companies and telecommunications companies still refer to them as 'national' rate.

Q13. n/a

SUMMARY

You already state in your pre-consultation that you received over 23,000 number checks on 0871 alone in the period of Oct '05 to May '06 (8 months) and over 800 phone calls. Therefore you are already be aware of the lack of consumer awareness of these numbers and the detriment they are causing by basically being a premium rate number without ANY safeguards whatsoever.

You state in your pre-consultation that you believe the most detriment would be caused by live 'chat' services (ie not calling centres), etc but I disagree. Live 'chat' services like adult, etc are all on 09x numbers that I've seen.

The most use of 0871 numbers is by companies operating calling centres (customer services, tech support, etc) and therefore consumer detriment is more likely in these areas and not so much in the very few (I could only think of one) live chat services that operate as many use other NTS number ranges like 0845, etc instead.

The only one live chat service I can think of is a terrestrial TV show called "The Wright Stuff" (or something along those lines) which operates a 0871 number. I agree this would have consumer detriment but in comparison to call centres and the queues possible on these lines, I believe consumer detriment is more likely in the call centre environments with being charged whilst waiting for them to answer (call charging whilst queuing).

There has been a lot of press about call waiting times and the most recent was from the Guardian, <http://www.guardian.co.uk/airlines/story/0,,1873289,00.html>, where a consumer ringing a EasyJet's 0871 number had to wait 20minutes before they could answer. I realise that sometimes call queues can be unpredictable but they still exist and this is where I feel the most consumer detriment will happen. This press story is just one of many.

Another recent news article, http://www.thisismoney.co.uk/news/special-report/article.html?in_article_id=412999&in_page_id=108, I noticed a ICSTIS spokesperson quoted as stating that, "ICSTIS is generally suspicious of any delay longer than 15 seconds." So therefore going by your spokesperson I would assume you agree then that consumer detriment is most apparent on calling centres where we have to pay to wait to be answered and trust me that delays are a lot longer than 15 seconds. I've personally experienced delays lasting nearly 30minutes.

Personally, given a choice of ringing a company on a premium rate 09x number costing 10p/min and ringing them on a 0871 number costing the same then I'd ring the 09x number. Simply because I know that I wouldn't be charged for being kept in their queue thus saving me what initially can be fortune and therefore causing less consumer detriment.

I believe in most cases the amount of time spent on the telephone to companies using 0871 is being held in a queue. In my experience most phone calls, once answered, are over in a few minutes.

Emailing companies these days either results in no reply whatsoever or them not reading my emails correctly and replying back with something that isn't related to or answer what my original query was, or even as far as them emailing back and asking that I ring them.

At the very least 0871 numbers should have:-

- **Call charging whilst we are in a queue is prohibited just like 09x numbers.**
- **0871 numbers to be advertised same as 09x numbers (clear and transparent and not put 'national rate' that some companies have been putting)**
- **When call answered we are informed that the call costs 10p/min**

Anything less then there will be no different than how they work now where call queuing is allowed and the cost of the call isn't published (in most cases).