



## **INWG Initial Response to ICSTIS' regulation of 0871 (NTS) services: A pre-consultation paper seeking input into ICSTIS' implementation of Ofcom's objectives for regulation over 0871 services**

### **Introduction**

INWG is the Intelligent Number Working Group representing citizens, consumers, users and providers of Intelligent Numbering services focused on promoting the environment for making ever better service and information delivery available to all.

INWG has been heavily engaged in recent consultations with Ofcom regarding NTS, the Numbering Review et al and welcomes the opportunity to be involved with this pre-consultation by ICSTIS.

INWG has until now had no formal or informal dealings with ICSTIS. As a result of this lack of engagement, INWG has only very recently received notification of this pre-consultation and as such has not been able to consult across its membership in advance of today's deadline.

This paper therefore should not be considered as INWG's detailed response to this pre-consultation but rather a confirmation that INWG wishes to engage closely with ICSTIS on the very important and far reaching implications of the Ofcom derived regulatory requirements regarding the 0871 number range.

To this end, INWG would welcome an early opportunity to meet with ICSTIS to discuss the current and future issues in depth that we may be the better enabled to inform our membership and request their responses.

INWG however would like to take this opportunity of making a few initial observations that may assist in the construction of the major consultation ICSTIS intends to undertake in February 2007. Rather than responding to individual questions per se, we would like to raise the following points and questions.

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## Considerations

In NTS: A Way Forward, statement dated 19 April 2006, Ofcom declared that following consultation, ICSTIS would be requested to design a regulatory framework under which the 0871 telephone number range might be operated. At the same time Ofcom declared that 0870 numbers would, after an interim period, no longer operate under the “NTS Condition” environment, and that not only would charges be linked to geographic number rates but that revenue-sharing would similarly effectively cease. As a result of these decisions, Ofcom’s recommendation to organisations wishing to remain within a revenue-share environment should migrate to 0844 and 0871 number ranges.

The net effect of this advice is to make the answers to Questions 1, 2 and 3 of this pre-consultation complex and interconnected, as of course the current characteristics of the 0871 number range may be completely altered as this migration takes effect. Many of the concerns that prompted Ofcom’s deliberations regarding 0871, and which in turn led to this proposed regulation, may now prove to be less clear cut and so INWG recommends an evolutionary approach to creating this new regulatory environment based on ongoing research and market intelligence. We trust that the consultation in February 2007 will address the structure and characteristics of the marketplace as of 2007 and moving forward, and not be based upon legacy data and obsolete regimes consulted on two years previously.

In its responses to NTS: A Way Forward, INWG was deeply concerned about the impact on the whole 08 number range of an element thereof (0871) being regulated by the Premium Rate Services Regulator. INWG is delighted that Ofcom accepted those concerns as valid and notified them to ICSTIS. We are gratified that ICSTIS has referenced these concerns in this pre-consultation but would like to reiterate that our concerns referred to the impact on the entire 08 number range and not just 0871. We would like to meet with ICSTIS specifically regarding these concerns as the citizen-consumer interest must be defended.

INWG is slightly confused by the import of Question 6 in that we are unclear as to the powers under which ICSTIS would feel it could, and indeed should, regulate Quality of Service provision to consumers through the range of calls centres in operation today. INWG would like to explore with ICSTIS where the line appropriately can be drawn between communications’ regulation and normal business operations.

INWG is fully committed to the clear, consistent and coherent price transparency that we recognise underpins true consumer choice. We recognise the challenges in creating such transparency and look forward to working with ICSTIS to help achieve this aim.

To drive our memberships’ understanding of the deeper issues so they will be better able to contribute to the debate, INWG would welcome an early meeting with ICSTIS.

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