

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	Ian Lowden
Representing (self or organisation/s):	ADP Supplies Ltd

Q1: Do you agree with our proposal to create a Statement of Application for the 0871 number range? If not, please provide your reasons and alternative suggestions.	
Yes in principal – but please see my comments below as you will need to make some changes	
Q2: Do you agree that the current application of Section 1 of the Code is appropriate to apply to the 0871 number range? If not, please give your reasons.	
As Q1	
Q3: Do you agree that this is a fair and proportionate application of the network operators' due diligence requirements to the 0871 number range? If not, please give your reasons. ICSTIS would welcome further information regarding quantification of costs.	
Yes	
Q4: Do you have any further information and evidence regarding usual payment times? Additionally it would be helpful to have responses that indicate to what extent Service providers rely on immediate payments from network operators to cover their operational costs.	
n/a	
Q5: Do you agree that this is a fair and proportionate application of a delayed payment mechanism to the 0871 number range? If not, please provide your reasons.	
Yes	
Q6: Do you agree that the current application of Section 3 of the Code is appropriate to apply to the 0871 number range? If not, please provide your reasons.	
0871 numbers ARE premium rate call numbers (i.e. it costs far more to call one than it does to call an 01 / 02 number on most call plans & calls do not come out of inclusive minutes). Service Providers must be obliged to hold (and publish) a normal landline number alongside an 087 numbers (irrespective of 0870 or 0871)	
Q7: Do you agree that the current application of Section 4 of the Code is appropriate to apply to the 0871 number range? If not, please provide your reasons.	
See Q1	
Q8: Do you agree that it is fair and proportionate to apply ICSTIS' current application of the prior permission regime under Section 5.1 of the Code to the 0871 number range? If not, please provide your reasons.	
Yes	

Q9: Do you agree that Option D is a fair and proportionate application of the undue delay requirements in paragraph 5.4.2 of the Code to the 0871 number range? If not, please provide your reasons and alternative preferred option. Additionally, please provide details of any other options you feel may be appropriate for ICSTIS to consider.

Yes

Q10: Do you agree that this is a fair and proportionate application of the pricing information requirements under Section 5.7 of the Code to the 0871 number range? If not, please provide your reasons.

No – the same concerns re 0870 numbers apply to 0871 numbers – and organisations will simply switch from 0870 to 0871 & charge customers more rather than less.

0845 numbers could easily be used instead of 0871 for advanced network features – there's no need for 0871 at all.

Most companies would not risk moving to 09xx numbers as people recognise the rip off numbers. Currently few people realise the real cost of calling 0870 / 0871 numbers.

I've just had to call babyBMI to resolve a problem of their causing – they claim they are unable to return your call so you have to keep calling them ON an 0871 number – to resolve their mistake. This pays for their telesales operation. Inefficient organisations should not be allowed to hide behind a premium rate number to cover their costs. What makes matters worse is that they run a long (minute +) message and only then give you the options to dial (you can't press the correct button until the lengthy intro is finished) & then there is no option to return to the main menu if you hit the wrong button – you simply have to re-dial. This is all about revenue generation & nothing about customer service.

If 0871 numbers are allowed, then their operators should:

- 1) Give you the menu option within 5 seconds of the call starting – and be limited to 10 seconds of menu options (inc all sub menus)
- 2) Be forced to answer the call with a live person ready to handle your call within 5 rings (not like a hospital triage unit where they see you in 10 minutes but then have to sit around for an hour waiting for someone qualified to handle your case)
- 3) Offer to call you back (and do it) if the call has lasted more than 2 minutes

Q11: Do you agree that it is appropriate to allow a three-month implementation period, as outlined above?

Providing that a quick announcement is made by BT before the call is routed that the call will cost you 10p / minute & you have the choice of hanging up (before being charged) or carrying on the call

Q12: Do you agree that this is a fair and proportionate application of ICSTIS' scope of regulation in respect to content of services provided on the 0871 number range? If not, please provide your reasons.

Yes
Q13: Do you agree that the current application of Section 6 of the Code is appropriate to apply to the 0871 number range? If not, please provide your reasons.
As Q1
Q14: Do you agree that the current application of Section 7 of the Code is appropriate to apply to the 0871 number range? If not, please provide your reasons.
As Q13
Q15: Do you agree that the current application of Sections 8 to 11 of the Code is appropriate to apply to the 0871 number range? If not, please provide your reasons.
As Q13
Q16: Do you agree that this is a fair and proportionate application of the funding model in Annex 1 of the Code to apply to the 0871 number range? If not, please provide your reasons.
Yes
Q17: Do you agree that this is a fair and proportionate method of collection of the funding levy to apply to the 0871 number range? If not, please provide your reasons.
Yes
Q18: Do you agree that a minimum payment amount from each network operator should be £500 per annum? If not, please provide your reasons.
Yes
Q19: Do you agree that it is not appropriate for ICSTIS to create and promote a separate brand for regulation of the 0871 number range? If not, please provide your reasons.
Provided that it is classed as a premium rate call & organisations are not allowed to call it a "national rate" (or similar) call – which I have noticed on many instances (same rule should apply to 0871)
Q20: Is there any other way in which ICSTIS' regulatory framework should be amended or otherwise so as to regulate the 0871 number range in a way that is fair and proportionate?
Organisations should not be allowed to display their 0871 number on outgoing calls – they must use a number that would normally be included within an inclusive minutes package on landlines & mobiles (or worst case an 0800 / 0845 number)
Q21: Do you agree that this is an appropriate wording for a Statement of Application based on ICSTIS' proposals? If not, please provide your reasons and alternative wording.
Yes