

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	
Representing (self or organisation/s):	

<p>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.</p>
<p>yes. so far as my other responses that follow do not conflict it</p>
<p>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.</p>
<p>yes, so far as my other responses that follow do not conflict it</p>
<p>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.</p>
<p>yes</p>
<p>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.</p>
<p>no</p>
<p>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.</p>
<p>yes</p>
<p>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.</p>
<p>Yes, but one proviso. section 3 of the code says service providers should also hold non-premium rate UK customer service numbers but that you currently think 087x numbers are ok.</p> <p>This is a total contradiction - 0871 will be premium rate numbers not regulated by ICSTIS.</p> <p>It totally defeats the point of the service provider not holding a non-premium rate number but yet allow them to hold an 0871 contact number.</p> <p>service providers MUST be required to hold a geographical or 0870 number and NOT 0871 numbers.</p> <p>I have little income and simply cannot afford to have money extorted like this.</p>

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.

yes, so far as my other responses that follow do not conflict it

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.

No.

You say you have received significant complaints concerning 0871 numbers.

Ofcom has and is currently investigating scams on 0870 numbers.

Once 0870 stops generating cash for these organisations and companies, they'll , just migrate to 0871. It won't cost them much and they will still be extorting more cash from callers. Scam people and companies will do the same.

you're not doing anything about people being held in a queue and paying these extortionate rates. They have to be tackled too, especially for 0871 numbers that are used for customer complaints.

ICSTIS has said that many companies/organisations will use 0871 not for the revenue share (can be as much as upto 6p/min) but for the advanced network features.

If this was true then companies/organisations would use other lower-rate non-geographical numbers like 0845 which offer the same network features except in most cases revenue sharing isn't passed to the company - they don't make easy money in other words – as the cash is retained by the service provider to pay for the advanced network services.

so the reason 0871 is used by these organisations is revenue share and the advanced network features - but the difference is that most consumers don't know that 0871 is premium rate, and the company's making cash by keeping them on hold for 20 or more minutes. This happens again and again because these numbers incentivise the company NOT to deal with concerns complaints an queries, as the consumer then ahs to keep phoning in.

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.

Yes, except that because consumers don't know that 0871 is a premium rate number (unlike 09xx where they do), companies/organisations should also be obliged to say when they answer the call that "calls will cost 10p/min from a BT landline (other providers may charge more)."

at least people would know then they were about to be paying heavily for the privilege of raising a query with the company.

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

yes

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.

yes so far it's not conflicting with any other answer here.

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.

yes so far it's not conflicting with any other answer here.

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.

yes so far it's not conflicting with any other answer here.

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.

Yes, so long as ICSTIS doesn't try and hide the reality that 0871 is a premium rate number (albeit lower amount than 09x) and that Communication Providers (CPs)/Service Providers do not advertise the 0871 number range as 'national rate'.

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?

To discourage scams with missed phone calls/silent calls, ICSTIS should make companies/organisations using an 0871 does not display via CLI (Caller Display Identity) their 0871 number.

Instead, companies/organisations should use freephone or lower-cost number ranges.

This would also save Ofcom having to investigate missed calls/silent calls (whether deliberate or not) as this is potentially in contravention of current Ofcom rules. Currently, Ofcom rules state that companies/organisations making phone calls (sales, etc) should not display any number costing more than the rate of an 0845 on CLI.

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.

n/a