

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	Charlotte Barrow
Representing (self or organisation/s):	Self (self-employed)

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.	
In principle, and subject to my comments below, yes.	
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.	
Ditto	
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.	
no	
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.	
Yes...BUT section 3 of the Code says that service providers also hold non-premium rate UK customer service numbers, but that you currently think 087x numbers are all right; that doesn't make sense, because 0871 will be premium rate numbers. If the service provider has an 0871 number, then they've got a premium-rate number...so I would ask that service providers be required to hold a geographical or 0870 number and NOT 0871 numbers.	
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.	
In principle, and subject to my other comments etc, yes.	
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 and Ofcom have both received significant complaints concerning 0871 numbers, and Ofcom is currently investigating scams on 0870 numbers. Once 0870 loses its revenue share, most companies/organisations are expected to migrate to 0871 – so will scam artists!

ICSTIS says that many companies will use 0871 for the advanced network features (rather than for the revenue share) – but in that case, why don't they use lower-rate non-geographical numbers (e.g. 0845) which I understand offer the same advanced network features...but (and it's a big but), in most cases revenue sharing isn't passed to the company but is instead kept by the service provider to pay for the advanced network services. Isn't it obvious that the point of using 0871 (for the companies) is the share of revenue??

Until recently I didn't know that 0871 is a premium rate number, and I am sure I am not alone. Whereas I do know that the 09x numbers are, and I avoid them.

It seems that under your proposals, the company will be earning revenue when I am held in a queue...I am self-employed, so making calls on my own time and at my own cost, and I often have to give up because of the time factor (i.e. it takes so long to get through): to be paying a premium rate so that the company can earn some money is adding insult to injury! And hardly an incentive to them to employ more staff.

Any company using an 0871 number should be required to say where the caller is in the queue and to give an estimate of how long one will have to wait; the caller should also be advised of the cost of the call from a BT landline.

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.

See above; it should be made clear that it is a premium rate number and the cost from a BT landline should be given – briefly and succinctly!!

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.

In principle, and subject to my other comments etc, yes.

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.

In principle, and subject to my other comments etc, yes.

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.

In principle, and subject to my other comments etc, yes.

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.

A qualified yes: it must be clear and transparent to all that 0871 is a premium rate number (perhaps a term such as 'lower premium rate' could be used to distinguish the rate from the 09x numbers) and you must ensure that Communication Providers/Service Providers do not advertise the 0871 number range as 'national rate' (some Communication Providers are currently doing that, as I know to my cost from my telephone bill).

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?

ICSTIS should forbid companies using an 0871 number to display it via CLI (caller line identity) in order to discourage the scams which involve missed 'phone calls and silent calls. For display, freephone or lower-cost number ranges should be used.

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