

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	Dr W B J Blake
Representing (self or organisation/s):	Self (consumer and IT consultant)

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 general – but please see my other points below.	
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.	
Yes – although I have reservations about the use of 0871 numbers in general as below.	
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.	
<p>Yes, but I think that using 087x numbers for revenue sharing is a mistake. The majority of consumers do not realise that these numbers are relatively high priced. I am very concerned to see many companies are already switching to 0871 numbers with the changes coming for 0870 charging. This is simply to protect their revenue and to find ways to extract more revenue from the public. This system encourages practices such as long recorded messages, delaying answers or access to services, just to make revenue. All revenue sharing services should in my view start with 09 as the public do (mostly) understand what happens when they dial an 09 number. That is not the case for 087x numbers.</p> <p>I recommend that service providers be required to hold and publish geographical numbers, not 0871 numbers. However, my other answers also give my views on a number of matters assuming 0871 numbers continue to be used in the current way.</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 – but see my other answers.

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 admit that you have received complaints about 0871 numbers as has OFCOM and I understand that OFCOM is currently investigating the abuse of 0870 numbers. That abuse will surely apply to 0871 numbers once companies migrate to them. I am concerned that you do not propose to do anything about call queuing – which is not in the consumer interest. Many companies and organisations deliberately encourage queuing to earn revenue.

I do not agree that companies will 0871 for advanced network features – they will do so for the revenue share (which can, I believe, be as much as 6p/minute). Advanced advanced network features are available on other lower costs numbers.

It is reasonable to charge customers for additional services (for example, chargeable technical support) but not for the basic services like enquiring about the status of a late order. These chargeable services must be transparent to customers – which is not the case at present.

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 since consumers will not be aware that 0871 is a premium rate number (unlike 09x) it should be mandatory to have an immediate announcement of the cost of the call as soon as the call is answered. eg "calls will cost 10p/min from a BT landline (other providers may charge more)" or similar.

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, but only in the context of my other answers.

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, but only in the context of my other answers.
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, but only in the context of my other answers.
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 makes it clear that 0871 is a premium rate number and that Communication Providers (CPs)/Service Providers do not advertise the 0871 number range as 'national rate' as some CPs currently do.
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 ensure that companies/organisations using 0871 display via CLI (Caller Display Identity) a low cost number for call back, or number withheld. 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, which 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