

A response to "0871 Services: An ICSTIS Consultation - A Public Consultation Issued by ICSTIS on 25 April 2007"

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According to ICSTIS, the UK's premium rate market is the world's largest, and no wonder. The ineffective regulation of this so-called industry means the United Kingdom is the number one choice for those wishing to inflict scams and fraud on a largely unsuspecting public with the full knowledge that neither ICSTIS nor Ofcom will provide any significant degree of consumer protection. In no other country is the general public expected to call these wretched premium rated 0871 numbers in order to conduct day-to-day business with service organizations, public bodies and government services only to be placed in seemingly endless queues while the profits for the called party rack up. Whilst ICSTIS has its own definition of premium rate numbering, a true definition that is relevant to the public includes all 084 and 087 numbering. A former director of communications at Ofcom even admitted that 084 and 087 numbers were premium rate in all but name.

Once again, here we have yet another consultation that simply misses the point. The public is not interested in the detail of the regulation of 0871 numbers – it simply doesn't want these numbers in the first place. Ofcom has consulted on numerous occasions regarding the wider NTS regime, including a recent consultation that yielded an unprecedented engagement with the general public with around one thousand submissions. Virtually every response indicated that the public is fed up with the proliferation of 087 and 084 numbering which are charged at premium rates in most instances. The outcome of this specific consultation was that Ofcom took some action with respect to the most visible problem, i.e. 0870 numbering and absolved itself from any responsibility regarding 084 and 0871 numbering, passing the latter over to ICSTIS for further action, consultation and delay.

A recent petition to the government to require geographic alternative numbers to be available for all 087 numbering, which attracted over 43,000 signatures, provides further evidence that the public has no appetite for 0871 numbering yet ICSTIS simply continues to try to regulate rather than address the real issue.

For those of us who live overseas, the use of 087 numbering is a nightmare. The ability to terminate calls from overseas is often impossible, and even where it can be achieved, the cost is significantly greater than that for calling a geographic number. Ofcom's NTS proposals mean that there will be a shift from 0870 to 0871 and to 0844 so that revenue is maintained. Both 0871 and 0844 are even more difficult to terminate from overseas than either 0870 or 0845, yet we still see the utter stupidity of organizations that can reasonably expect to receive international inbound calls using 0871 numbering – a range that Ofcom and ICSTIS both admit can be extremely difficult to call from overseas. Where in this consultation is the problem of international inbound calls to 0871 being addressed?

ICSTIS has an appalling track record in terms of regulating its existing remit of premium rate numbers and the addition of this extra number range will simply compound its ineffectiveness. A complaint that I submitted over a year ago, relating to an unsolicited premium-rate SMS has still to be resolved. The wholly inappropriate advice given to me by ICSTIS was that, in order to obtain a refund, I would have to

contact the fraudster, which operates its customer service line using a revenue-generating 0871 number that I cannot actually call from the United States. What a ludicrous situation for a regulator to adopt. Its code of practice favors the PRS industry. Its mechanism for consumer redress and refunds is non-existent. It puts the onus on the victims of fraud to contact the fraudsters, who amplify the problem by using further premium rate numbers. Where is the consumer protection from ICSTIS? The truth is that ICSTIS is only interested in the PRS provider, setting many hoops and hurdles for the typical consumer to navigate in order to resolve problems.

In conclusion, ICSTIS and Ofcom have failed to curtail the endless scams that seem to exist within the UK numbering framework, whether it be related to 09, 087, 084, 070 or reverse-billed premium SMS. The two organizations are anti-consumer and pro-industry. The UK telephone network is infested with premium rate 084 and 087 numbers that coerce the public into paying unnecessary charges simply to make everyday calls and hide the true cost of such calls by using the well-entrenched local and national call rate descriptors. The UK consumer is able to call a bank in New Zealand or the United States at a much lower cost than to call one in the consumer's own UK town and as soon as ICSTIS realizes the stupidity of this, then perhaps it can begin to regulate. When a government agency, the DVLA, is raking in eighteen million dollars of revenue simply through receiving customer calls, then something is morally wrong, however ICSTIS and Ofcom simply continue promoting the failed and flawed NTS regime. It is time for these two hopeless organs of the telecommunication industry to be wound up and replaced with a true champion for the consumer. We really are fed up with being ripped-off through weak regulation of the UK telephone industry. It is time for change – abolish 0871 and those that need 10p/min revenue can use a true premium rate 09 number at an identical rate.

See also:

Telephone Numbering: Safeguarding the future of numbers

Response submitted by Ian Bottom (Florida, United States, May 2006)

<http://www.ofcom.org.uk/consult/condocs/numberingreview/responses/BottomIan.pdf>

Number Translation Services: A Way Forward

Response submitted by Ian Bottom (Florida, United States, November 14, 2005)

http://www.ofcom.org.uk/consult/condocs/nts_forward/responses/af/bottom.pdf

Providing citizens and consumers with improved information about Number Translation Services and Premium Rate Services

Response submitted by Ian Bottom (Florida, United States, December 4, 2005)

http://www.ofcom.org.uk/consult/condocs/nts_info/responses/bottom.pdf

Number translation services: Options for the future: An Ofcom consultation

Response submitted by Ian Bottom (Florida, United States, December 20, 2004)

<http://www.ofcom.org.uk/consult/condocs/ntsoptions/Responses/inbottom.pdf>

NTS call termination market review: An Ofcom consultation

Response submitted by Ian Bottom (Florida, United States, December 29, 2004)

<http://www.ofcom.org.uk/consult/condocs/ntsctmr/resntcctr/ibottom.pdf>