

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

<p><b>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.</b></p> <p><i>Yes, except where it conflicts with any of my other comments below.</i></p>
<p><b>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.</b></p> <p><i>Yes, except where it conflicts with any of my other comments below.</i></p>
<p><b>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.</b></p> <p>Yes</p>
<p><b>Q4: Do you have any further information and evidence regarding usual payment times?</b></p> <p><i>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.</i></p> <p>n/a</p>
<p><b>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.</b></p> <p>Yes</p>
<p><b>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.</b></p> <p><i>Yes except that it is mentioned that within section 3 of the code that service providers also hold non-premium rate UK customer service numbers but that you currently think 087x numbers are ok. However, 0871 will be premium rate numbers which is evident because they will be regulated by ICSTIS. It seems pointless, therefore to ban service providers from using premium numbers but allowing them to hold an 0871 contact number which they can continue to use as a stealth earner. I suggest therefore that service providers be required to hold a geographical or 0870 number and NOT 0871 numbers.</i></p>
<p><b>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.</b></p> <p><i>Yes, except where it conflicts with any of my other comments below.</i></p>

**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 state that you have received significant complaints concerning 0871 numbers as has Ofcom and at this time Ofcom is currently investigating scams on 0870 numbers. What is to stop companies, organisations and scammers from changing to 0871 and therefore less regulation? *Call queueing is not at all in the consumer interest but only in the interest of companies/organisations using these numbers and something should be done about it. .***

**It has been stated by ICSTIS that many companies/organisations will use 0871 not for the revenue share ( which can be as much as upto 6p/min) but for the advantage of the network features. If this was true then they would use other lower-rate non-geographical numbers like 0845 which offer the same features except in most cases it is the phone company which gets the additional revenue to pay for the service and not the company using the service. Therefore, the primary interest in using 0871 is for the revenue share in addition to the advanced network features available but the difference is that many consumers currently aren't aware that 0871 is premium rate which is why many companies/organisations have already migrated to 0871.**

**Consumers are more aware that 09x is a premium rate and that this would cause many complaints so instead companies have opted for 0871 where they can still make the money but without the consumer knowing that they are in fact ringing a premium rate number with just lower additional costs. According to your proposal they will be able to gain revenue even whilst consumers are held in a queue. It's possible to be held in a queue for over 20minutes when ringing some companies on their 0870 now. This has happened to me when phoning O2 and the passport office for example. This means the company gets over £1 for every call they get that lasts 20minutes just being in a queue. If a company gets many calls like this in a day then this adds up to considerable additional profits for the company or service, not to mention the amount of time wasted by the caller for no good reason! Please remove the incentive to keep callers waiting.**

**My own belief is that companies should be forced to give alternative geographical numbers even if in smaller print. Plenty of people will still use the 087x number but at least they have the choice! At the very least instead of "Your call is important to us" which elicits from me "no wonder if you can keep me waiting and paying for the privilege!", an announcement should be made when first the phone is first answered stating where you are in the queue and how long it's estimated you'll be before being answered. This would allow us consumers to know in advance that they could be a long time and can choose to ring back later, etc. I note that such announcements have dwindled to non-existent in recent years, clearly because it is not in the companies' interests. Some will tell you they are busy and suggest you use the internet or call back but they give no indication of how long you will hold on for until you are answered so you cannot make an informed decision. An announcement service could all be paid for out of the revenue from the call they receive which ICSTIS believes is really only used for network features and not to deliberately gain revenue from the call.**

**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 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)." The financial impact on the companies/organisations using these numbers would be negligible and in fact paid for by the consumer but consumers would be fully aware that they are paying at least 10p/min. Which most are not at present.

**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, except where it conflicts with any of my other comments below.

**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, except where it conflicts with any of my other comments below.

**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, except where it conflicts with any of my other comments below.

**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 fact that 0871 is a premium rate number (albeit lower amount than 09x) Neither should Communication Providers /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?**

**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 Caller Display Identity. To discourage scams with missed phone calls/silent calls, ICSTIS should ensure that companies/organisations using an 0871 do not display their 0871 number which could potentially make them money when an unaware consumer rings back. I am particuaarly concerned that this might affect older consumers who would think it a matter of good manners to respond. Instead, companies/organisations should use freephone or lower-cost number s.**

**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**