

I have been a vehement opposer to 0870 numbers as they are now used, i.e. as a revenue stream, as opposed to the original concept of a non-geographic service providing the number called with many useful options.

Clearly, the 0870 facility has been grossly abused, otherwise there would not have been the public outcry we have seen of late, and I am glad to say I have shouted as loud as I can when the opportunity arises.

The controls to be introduced on 0870 would not be there without good reason, and it seems absurd that, at the same time, we do not curb the way 0871 numbers will be used.

It is folly to assume companies will miss the opportunity, here, when 0870 is more controlled to switch to 0871. If ICSTIS promotes the idea that some kind of conscience will take hold and cause 0870 users to say they take note of public opinion and not switch, then ICSTIS should be abolished and a regulator with a more realistic approach formed. I honestly believe that some of the strands apparently being adopted by your organisation will bring it into great disrepute, if it is not seen to put the public interest first.

The public interest must come first: there should be no attempt to find some middle path fair to all sides, as it is clear that there are thousands and thousands of 0870 users out there who have unscrupulously ripped off the public, and they will be laughing all the way to the bank with a relatively unregulated 0871 service available to bridge the gap in their revenue streams.

0871 numbers are premium rate, and it is folly to attempt to pretend that, by some difference in the definition differences between these and 090, that they are not.

There should be no call queuing whilst being charged: charges should only start when a caller is put through to the human being who can help with their problem. There should be a message on the call if and when charging is to start, with a suitable gap, e.g. 30 seconds, whilst the call remains free, to give the caller the opportunity to end the call if he/she is not satisfied the purpose of their call is to start taking effect. 0871 calls to consumers should never be accompanied by caller display, for the obvious reason that consumers often treat a missed call this way.

Indeed I would go so far as to say that 0871 numbers should leave no trace as missed calls.

Lastly, I plead that your organisation will take such issues seriously, as recent history has proved that revenue sharing calls have been a means of cheating consumers, and have led to consumers being charged, on a revenue sharing basis when this is clearly wrong, e.g./ to customer service departments.

0871 users should ALWAYS provide a geographic alternative, which it should be obliged to give equal attention to.

The reputation of your organisation is at serious risk, here, and this is not a time to pussyfoot around, looking for excuses to please everyone, when any attempt to help 0871 to take the place of 0870, is clearly not in the public interest which is what comes first.

Regards

Russ Clark