

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	Ian Cook
Representing (self or organisation/s):	Self

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 with the exceptions indicated in other answers.	
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 with the exceptions indicated in other answers.	
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, except that within section 3 of the code it is mentioned that the service providers should also hold non-premium rate UK customer service numbers, I disagree that 087x numbers are ok as they are charged at a "Premium" to normal land line call rates as do the 084x numbers. There must be a contradiction here as 0871 (premium rate) numbers will be regulated by ICSTIS. Service providers must therefore holding a non-premium rate number, excluding a 0871 contact number by definition. I suggest therefore that service providers MUST be required to hold a geographical or 0845 number and NOT 087x 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.	
Yes with the exceptions indicated in 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 state that significant complaints concerning 0871 numbers have been received by Ofcom and yourself, and at this time Ofcom is currently investigating scams on 0870 numbers. When 0870 loses its revenue share, most companies/organisations will likely migrate to 0871 and this means scam artists will also do this in major numbers. Unless you propose to outlaw call queuing is not at all in the consumer interest to implement your plans, only companies/organisations using these numbers would benefit from this and it would not be in the customer/consumer/public interest.

It has been stated by ICSTIS that many companies/organisations will use 0871 not for the revenue share (can be as much as up to 6p/min) but for the advanced network features. If this is true then why do companies/organisations not use other lower-rate non-geographical numbers like 0800 or 0845 which offer the same advanced network features except in most cases revenue sharing is not a feature passed to the company by the service provider but is used to pay for the advanced network services. This therefore indicates that the primary interest of using 0871 must be for the generation and increase in revenue share in addition to the advanced network features available. Many consumers, like myself were not and some still are not aware that 0871 are premium rate and that many companies/organisations have already migrated to 0871. Most companies/organisations would not dare move to 09x (not even at 15p/min) because most consumers are aware that 09x are premium rate, this would cause many more complaints, so instead they have opted for 0871 where revenue still exists but with consumer ignorance that they are in fact ringing up a fat profit with a premium rate number (albeit lower amounts) and according to your proposal, being able to gain revenue even whilst consumers are held in a queue; I personally know that British Gas has made money out of me, and many thousands of other customers according to the press, with long call queues of >20minutes in my case on 0845 numbers. From your suggestions it would be possible for people to be held in a queue for over 20minutes when ringing some companies on their 0870 now; this already equates to the company getting over £1 for every call they hold for 20minutes. If a company gets hundreds or even thousands of calls a day then this adds up over the months and year, therefore giving them an incentive to keep callers waiting, even several weeks after British Gas announced it would change its service level I was waiting in queues as long as 25 minutes on several occasions. With the potential of extra revenue possible from 0871 numbers this will be used to fleece customers; therefore legislation would be required to ensure that consumers are not charged for being kept on hold for undue delays, service incompetence or greed. The companies should shoulder the burden of customers waiting, it is down to their inefficiencies after all, if they do not want this then give us a geographical number that we are prepared to pay for. This way the companies will learn to become customer focused and efficient to ensure that there would be no extra financial burden on them.

Most 087x numbers are also used by service suppliers as their sole number, when it is a necessity to contact them for help or service to an item that they have sold us already should be viewed as placing them in a monopoly position with the consumer having no recourse to any other method of contact usually

If we have to use 087x numbers, companies must be made to announce the fact at the start of a call, similar to those used when calling into free phone / toll free numbers in international conference centres – where you are not charged until several seconds after the announcement has finished; including in the announcement the fact that it is a “Premium rate” call, then if you are to be placed into a queue how long it is estimated you will be before the call is answered and the approximate cost; this would allow us as consumers to know in advance the potential delay and allowing us to ring back later without the initial charge each time. This could all be paid for out of the revenue the companies receive from the calls and which ICSTIS believes is really only used for network features and not to deliberately gain revenue from the call, making it a “Cost Neutral” solution.

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.

I would like to see companies pay for an announcement at the start of ALL of their calls, (because consumers will not be aware that 087x are premium rate numbers, unlike 09x where consumer knowledge is much better and that their premium rate is greater), to indicate that "calls will cost 10p/min from a BT landline (other providers may charge more) etc..." This really should have no financial impact on the companies/organisations using these numbers based on the ICSTIS believe that the only use for this will be for the network features and not to deliberately gain revenue from the call, therefore making it a "Cost Neutral" solution as it will cost consumers at least 10p/min if we continue with the call, but at least we would be fully aware of that at the start rather than when our telephone bill arrive.

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 with the exceptions indicated in 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 with the exceptions indicated in 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 with the exceptions indicated in 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, but ICSTIS should ensure that the fact that 0871 is promoted as a premium rate number (albeit lower amount than 09x but higher than 0870) and that Communication Providers (CPs)/Service Providers are made to advertise the 0871 number range along with the charge rate which some CPs do with their 0870.

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 a 087x number does not display it via CLI (Caller Display Identity) but shows their 0800/0845/Geographical location number instead. This would have the advantage of consumers always having a return number whilst saving the CPs and 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, this includes 0870 numbers. Also most Government departments are not allowed to use any 087x or 09xx service as they already define them a "Premium rate" services.

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.

No response