

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	Melvyn Cooper
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, in so far as it does not conflict with any of my other answers/comments/suggestions 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, in so far as it does not conflict with any of my other answers/comments/suggestions 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.
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. This is a contradiction as 0871 will be premium rate numbers hence why they will be regulated by ICSTIS. Therefore, it defeats the point of the service provider not holding a non-premium rate number but yet allow them to hold an 0871 contact number. It is suggested therefore that service providers be required to hold a geographical or 0870 number and NOT 0871 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, in so far as it does not conflict with any of my other answers/comments/suggestions.
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 Ofcom is currently investigating scams on 0870 numbers. Once 0870 loses its revenue share, most companies/organisations are expected to migrate to 0871 and this means scam artists will also do this. What you propose will do nothing about call queuing; this is not in the consumers' interests and merely favours the interests of the organisations using these numbers.

It has been stated by ICSTIS that many organisations will use 0871 not for the revenue share (which can be as much as 6ppm) but for advanced network features. These features are available on 0845 (except for the revenue sharing).

Many organisations dare not move to 09x because of public awareness that these are premium rate numbers. This awareness does not extend to 0871 numbers, where revenue sharing exists (albeit at lower rates). It is possible to be held in a queue for over 20 minutes when ringing some organisations using 0870, generating over £1 per call for the organisation, thus providing a strong financial incentive to keep callers waiting.

Some organisations have an announcement when first connected stating where you are in the queue with an estimate of response time. This should be made mandatory for all organisations which adopt 0871 numbers.

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 because consumers will not be aware that 0871 is a premium rate number (unlike 09x where consumer knowledge that this is premium rate is greater), 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)." This really has hardly any financial impact on the companies/organisations using these numbers in fact the extra 10 seconds or so it takes to say this will cost us consumers but at least consumers would be fully aware that they are paying at least 10p/min.

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, in so far as it does not conflict with any of my other answers/comments/suggestions.

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, in so far as it does not conflict with any of my other answers/comments/suggestions.

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, in so far as it does not conflict with any of my other answers/comments/suggestions.

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) and that Communication Providers (CPs)/Service Providers do not advertise the 0871 number range as 'national rate' which some CPs currently do this.
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 an 0871 does not display via CLI (Caller Display Identity) their 0871 number. Instead, companies/organisations should use freephone or lower-cost number ranges. 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. 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
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

Melvyn Cooper