

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	Paul Crosby
Representing (self or organisation/s):	Self - as a telephone consumer

<p><i>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.</i></p> <p>Yes, in so far as it does not conflict with any of my other answers/comments/suggestions below.</p>
<p><i>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.</i></p> <p>Yes, in so far as it does not conflict with any of my other answers/comments/suggestions below.</p>
<p><i>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.</i></p> <p>Yes.</p>
<p><i>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.</i></p> <p>No.</p>
<p><i>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.</i></p> <p>Yes.</p>
<p><i>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.</i></p> <p>Yes, in so far as it does not conflict with any of my other answers/comments/suggestions below.</p>
<p><i>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.</i></p> <p>Yes, in so far as it does not conflict with any of my other answers/comments/suggestions below.</p>
<p><i>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.</i></p> <p>Yes.</p>

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 both you and Ofcom have received significant complaints concerning 0871 numbers and that Ofcom is currently investigating scams on 0870 numbers. As the proposals for 0870 loses its revenue share progress, companies/organisations are already migrating to 0871: clearly scam perpetrators will do the same. What you propose is to do nothing call queuing. This is NOT in the consumer interest, only in the interest of companies/organisations using these numbers.

ICSTIS has stated that many companies/organisations will use 0871 not for the revenue share but for the advanced network features. This is an irrelevance since they could use obtain the same advanced platform translation features from 0845 and similar low cost numbers.

Clearly the main reason for using 0871 is for the income stream it generates. Unfortunately whilst most consumers recognise 09xx numbers are premium rate numbers they do not have the same perception of 087x numbers.

I suggest that all revenue-share services should be forced to migrate to 09xx series numbers, irrespective of the level of that share.

The practice of permitting companies to generate revenue even whilst consumers are held in a queue should be banned. I have been held in a queue for more that 15 minutes after the call was answered whilst waiting for an advisor to respond. It is disgraceful that this blatant fleecing of customers is permitted to continue. There is clearly a disincentive to answer calls promptly – wasting time for the caller and productivity for UK plc.

Some companies advise customers that they are in a queue at number xx and anticipated time to answer will be yy minutes. This coupled with an announcement that calls cost so much per minute should be mandatory on all revenue-share numbers where queuing is involved and would give the consumer sufficient information to make a considered judgement about whether to hold.

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.

No - Please see response to Q9

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

No. All revenue-share services should use 09xx numbers

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 the 0871 number as the CLI. Instead, companies/organisations should use geographical or lower-cost number ranges.

This would have the added benefit for Ofcom by reducing to investigate missed calls/silent calls (whether deliberate or not) as this is potentially in contravention of current Ofcom rules. 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 SHOULD BE ENFORCED.

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