

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	Paul DAVEY
Representing	Self and family, assorted informal colleagues working inside and outside the telco industry

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, to the creation - but I have some reservations about its content.	
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, I think it appropriate that any revenue generation or sharing services are covered by the general ICSTIS principles and code.	
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.	

No - 08xx numbers are known to be special (even if the many consumers are not familiar with the non-geographical tag).

The 0871 range is therefore very different in concept to 09xx premium ranges or even the legacy 070 personal numbering.

I object most strongly to the principle any revenue generation from customer service numbers that are treated as premium rate for revenue share and regulation, but which are not regarded as that category for customer access.

I therefore propose that customer service arrangements should continue to be required and continue not to be permitted on any line with a revenue generation or share.

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 providing 0871 numbers are treated like other ICSTIS regulated ranges in all other fashions. The difference is one of degree not of type.

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, can certainly not without transparent charging or costs information.

As the telco industry uses special treatment of all non-geographic numbers (especially on bundled minutes or calls tariffs for mobile and fixed line services) and calls are frequently more expensive than geographic calls (eg from Virgin Mobile).

If answered call queuing is not permitted on a full rate premium line (09x) it should not be possible on a lower rate line (0871) line.

Having worked for a large telco (NTL) if a call centre is swamped with calls the fact that this is a customer relations or customer service problem is of no value to a customer who is being charged time and money to try and report or resolve a problem.

If companies earn revenue from 0871 charges it should be restricted to use on associated services with the service provider – eg leaving a voicemail and/or callback request, other advanced queuing or use of IVR or other automated systems.

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.

ICTSTIS/OFCOM should consider a system like the French labelling of non-geo lines as Call bleu (blue - local) or Call Vert (green – free).

For example Yellow, Orange, Red could be Premium/Super Premium lines?
Perhaps even another colour as a fixed fee charge (SMS, or mobile or landline call)

Right now to the average consumer 09x means expensive – and pay for service
07x means mobile – special
08x means special/non-geographic - not a money making number
(and is this discrepancy not why 0870 is revenue share is being restricted, and 0871 regulation transferred to ICSTIS?)

Another suggestion is that the BT rate (as the benchmark – of course other providers may charge more) should be provided to the caller at the start of the call.

(Like patient line does – I recently had to call that repeatedly from a mobile abroad – but at least I had a clue that was going to be charged a fortune)

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 – but why not have separate ranges for recorded/automated and live services to make the system more transparent?

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 – as long as the issues related to revenue share/generation are followed ie any premium rate charge deserves common regulations.

0871 should be no different to 09x services charging a few pence per minute more at the lower end of the range.

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.

No opinion

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.

No opinion

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.

No opinion

Q18: Do you agree that a minimum payment amount from each network operator should be £500 per annum? If not, please provide your reasons.

No opinion

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.

0871 should be clearly branded – and logically should have an 09 prefix.

0871 is a premium rate line – again the difference is degree not type.

It should not be so similar to 0870 and 0845 – people don't understand the difference now – when ICSTIS takes it over and the rules change a clearer definition of brand charge types is essential.

Refer to Q10 above for one example.

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?

ICSTIS should work with OFCOM to clearly define and regulate all premium rate services.

Regulation without customer awareness of the issues involved will have no benefit to consumers it is usually unrealistic to get refunds of charges from a service provider.

As well as investigating complaints ICSTIS should have a duty to ensure the consumer can make a fair and informed use of premium services.

To rectify the “incomplete understanding by consumers of the costs of calls to any specific number, and of the services that are permitted to use specific numbers.” you need to work together, but it makes sense for ICSTIS to focus on the value added 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 opinion