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

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| 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, unless this conflicts with my other answers given 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, unless this conflicts with any of my other answers given 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 within section 3 of the code, service providers also hold non premium rate UK customer service numbers but you think 087x numbers are ok. This is a contradiction, 0871 numbers will be premium rate, or they wouldn't be regulated by ICSTIS. What is the point of the service provider being required to hold a non-premium or geographical number, then allowing them to hold an 0871 contact number? I suggest service providers are required to hold a geographical number, which I have already paid for in my telephone service provision, or at worst an 0845 number. |
| 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, except where it might conflict with other answers given below |
| 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 over 0871, as has OFCOM and OFCOM are currently investigating scams using 0870 numbers. Once 0870 loses its revenue share, most companies may migrate to 0871 numbers, along with those propagating scams. The proposal not to address call queueing times is not in the interest of the user, but the service provider whose pocket it is lining.

ICSTIS stated that most companies will not use 0871 not for revenue, but advanced networking features, which would seem to be untrue or they would be using 0845 numbers, where the revenue is used to pay for the service provided, and not passed on to the company

It would appear that the primary reason for using an 0871 number is for the revenue share plus the advance network features and many consumers ignorance of the fact that 0871 are premium rate numbers, hence many companies already use 0871 numbers.

Most organisations would not move to 09- numbers, as there is widespread consumer awareness that these are premium rate numbers. As you propose no regulation of call waiting times, there is an incentive for companies to keep callers waiting, even for a few minutes per call as this would rapidly multiply over many calls and many days to a significant sum.

Perhaps at the start of the call, notification that you are held in a queue and approximately how long that queue is would give the consumer an opportunity to ring back, when the queue is shorter and therefore the call cheaper! This could easily be funded from the 0871 revenue, as you claim this is being used primarily for the extra networking features, and therefore the company has no problem with spending the revenue thus.

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 consumers are unlikely to be aware that this is a premium rate service, so this should be announced when the call is answered, giving the consumer information to make an informed decision

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

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| 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, unless there is a conflict with my 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, unless there is a conflict with my 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, unless there is a conflict with my 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, as long as it is advertised as a premium rate number, and Communication Providers/Service Providers do not advertise this is a national rate number, which some already do. |
| 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 involving missed or silent calls, ICSTIS should ensure that companies and organisation using 0871 does not display via CLI. Caller Display Identity their 0871 number, but freephone or national rate numbers. Currently OFCOM rules state that no company or organisation making phone calls (sales? etc) should not display any number costing more than the rate of an 0845 number 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 |

