

Consultation: 0871 Services
FAO: Mr Nathan Marshall
Name of respondent: Miss Olusola Fadero
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, as far as it does not contradict with my other comments below

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, as far as it does not contradict with my other comments below

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. Section 1 of the document states that 0871 numbers are premium rate numbers while section 3 states that ICSTIS requires services providers to hold non-premium rate UK customer service numbers.

Therefore this is a contradiction.

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, as far as it does not contradict with my other comments 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.

The proposals aim seems to be the minimisation of the cost to the regulators, OFCOM and ICSTIS, of investigating large numbers of consumer complaints, however as there is already lots of complaints about 0870 numbers not setting a bench mark for service providers in there use of 0871 numbers will I feel actually lead to more investigations and cost the regulators more.

In addition many financially disadvantaged consumers use mobile phones which charge an additional premium for calling 087X numbers and your proposal does nothing to tackle the problem of the costs and time involved in call queuing for these and any other consumer. It basically leaves it until consumers generate a large number of complaints before any action is taken like in the case of number scrams. This could be over come by making it mandatory that all service providers using 087X

numbers inform the consumer the time they are going to spend in a queue as soon as they join it. This would use some of the revenue made from the 087X number but as ICSTIS states that the main use of the number is not for revenue generation but to provide advanced call features, this would not be a problem.

In my view if a company was concerned about customer service instead of revenue generation they would either use a geographical UK number or a lower cost 0845 number, and therefore providing bench marks of how service providers should conduct themselves, while costing the service providers some of their revenue, should be properly included.

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 however it should be mandatory for service providers to state the cost of the telephone call from a BT line and state it will cost more from other networks.

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, as far as it does not contradict with my other comments 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, as far as it does not contradict with my other comments 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, as far as it does not contradict with my other comments 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.
Yes as long as ICSTIS doesn't not allow service providers to claim that 087X numbers are national rate numbers, when in fact they are premium rate numbers. As stated in Q10 service providers should be mandatory required to state the cost of the call from a BT line and that it costs more from other networks.

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 scrams and silent calls, ICSTIS should make it mandatory that service providers using 087X numbers, if they wish to use a caller display identity they must insure it is a geographical UK number, freephone number or 0845 number. I have worked in a call centre which used an 0845 number and frequently customers called us back if they missed our call. If they called back a premium rate 087X number and where held up in a queue this would be costly.

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

Miss Olusola Fadero