

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

<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, as long as it doesn't conflict with any of my other answers 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, as long as it doesn't conflict with any of my other answers 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>not applicable</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. EXCEPT that it is mentioned elsewhere in section 3, that service providers also hold non premium rate UK numbers, but you think 087 is ok. this is not right as 0871 numbers will be premium rate. therefore it defeats the point of service providers not holding a non-premium rate no, yet allow them to hold a 0871 number. I SUGGEST that service providers be REQUIRED to hold a geographical not 0871 number.</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, as long as it doesn't conflict with any of my other answers</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>
<p><i>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.</i></p>

<p>NO you and Ofcom receive a lot of complaints about 0871 numbers and ofcom is investigating 0870 numbers. Once 0870 loses its revenue share, most companies will move to 0871. What you propose is not do anything about call queuing which is not in the customer's interest, only the companies using these numbers.</p> <p>I am aware that 0845 numbers offer the same advanced network features as 0871 except in most cases revenue sharing isn't passed to the company. Therefore, the main interest in using 0871 for the company is the revenue share. However most customers are not made aware that 0871 is premium rate, compared to 09 numbers which most know are premium rate. It is possible to be held in a queue, calling an 0870 number now for at least 20 mins meaning the company gets £1 for keeping me waiting. It is an obvious incentive to keep customers waiting.</p> <p>I believe customers should not be charged for being kept on hold and I'm sure companies will not incur extra financial burdens if this charge is not made to customers.</p> <p>IF this is not possible, then an announcement when the number is first rung, stating how long I will be kept waiting, would allow me to choose to pay or call back late.</p>
<p><i>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.</i></p>
<p>yes, EXCEPT that companies should be made to say when call is answered how much a minute it will cost.</p>
<p><i>Q11: Do you agree that it is appropriate to allow a three-month implementation period, as outlined above?</i></p>
<p>yes</p>
<p><i>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.</i></p>
<p>yes</p>
<p><i>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.</i></p>
<p>yes, as long as it doesn't conflict with any of my other answers</p>
<p><i>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.</i></p>
<p>yes, as long as it doesn't conflict with any of my other answers</p>
<p><i>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.</i></p>
<p>yes, as long as it doesn't conflict with any of my other answers</p>
<p><i>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.</i></p>
<p>yes</p>
<p><i>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.</i></p>
<p>yes</p>
<p><i>Q18: Do you agree that a minimum payment amount from each network operator should be £500 per annum? If not, please provide your reasons.</i></p>
<p>yes</p>

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 that 0871 is also a premium rate number (although not as costly as 09 numbers) and that service providers do not advertise 0871 as a national rate.

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 using missed calls etc, ICTSTIS should ensure companies using 0871 numbers does NOT display via call identity their 0871 number, BUT INSTEAD they should use a freephone or low cost number. This would save OFcom investigating missed calls etc, as this is potentially against rules. Currently ofcom rules say companies should not display numbers costing more than rate of local (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