

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	Thomas William Hall
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, in so far as it does not conflict with any of my other answers 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, in so far as it does not conflict with any of my other answers.

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 it is mentioned within section 3 of the code that service providers also hold non-premium rate UK customer service numbers and that you currently think 087x numbers are non-premium rate. This is a contradiction as 0871 will be a premium rate number which is why they will be regulated by ICSTIS. Therefore, it defeats the point of the service provider not holding a non-premium rate number but yet allow them to hold an 0871 contact number. It is suggested therefore that service providers be required to hold a geographical or 0870 number and NOT 0871 numbers.

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

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 a significant number of complaints concerning 0871 numbers as has Ofcom and at this time Ofcom is currently investigating scams on 0870 numbers. Once 0870 loses its revenue share, most companies or organisations are expected to migrate to 0871 and this means scam artists will also do this. The proposal not to do anything about call queueing is absolutely not in the consumer's best interest, but only in the interest of those organisations using these numbers.

It has been stated by ICSTIS that many companies will use 0871 not for the revenue share (that can be as much as up to 6p/min) but for the advanced network features. If this were true then companies would use other lower-rate non-geographical numbers like 0845 which offer the same advanced network features except of course in most cases revenue sharing isn't passed on to the company. Instead it is retained by the service provider to pay for the advanced network services.

Therefore, the primary interest in using 0871 is for the revenue share in addition to the advanced network features available, but the difference is that many consumers currently aren't aware that 0871 is premium rate, which is why many companies have already migrated to 0871.

Many companies would not dare move to 09x (not even at 15p/min) because in all likelihood they are aware that consumers know that 09x is a premium rate and that this would cause many complaints so instead they have opted for 0871 where revenue still exists but without consumer knowledge that they are using a premium rate number (albeit lower amounts). What is even worse is your proposal that consumers can be charged whilst being held in a queue. It is possible to be held in a queue for over 20minutes when ringing some companies on their 0870 now. This equates to the company getting over £1 for every call they get that lasts 20minutes while just being held in a queue. If a company gets hundreds or even thousands of calls a day then this adds up to a considerable sum of our money a period of time. Therefore there is a considerable incentive to keep callers waiting for as long as possible.

I believe with the extra revenue possible from 0871 numbers, that this could easily be used to ensure that we consumers aren't charged for being kept on hold for long periods. I do not believe that with the extra revenue possible from 0871 numbers, that this would add any extra financial burden on companies operating 0871 numbers.

If this is still not possible then it should be mandatory that an announcement is made when first rung that states where you are in the queue and how long it is estimated you'll be before being answered. This would allow consumers to know in advance that they could have to wait a long time and could choose to ring back later, etc. Again, this could all be paid for out of the revenue from the calls companies receive which ICSTIS seems

to believe is really only used for network features and not to deliberately gain revenue from the call.

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 because consumers will not be aware that 0871 is a premium rate number (unlike 09x where consumer knowledge that this is premium rate is greater), companies should also be obliged to say when they answer the call that "calls will cost 10p/min from a BT landline (other providers may charge more)." This would have a negligible financial impact on the companies using these numbers. In fact the extra 10 seconds or so it takes to say this will cost consumers, but at least we would then be fully aware that we would be paying at least 10p/min.

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.

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.

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.

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
<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>
Yes
<i>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.</i>
Yes, so long as ICSTIS does not try and hide the fact that 0871 is a premium rate number (albeit lower amount than 09x) and that Communication Providers /Service Providers do not advertise the 0871 number range as 'national rate' which some CPs currently do.
<i>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?</i>
To discourage scams with missed/silent Phone calls, ICSTIS should ensure that companies using an 0871 do not display via CLI (Caller Display Identity) their 0871 number. Instead, companies should use freephone or lower-cost number ranges. This would also save Ofcom having to investigate missed /silent calls (whether deliberate or not) as this is potentially in contravention of current Ofcom rules. Currently, Ofcom rules state that companies making phone calls (sales, etc) should not display any number costing more than the rate of an 0845 on CLI.
<i>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.</i>
n/a