

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	Paul Hancocks
Representing (self or organisation/s):	Self/Private individual

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, but please see what I say below as some of my answers below need taking into account in the detail of your proposed Statement of Application for the 0871 range	
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.	
Same answer as above, I agree with some additional concerns	
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.	
Not applicable to me	
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 but I am a bit confused by the content of section 3 of the code where you currently state that 087X numbers are satisfactory. If 0871 will be premium rate numbers not as high as 09XX but still at a rate charging a premium over geographic numbers) then it seems to be contradictory as they will be regulated by ICSTIS. Service providers should be required to hold a geographical or 0870 number and NOT 0871 numbers because they are premium rate 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 my other answers don't override this stated opinion.	
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, it should be treated the same.	

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. I think it is wrong. Companies use 0871 numbers to gain revenue from their customer calling them and they charge us whilst we wait on the line listening to their hold music. Customers are not clearly informed when they call 0870 numbers that they are being charged and that the company is taking a cut of the revenue from the service provider, many companies will move to 0871 to take advantage of a lack of consumer knowledge. Also, companies don't tell you how long you are expected to queue for, whilst you pay them to keep you waiting.

The rules should require the cost to be declared if that were feasible but more importantly they should be required to state clearly how long the wait time is going to be and the fact that the customer is being charged whilst holding for service. If it were feasible, any wait time in excess of the projected time should be free of charge.

Otherwise my opinion is that they should build this cost into their sales prices and use standard telephone numbers so that consumers can call them from their land line or mobile phone and have the call classed as part of their bundled minutes etc.

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, but customers won't know that 0871 is actually not a number they can call as part of their bundled minutes or at a standard rate. It IS a premium rate number. I think consumers know that 09XX numbers are premium rate, but they don't know how 08XX numbers are working.

Companies and organisations should also be required to say when they answer the call that "calls will cost 10p/min from a BT landline (other providers may charge more)." This requirement does not impose difficulties for companies and no significant cost on them – indeed, whilst they say these words the consumer is still paying to be told!! Consumers should be made fully aware that they are paying at least 10p/min whilst they wait.

Q11: Do you agree that it is appropriate to allow a three-month implementation period, as outlined above?

Yes, 3 months seems appropriate to me.

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 not overriding the comments given in answer to other questions here.

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, but not overriding the comments given in answer to other questions here.

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, but not overriding the comments given in answer to other questions here.

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 do.

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.

I'm not sure why you need another brand but if you create one it MUST not try to make 0871 seem like a standard call cost number. It costs more, even though less than 09XX numbers, it costs more and is not something I can call on my mobile at the same cost or included as part of my bundled minutes.

It must be clear that **0871 is a premium rate number** and Service Providers or Communication Providers must *NOT be allowed* to say that calls are charged at "National Rate" because it is not (and that happens now with 0870 numbers which is a lie, perhaps unwittingly, by the companies concerned, who use the "national rate" words)

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 with missed phone calls/silent calls, ICSTIS should ensure that companies/organisations using an 0871 number does not display their calling number (Caller Display Identity) as an 0871 number. Instead, companies/organisations should use freephone or lower-cost number ranges. This would also save Ofcom having to investigate missed calls/silent calls (whether deliberate or not) as this is potentially in contravention of current Ofcom rules. Currently, Ofcom rules state that companies/organisations making phone calls (sales, etc) should not display any number costing more than the rate of an 0845 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.

I don't have any view on this.