

<b>Consultation:</b>	<b>0871 Services</b>
<b>FAO:</b>	Mr Nathan Marshall
<b>Name of respondent:</b>	Mr. John Howes
<b>Representing (self or organisation/s):</b>	Self

<b>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.</b>	
Yes, providing that it does not conflict with any of my other answers/comments/suggestions	
<b>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.</b>	
Yes, providing that it does not conflict with any of my other answers/comments/suggestions	
<b>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.</b>	
Yes	
<b>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.</b>	
None	
<b>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.</b>	
Yes	
<b>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.</b>	
Yes except that within section 3 of the code it is stated that service providers also hold non-premium rate UK customer service numbers but that you consider 087x numbers to be ok. This is a contradiction as 0871 will be premium rate numbers hence 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	
<b>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.</b>	
Yes, providing that it does not conflict with any of my other answers/comments/suggestions	
<b>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.</b>	
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. It has been stated that significant complaints have been received concerning 0871 numbers by your organisation and Ofcom, and at this time Ofcom is currently investigating scams on 0870 numbers.

Once 0870 loses revenue sharing, most companies are expected to migrate to 0871 surely this means scammers will also. It is proposed to do nothing regarding call queuing for revenue generation, this cannot in consumers interests, it is in the interest of companies using these numbers. It has been stated by ICSTIS that many companies will use the 0871 number range, not for generating revenue share (which can be as much as up to 6p/min) but for the advanced network features.

If this were true then these companies would use other lower-rate non-geographical numbers like 0845 which already offer the same advanced network features. The difference is that in most cases revenue sharing isn't passed to the company it is instead retained by the service provider to pay for the network services.

Therefore the primary reason for the use of 0871 must be for revenue income. The main difference between 09x and 0871 numbers is that many consumers aren't aware that 0871 is premium rate; this is the reason why many companies have already migrated to 0871.

Most companies will not move to 09x (even at 15p/min) because they know that their consumers are aware that 09x numbers are premium rate. As this would undoubtedly generate many complaints companies have opted instead for 0871 numbers where revenue generation exists but where customers are not aware they are ringing a low rate premium rate number. Customers using 087x numbers will consider that they are using a 'National Rate' number they will not be aware that they are paying premium rates for the call, or whilst being held in a queue. This is especially important when it is possible to be held in a queue for over 20minutes by some companies when calling their 0870 numbers already. This equates to the company receiving over £1 for every call lasting 20minutes. For companies receiving hundreds or even thousands of calls a day the income generation is considerable and can therefore be an incentive to actually keep callers waiting.

The extra revenue generation possible from 0871 numbers should be used to ensure that customers are not charged for being kept on hold for extended periods. Instead it could be used to provide better levels of customer service and the elimination of long queues.

Some companies already provide an announcement at the commencement of a call, which informs the caller where they are in the queue and provides an estimation of the time before being answered. This allows customers to choose between holding or ringing back later. If ICSTIS really believes that 0871 numbers will only be used for network features and not to deliberately gain revenue then the cost of providing the improved level of customer service could be paid for out of the call revenue.

**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 is greater). Companies should also be obliged to inform customers when the call is answered that the call will cost 10p/min from a BT landline (and that other providers may charge more). Providing this information will not impose any financial impact on the companies using these numbers, in fact the extra 10 seconds taken stating this will be paid for by customers, but at least they will then be aware of the charging rate.

**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, providing that it does not conflict with any of my other answers/comments/suggestions.

**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, providing that it does not conflict with any of my other answers/comments/suggestions.

**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, providing that it does not conflict with any of my other answers/comments/suggestions.

**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, providing ICSTIS doesn't try and hide the fact that 0871 numbers are premium rate numbers (albeit at a lower rate than 09x) and that Communication Providers (CPs) and Service Providers do not advertise the 0871 number range as 'National Rate' which some CPs currently 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?**

Yes. To discourage scams being set up regarding missed phone calls and silent calls, ICSTIS should ensure that companies using an 0871 number cannot display via CLI (Caller Display Identity) their 0871 number. Companies should be forced to use freephone or lower-cost number ranges. This would also prevent Ofcom having to investigate missed calls/silent calls (whether deliberate or not) this is potentially a contravention of current Ofcom rules. Ofcom rules currently state that companies 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.**

N/A

Dear Mr Marshall

I am very distressed about the application of 0870 numbers as money making methods and scams. These numbers were introduced to make calling companies cheaper, when BT call charges were so high. However, they have evolved into stealth money making opportunities, worthy of the Chancellors taxes.

We now have economic pre paid calling from many providers including BT, making 0870 numbers a nuisance as they are always excluded from a call plan.

Controls are needed for 0870 numbers, most people believe them to be low cost calls, but most are not low cost at all.

There is no legislation to advise of how much calls will cost at the outset. Some operators are responsible and tell you up front the cost of the call, but most do not.

What about call holding, what a way to make money, keep them on line for 10 mins, it pays the wage bill, or they go away and the provider make money.

This whole area of commerce need overhaul and control.

Regards  
John Howes