

I do not agree with continued allowance of premium numbers for standard contact telephone calls unless you also include a requirement for geographic numbers to be given as alternatives. It is quite disgraceful that you should be even considering continuing to allow secret profits and including charges that encourage unproductive queuing that adds to these charges / profits.

**You mentioned that within section 3 of the code that service providers also hold non-premium rate UK customer service numbers but that you currently think 087x numbers are ok. This is a contradiction as 0871 will be premium rate numbers hence regulated by ICSTIS. .**

**You state that you have received significant 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/organisations are expected to migrate to 0871 and this means scam artists will also do this. What you propose to basically not do anything about call queuing is not at all in the consumer interest but only in the interest of companies/organisations using these numbers.**

**Many companies/organisations would not dare move openly to premium numbers e.g. 09 but are encouraged to do so secretly by your proposals without customer knowledge that they are in fact ringing a premium rate number (albeit lower amounts) and according to your proposal, being able to gain revenue even whilst consumers are held in a queue. Therefore there is an incentive to keep callers waiting.**

**All systems should also include as some do, auto announcement when first rung that states where you are in the queue and how long it's estimated you'll be before being answered. This would allow us consumers to know in advance that they could be a long time and can choose to ring back later, etc. Again, this could all be paid for out of the revenue from the call they receive which ICSTIS believes is really only used for network features and not to deliberately gain revenue from the call.**

**To discourage scams with missed phone calls/silent calls, ICSTIS should ensure that companies/organisations using an 0871 does not display via CLI (Caller Display Identity) their 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.**