

<b>Consultation:</b>	<b>0871 Services</b>
<b>FAO:</b>	Mr Nathan Marshall
<b>Name of respondent:</b>	Paddy Landau
<b>Representing (self or organisation/s):</b>	Both self and as a small business owner

<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, but only to the extent that it does not give companies an open license to charge excess rates (see following comments).	
<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, but only to the extent that it does not give companies an open license to charge excess rates (see following comments).	
<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>	
No	
<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	

**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.**

Why is it restricted to this? Various service providers cost both my family and my business a fortune in calling. For example, my broadband provider has decided to charge an astonishing 25p/min in order to report a broken broadband.

Call queuing is another BIG problem with these expensive numbers. Should I really be expected to sit on the phone for ten minutes (that is hardly unusual) listening to tinned music, then another 20 minutes while an engineer investigates the problem (that, too, is normal), costing me £7.50 to report a broken service? That's outrageous!

I therefore suggest that all companies be required to provide a normal landline number (i.e. 01 or 02) for customers to contact them. I understand that special services may be charged for, and that is fair; but how does one phone to request information or to report a broken service?

**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, but subject to the other comments I have answered.

**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. Companies will simply migrate to 0871 numbers or even 09 numbers (some have already done so). The implication is that “customer services” is a service that the customer should pay for, when in reality it is a service that the customer has ALREADY paid for. Customers such as my business or my family sometimes end up paying twice, or even more than that, in order to complain about a malfunctioning product or service.

It is vital to have companies:

- Offer a landline number to contact the company (customer service, of course, can ask people to phone a different number for premium rate services, but reporting faulty products or services should NOT be considered a premium rate service!).
- Announce at the start of the call how much the customer is paying for the phone call (this should apply to ALL 08 and 09 numbers (apart from free-phone, which would be optional), because these days even 0844 and 0845 numbers cost more than landlines).
- If there is a queue, give the customer an option to leave a voicemail with his telephone number, and have the company phone back WITHIN 24 HOURS. (Some companies offer this but do not phone back.)
- In addition, if there is a queue, give the customer an estimated waiting time, so that the customer can make an informed decision.

**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.**

As already stated in Q9, I do not think that the situation has been sufficiently covered. An example of the wording might be:

“Calls on this number cost 10p per minute from a BT landline. Other providers may charge more. There is an estimated wait of 7 minutes. If you prefer, please press 1 to leave a message and we will call you back within 24 hours. Otherwise, please hold.”

**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, but subject to the other comments I have answered.

**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 subject to the other comments I have answered.

**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 subject to the other comments I have answered.

**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, provided that:

- Companies do not in any way disguise the costs of the calls, but make them clear not only at the start of the calls (see Q9 and Q10);
- And that they publish the prices wherever else these numbers are used (e.g. websites, pamphlets, advertising literature, TV and radio adverts).

**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?**

Companies should not be allowed to use their 08 or 09 numbers on the caller display identity (CLI). I have had scams come to my phone with this nonsense; fortunately, in my case, I was aware of them, but I know some people who have been caught by it.

**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