

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	Patricia Lee
Representing (self or organisation/s):	Self

<p>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.</p> <p>Yes, as long as it doesn't conflict with any of my responses</p>
<p>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.</p> <p>Yes, as long as it doesn't conflict with any of my responses</p>
<p>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.</p> <p>Yes</p>
<p>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.</p> <p>N/a</p>
<p>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.</p> <p>N/a</p>
<p>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.</p> <p>Yes service providers also have non-premium rate UK customer service numbers, but ICSTIS believe 087x numbers are acceptable. Au contraire. 0871 will be premium rate numbers and why they will need to be regulated by ICSTIS. Surely, it defeats the point of the service provider (SP) not holding a non-premium rate number, but yet allow them to hold an 0871 contact number. I suggest service providers are required to have a geographical or 0870 number and not 0871 numbers.</p>
<p>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.</p> <p>Yes, as long as it doesn't conflict with any of my responses</p>
<p>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.</p> <p>Yes</p>
<p>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.</p>

<p>No. Apparently ICSTIS and Ofcom (who are investigating scams using 0871 numbers) have received several complaints about 0871. Once the revenue share on 0870 stops, most businesses are expected to change to 0871 which means scammers will also. ICSTIS proposal regarding queuing can only be in the businesses interest.</p> <p>ICSTIS states many businesses will use 0871 for advanced network features, not for revenue share. If this was true then businesses could use numbers like 0845 which have similar advanced network features. It seems to me the main interest is in the revenue share not advanced features. The 0871 number is premium rated, although lower than 09 numbers, so of course businesses want to use 0871, rather than 0845 and they wouldn't want to go to 09 numbers for fear of a consumer outcry.</p> <p>As a customer/client/consumer of these businesses I object to being held in a queue in order for said businesses to make money. I believe this to be a fraudulent way to extract money.</p>
<p>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.</p>
<p>Yes, except that because consumers will not be aware 0871 is a premium rate number, businesses should be obliged to state how much the call is likely to cost.</p>
<p>Q11: Do you agree that it is appropriate to allow a three-month implementation period, as outlined above?</p>
<p>Yes</p>
<p>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.</p>
<p>Yes</p>
<p>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.</p>
<p>Yes, as long as it doesn't conflict with any of my responses</p>
<p>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.</p>
<p>Yes, as long as it doesn't conflict with any of my responses</p>
<p>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.</p>
<p>Yes, as long as it doesn't conflict with any of my responses</p>
<p>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.</p>
<p>Yes</p>
<p>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.</p>
<p>Yes</p>
<p>Q18: Do you agree that a minimum payment amount from each network operator should be £500 per annum? If not, please provide your reasons.</p>
<p>Yes</p>

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, as long as ICSTIS makes it known 0871 is a premium rate number and CPs/SPs don't 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?

To discourage scams with missed phone calls/silent calls, ICSTIS should ensure that businesses using 0871 doesn't display via Caller Display Identity (CLI) their 0871 number. Instead, they should use freephone or lower-cost number ranges. This would also save Ofcom having to investigate missed/silent calls as this is potentially in contravention of current Ofcom rules. These rules state companies/organisations making 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