

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	Hedley C. A. Lester
Representing (self or organisation/s):	self

I don't have time to answer all of your questions. I have four comments/proposals that seem to be lacking in your Code:

- 1. No revenue sharing numbers should be permitted as CLI identification numbers – to prevent scams where numbers are rung with silent calls or calls that do not allow time for the call to be answered, tricking people who are unaware of the cost of calling, for example, 0871 numbers into making a return call.*
- 2. It should be a requirement that anywhere that any revenue sharing numbers (0871 or other) are promulgated, e.g. in literature or voice messages, there must also be a clear statement of the cost of calling the number and the proportion of the cost that goes to the call receiver.*
- 3. All revenue sharing numbers should be prohibited from charging for time waiting for a call to be routed to the final answering facility – be that human or automated. This should apply, for example, to calls made to financial institutions whose first response to a call is often a recorded statutory message. The time spent listening to the recorded message should not be chargeable.*
- 4. All revenue sharing numbers should be regulated and monitored for compliance with the above.*

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.

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.

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.

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.

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.

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.

Q7: Do you agree that the current application of Section 4 of the Code is

<p><i>appropriate to apply to the 0871 number range? If not, please provide your reasons.</i></p>
<p><i>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.</i></p>
<p><i>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.</i></p>
<p><i>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.</i></p>
<p><i>Q11: Do you agree that it is appropriate to allow a three-month implementation period, as outlined above?</i></p>
<p><i>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.</i></p>
<p><i>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.</i></p>
<p><i>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.</i></p>
<p><i>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.</i></p>
<p><i>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.</i></p>
<p><i>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.</i></p>

<i>Q18: Do you agree that a minimum payment amount from each network operator should be £500 per annum? If not, please provide your reasons.</i>
<i>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>
<i>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?</i>
<i>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>