

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

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.
Yes, so long as no conflicts with my other answers
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.
Yes , so long as no conflicts with my other answers
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.
Yes
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.
N/A
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.
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.
Yes except that within sect 3 of the code it states service providers also hold non premium rate UK service nos. but you think 087x nos are OK. As 0871 will be a premium rate no. this is a contradiction. Why will they be regulated by ICSTIS as it defeats the point of the service provider not holding non premium rate number but allow them to hold an 0871 contact number. It is thus suggested that the service providers be required to hold a geographical or 0870 number and not 0871 nos..
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, so long as no conflicts with other answers.
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. Both Ofcom and yourselves have received significant complaints on 0871 nos. and Ofcom is at this time investigating scams on 0870 nos. When 0870 loses its revenue share most organisations are expected to migrate to 0871 nos. and this includes all the scam artists. This is not in the consumer interest as you propose to do nothing about call queueing which is used as an unfair major revenue stream by many of these organisations.

It has been stated by ICSTIS that many companies will utilise 0871 nos for the advanced network features and not revenue share. If this is the case then these organisations should use other non-geographical nos. like 0845 which have the same advanced network features except in most cases the revenue share is retained by the service provider to pay for these services.

Most consumers are unaware that 0871 nos are in fact premium rate nos. and that organisations have moved to them, disguising the fact that they are achieving increased revenue. Most consumers are aware of the premium rate 09x nos. and organisations would not move to them as it would elicit many complaints and customers not utilising them. Hence organisations have quietly opted for 0871 nos. where consumers are unaware that they are in fact ringing a premium no. and ,because of your proposal, will be gaining revenue even when consumers are held in a queue. These organisations thus have a significant incentive to keep callers waiting. This is particularly onerous when the organisation uses these nos. for their service calls, accounts calls, complaints calls or breakdown calls where no other nos. are available, as the customer is paying extra for the problems the organisation has itself created.

I strongly feel that consumers should not be charged for being held in a long queue and that the extra revenue possible with 0871 nos. should be utilised to ensure that this does not happen.

Also I believe that it should be compulsory that in all cases when the call is answered the customer should be informed of :- 1) the cost of the call /min. 2) If there is a short wait, the estimated time before the call will be answered and the estimated cost of waiting. This then allows the customer choice.

As these organisations are only utilising these nos for the advanced network features and not the revenue stream there will be no problem funding these proposals as they can be paid for out of that revenue stream at no extra cost.

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 consumers are unaware that 0871 nos are premium rate nos. Complete transparency is required. Thus Organisations should be obliged to quote the cost of the call /min when they answer the call and if there is an estimated waiting time.

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 provided there are no conflicts with any other answers.
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 provided there are no conflicts with my other answers.
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 provided there are no conflicts with my other answers.
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 ICSTIS ensures that it is known universally that 0871 nos. are in fact premium rate nos. and that Communication and Service Providers do not advertise 0871 nos as 'national rate' nos.
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/silent phone calls, ICSTIS should ensure that organisations utilising 0871 nos. do not display via CLI their 0871 no. Instead organisations should use freephones or lower cost number ranges. This would save Ofcom having to investigate missed/silent calls which are a potential contravention of Ofcom rules. Currently Ofcom rules state that organisations making phone calls should not display any no. costing more than an 0845 on a 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