

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

<p><i>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.</i></p> <p>Yes, in so far as it does not conflict with any of my other answers/comments/suggestions below.</p>
<p><i>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.</i></p> <p>Yes, in so far as it does not conflict with any of my other answers/comments/suggestions below.</p>
<p><i>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.</i></p> <p>Yes in principal</p>
<p><i>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.</i></p> <p>No</p>
<p><i>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.</i></p> <p>Yes in principal</p>
<p><i>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.</i></p> <p>Yes in principal except that it is 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 why they will be regulated by ICSTIS. Therefore, it defeats the point of the service provider not holding a non-premium rate number but yet allow them to hold an 0871 contact number. It is suggested therefore that service providers be required to hold a geographical or 0870 number and NOT 0871 numbers</p>
<p><i>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.</i></p> <p>Yes in principal</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>

Yes in principal

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. You and Ofcom are already investigating significant complaints regards abuse of 0870 numbers. Once 0870 loses it's revenue share, most companies are expected to migrate to 0871 meaning scammers will also use 0871. You propose to do nothing about call queueing, which is not in the consumer interest but only in the interest of companies using these numbers.

If companies want to use 0871 not for the revenue share but for the advanced network features what is wrong with using other lower-rate non-geographical numbers like 0845 that offer the same advanced network features except revenue sharing. Therefore the primary interest of using 0871 is for the revenue. Most companies would not move to 09x (not even at 15p/min) as they are aware consumers know that 09x is a premium rate and that this would cause many complaints so instead they have compromised for 0871 where revenue still exists but without consumer 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. Many of us have been held in a queue for over 20minutes when ringing some companies on their 0870 now, equating to significant revenue for the company, this can be and is an incentive to keep callers waiting.

I suggest an initial message that states where you are in the queue and how long it's estimated you'll be before being answered, after which the call becomes chargeable. This would allow callers to know in advance that they could be a long time and can choose to ring back later, etc. avoiding deliberate gain revenue from the call.

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 not aware 0871 is a premium rate number (unlike 09x where consumer knowledge that this is premium rate is greater), companies should also be obliged to state the cost of the call from a BT landline when they answer and after the initial message suggested in point 9."

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.
<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>
Yes.
<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>
Yes.
<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>
Yes.
<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>
Yes.
<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>
Yes.
<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>
Only if ICSTIS doesn't try and hide the fact that 0871 is a premium rate number and that Communication Providers/Service Providers do not advertise the 0871 number range as 'national rate' which some are currently doing.
<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>
To discourage all types of scams, ICSTIS should ensure that companies using a 0871 do not display via CLI (Caller Display Identity) their 0871 number. Instead, companies should use freephone or lower-cost number ranges. This would also save Ofcom having to investigate current call abuse. Currently, Ofcom rules state that companies making phone calls (sales, etc) should not display any number costing more than the rate of a 0845 on CLI.
<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>
n/a

My last comment on this subject is, what is wrong with companies continuing to use their geographical numbers?