

<b>Consultation:</b>	<b>0871 Services</b>
<b>FAO:</b>	Mr Nathan Marshall
<b>Name of respondent:</b>	Robert Moore
<b>Representing (self or organisation/s):</b>	Self

<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.	
<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	
<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>	
n/a	
<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	
<b>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.</b>	
Yes but section 3 of the code says 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 because 0871 numbers 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	
<b>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.</b>	
I do not understand the detail and implications of this question enough to give an answer that will not prejudice the answers I give to the questions that I do understand so I decline to answer this question.	

***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 do not understand the detail and implications of this question enough to give an answer that will not prejudice the answers I give to the questions that I do understand so I decline to answer this question.

***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 state that you have received significant complaints concerning 0871 numbers and that Ofcom is currently investigating scams on 0870 numbers. Once 0870 loses its revenue share, most companies/organisations are expected to migrate to 0871 and this means unscrupulous dealers will also do this. The complaints will simply move from one number range to the other.

**What is missing is a proposal to avoid the consumer paying for unnecessary call queuing.**

ICSTIS have stated that many companies/organisations will use 0871 not for the revenue share but for the advanced network features. If this was true then companies/organisations would use other lower-rate non-geographical numbers like 0845 which offer the same advanced network features.

Many companies/organisations would not dare move to 09x (not even at 15p/min) because there is a universal awareness that 09x is a potentially seriously costly premium rate number range. These companies have opted for 0871 where revenue still exists but without consumer knowledge that they are in fact ringing a premium rate number.

My suggestion is that companies should be forced by the code to implement one or more of the following protocols to ensure consumers are not kept waiting for unreasonable periods:

1. A short description of the call charges at the start of the call that states the cost per minute to the caller and the amount per minute that the recipient company is earning from the call. This announcement will be **free of charge** much like the existing message I get on Vodafone when I call an 0870 number. The message would say: "You will be charged x pence per minute for this call of which the receiving company will receive y pence per minute. Hang-up now if you do not accept these charges" AND / OR
2. A statement every minute of holding with an estimate of where the caller is in the queue and the estimated time before the call is answered. The statement would include a statement of the cost per minute of the call AND / OR thus: "You have been waiting for x minutes at y pence per minute. You are likely to be waiting a further z minutes before your call is answered. Please hang up now if you do not accept this wait".
3. A published maximum wait time (perhaps specified by the code) for the consumer after which the system will announce that the call will be disconnected and the consumer will be called back by the company. The system then dials the consumer back within 1 minute to continue the wait. The cost of the extended wait period will then be at the company's expense: "You have now waited for x minutes. We will now disconnect this call and call you back to avoid unnecessary call waiting costs to you. Please hang up and wait by your telephone for the call back."

All of the suggestions above serve to remove the incentive for a company to introduce excessive wait times (either through deliberate policy or through lack of investment in call-servicing staff).

**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.**

No, I don't think so.

I believe that the time has now passed that BT call charges are a valid benchmark due to the fragmentation of the telephony industry. I therefore think that all companies using a premium rate number must **publish the costs of that call from ALL public telephony operators** (including mobile operators). There are an increasing number of people who use only mobiles in this country and millions who use third party home telephone providers. The standard statement that a call costs "10p from BT landlines, other providers may vary" now means that a large proportion of the population are unable to predict their call charges. It is now time that the onus must be placed on the company using the premium rate number to agree the charges with all telephony providers and to make these charges visible so **EVERYONE can see the charges that will be made.**

**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.**

I do not understand the detail and implications of this question enough to give an answer that will not prejudice the answers I give to the questions that I do understand so I decline to answer this question.

**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 do not understand the detail and implications of this question enough to give an answer that will not prejudice the answers I give to the questions that I do understand so I decline to answer this question.

**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 do not understand the detail and implications of this question enough to give an answer that will not prejudice the answers I give to the questions that I do understand so I decline to answer this question.

**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 do not understand the detail and implications of this question enough to give an answer that will not prejudice the answers I give to the questions that I do understand so I decline to answer this question.

**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 do not understand the detail and implications of this question enough to give an answer that will not prejudice the answers I give to the questions that I do understand so I decline to answer this question.

**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 do not understand the detail and implications of this question enough to give an answer that will not prejudice the answers I give to the questions that I do understand so I decline to answer this question.

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

No comment.

**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 do not understand the detail and implications of this question enough to give an answer that will not prejudice the answers I give to the questions that I do understand so I decline to answer this question.

**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?**

n/a

**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 do not understand the detail and implications of this question enough to give an answer that will not prejudice the answers I give to the questions that I do understand so I decline to answer this question.