

<b>Consultation:</b>	<b>0871 Services</b>
<b>FAO:</b>	Mr Nathan Marshall
<b>Name of respondent:</b>	Nigel Pollard
<b>Representing (self or organisation/s):</b>	The Grove College

<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, subject to my further comments in this document
<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, subject to my further comments in this document
<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>
No
<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>
In the main but section 3 of the code mentions that service providers also hold non-premium numbers and you think that 087x numbers rank under this heading. This is untrue – 0871 numbers (and to a lesser extent so are 0870 numbers) will be Premium Rate, hence the need for regulation by ICSTIS.
<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>
Yes, subject to my further comments in this document
<b>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.</b>
Yes
<b>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.</b>

Categorically NO. You and Ofcom have already received numerous complaints concerning 0871 numbers. I understand that Ofcom is also investigating misuse (fraudulent) of the 0870 numbers as well. The proposal simply means that such misusers will switch to 0871 numbers. Consequently, for you to do nothing about call queuing is against consumer interests and only supports those organisations wishing to raise revenues through the use of 0871 numbers.

ICSTIS suggests that many organisations will use 0871 simply for the advanced network features. This is nonsense – 0845 numbers are designed for that purpose. It must be transparent that the only reason for an organisation to use an 0871 number is to benefit from the revenue sharing.

Many organisations already realise that many consumers are deeply distrustful of the 09x Premium Rate numbers and so opt for the 0871 numbers where the cost of the calls is hidden. This is particularly important as many organisations using 087x numbers already keep callers on hold for lengthy periods or make them wait through what seem like endless ‘information’ messages before putting them through to an operator. This is the equivalent of charging people for every minute they stand in a queue in the Post Office. Transparently, there is an incentive for these organisations to keep callers on hold and not to improve their productivity regarding calls answering.

On the assumption that 0870 and 0871 numbers are here to stay, there should be at the very least an introductory message to advise callers where they are in the queue, how long it is likely to be before their call is answered and how much the call is costing them each minute. That way at least the caller can make an informed decision as to whether to keep holding or to get on with their life.

**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.**

Not really because many consumers will still be unaware that 0871 is a premium number. Organisations should be obliged to announce at the outset how much the call is costing the caller.

**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, subject to my further comments in this document

**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, subject to my further comments in this document

**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, subject to my further comments in this document

**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.**

Provided that ICSTIS stipulates that 0871 is a Premium Rate number and that 0871 is not permitted to be promoted as a National Rate number (it is often higher than the National Rate so such a statement is a lie).

**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?**

'Silent' calls are a constant source of irritation, even getting through to ex-directory numbers. The existing Ofcom rules that prohibit the display on Caller Identity Display phones of numbers that cost more than an 0845 one should be applied across the board.

**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.**