

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

<p>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.</p> <p>Yes, in so far as it does not conflict with any of my other answers, comments or suggestions below.</p>
<p>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.</p> <p>Yes, in so far as it does not conflict with any of my other answers, comments or suggestions below.</p>
<p>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.</p> <p>Yes.</p>
<p>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.</p> <p>No – not applicable.</p>
<p>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.</p> <p>Yes.</p>
<p>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.</p> <p>Yes 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 seems to be a contradiction as 0871 will be premium rate numbers hence why would they be regulated by ICSTIS? Therefore, it defeats the point of the service provider not holding a non-premium rate number but yet allowing them to hold an 0871 contact number. I propose that service providers be required to hold a geographical or 0870 number and not 0871 numbers.</p>
<p>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.</p> <p>Yes, in so far as it does not conflict with any of my other answers, comments or suggestions below.</p>

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. You state that you have received significant complaints concerning 0871 numbers as has Ofcom. I understand that Ofcom is investigating "scams" on 0870 numbers. Once 0870 loses its revenue share, most companies or organisations are likely to migrate to 0871 and this suggests that scam artists will also do this. What you propose is basically to do nothing about call queuing. I don't see this as in the consumer interest but only in the interest of companies or organisations using these numbers. I have no problem with companies charging for "advice" by using 087x etc. What I have a problem is when companies use the 087x route to gain funding for their own shortcomings. For example, I had a problem with an internet ordered piece of equipment (dead on arrival). The company only accepted problem reporting on an 087x number which costs me about £3 in calls. Had they offered a straight geographical number, I would have paid about one third of this amount at peak rates, free if I had used their weekend service. I think there is also the temptation to offset costs by keeping people on hold far longer than is necessary – there is evidence to suggest that call centre "servers" can do this as a feature. The 087x numbers are an easy means to exploit the general public. If you can't or won't rule against the 087x numbers, would a message on connection saying how long one is in the queue not be mandatory? It does help to decide whether to hang on.
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 because consumers may not be aware that 0871 is a premium rate number (unlike 09x where consumer knowledge that this is premium rate is greater), companies should also be obliged to say when they answer that "calls will cost 10p/min from a BT landline (other providers may charge more)."
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, in so far as it does not conflict with any of my other answers, comments or suggestions below.
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, in so far as it does not conflict with any of my other answers, comments or suggestions below.
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, in so far as it does not conflict with any of my other answers, comments or suggestions below.
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 ICSTIS doesn't try and hide the fact that 0871 is a premium rate number and that Communication Providers (CPs)/Service Providers do not advertise the 0871 number range as 'national rate' which some CPs currently do this.
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 fraud with the missed phone calls/silent calls, ICSTIS should ensure that companies/organisations using an 0871 does not display via CLI their 0871 number. Instead, companies/organisations should use freephone or lower-cost number ranges. This would also save Ofcom having to investigate missed calls/silent calls (whether deliberate or not) as this is potentially in contravention of current Ofcom rules. Currently, Ofcom rules state that companies/organisations making phone calls (sales, etc) should not display any number costing more than the rate of an 0845 on 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.
Not applicable