

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

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 in that it does not conflict with my answers below
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 in that it does not conflict with my answers below
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 it is mentioned in section 3 of the code that service providers also hold non-premium rate 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 will they 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 strongly suggested therefore that service providers be required to hold a geographical or 0870 number and NOT 0871 numbers.
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, in so far as it does not conflict with any of my 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.

Definitely no. You state that you have received significant complaints regarding 0871 numbers as has Ofcom and at this time Ofcom is investigating scams on 0870 numbers. Once 0870 loses its revenue share, most companies/organisations are expected to migrate to 0871 numbers and this means those operating scams on the public will also do this.

That you propose to do nothing about call queuing is clearly against the customer interest and concerns about paying 087 rates for normal contact with companies and organisations and clearly in the interest of the many, many, companies using these numbers. That I have to pay premium rates waiting on the end of a telephone to buy insurance for example or contact my local council smacks of sharp practice.

It has been stated by ICSTIS that many companies/organisations will use 0871 not for the revenue share (can be as much as 6p a minute) 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 except in most cases revenue sharing is not passed to the company/organisation instead being retained by the service provider to pay for the advanced network services.

Therefore the primary purpose in using 0871 is for the revenue share in addition to the advanced network features available but the difference is that many consumers currently are not aware that 0871 is a premium rate number which is why so many companies/organisations have moved to 0871 numbers.

Many companies/organisations would not dare move to 09x (not even at 15p a minute) because they are aware that consumers avoid 089 because they know they are premium rate numbers and there would be a rush of complaints so instead they have opted for 0871 where revenue still exists but with little awareness amongst consumers that they are paying a premium rate. And according to your proposal consumers will be held in a queue on a premium rate number. You must be aware that being held in a queue for over 20 minutes on existing 0870 numbers is a very, very common experience for callers. This equates to companies/organisations 0870 extracting over £1 for every call that takes 20 minutes just waiting in a queue. Companies are well aware that the hundreds even thousands of calls they receive each day then this adds up over the month and years. This is why they connect immediately automatically with callers but then keep them waiting. The incentive under your proposals is to keep callers waiting and calling back time and again. The consumer has no choice as the practice is now almost universal (except when the company is selling you something – they are quick enough to answer the telephone then) and hence there is no competition for best service in company/organisation telephone answering services. Consumers should not be charged for being kept on hold.

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, but all companies using premium rate numbers including 0871 numbers should be required to tell callers what they are being charged per minute. This requirement should apply to all numbers which are not geographical numbers.
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 that it does not conflict with my 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, in so far as it does not conflict 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, in so far as it does not conflict 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, so long as ICSTIS does not try to hide the fact that 0871 is a premium rate number (although lower than 09x) and that communication/service providers are not allowed to advertise the 0871 number range as a 'national rate' as is the current practice of some CPs.

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 require companies/organisations using 0871 do not display via Caller Display Identity 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 the current Ofcom rules. Currently Ofcom rules require that companies/organisations making calls (sales etc) should not displaying number costing moiré that 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.

n/a