

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

<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>
Yes, as long as it does not conflict with any answers or comments below
<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>
Yes, as above
<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>
Yes, as above
<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>
N/a
<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>
Yes
<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>
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. 0871 will be a premium rate number and hence will be regulated by ICSTIS. Therefore it defeats the point of the service provider not holding a premium rate number but yet allow them to hold an 0971 number. It is suggested that service providers be required to hold a geographical or 0870 number and NOT 0871 numbers i.e. only numbers at normal geographical tariff.
<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>
Yes, as far as it does not...as above
<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>
yes
<i>Q9: Do you agree that Option D is a fair and proportionate application of the</i>

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 and at this time Ofcom is currently investigating scams on 0870 numbers. Once 0870 loses its revenue share, most companies/organizations are expected to migrate to 0871 and this means scam artists will do likewise. Basically, lack of action in regard to call queueing is not at all in the consumer's interest but only in the interest of companies or organizations who benefit financially by using these numbers. They have already exploited the public for too long.

It has been stated by ICSTIS that many organizations will use 0871 not for the revenue share but for the advanced network features. However, if this were true these organizations could use numbers like 0845 which offer the same advanced network facilities but without such a substantial revenue share.

In addition, many consumers are not aware that 0871 is premium rate which is why many organizations have already migrated to 0871.

In short I am opposed to any arrangements which will cost customers more than the normal geographical rate UNLESS they have been informed of the call rate wherever the number is advertised AND at the commencement of 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 because consumers will not be aware that 0871 is a premium rate number (unlike 09x), organizations should also be obliged to preface their answers by a statement that "calls will cost 10p/min from a BT landline (charges from other providers may vary)". Callers should always be made aware of what rate they will be paying.

Q11: Do you agree that it is appropriate to allow a three-month implementation period, as outlined above?

Yes, but why should providers be allowed more time to change their practices than they took to implement them in the first place?

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 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, asYes, as above above

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.

<p><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></p>
<p>yes</p>
<p><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></p>
<p>Yes</p>
<p><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></p>
<p>Yes</p>
<p><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></p>
<p>Yes, so long as ICSTIS does not conceal the fact that 0871 is a premium rate number (albeit cheaper than 09x) and that CPs (Communication Service Providers) do not advertise the 0871 number as 'national rate' which some CPs do currently</p>
<p><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></p>
<p>To discourage scams with missed calls ICSTIS should ensure that organizations using an 0871 does not display via Caller Display Identity their 0871 number but an 0800 or regular rate number. Ofcom rules state that organizations making phone calls (sales, etc.) should not display any number costing more than the rate of an 0845 on CLI</p>
<p><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></p>
<p>N/a</p>