

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

<p><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></p> <p>Yes, providing it doesn't affect any other answers that I give.</p>
<p><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></p> <p>Yes, providing it doesn't affect any other answers that I give.</p>
<p><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></p> <p>Yes</p>
<p><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></p> <p>No</p>
<p><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></p> <p>Yes</p>
<p><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></p>

My concerns with regard to the use of 0871 number is in charity work with the elderly and infirm. I do not have any figures to prove my statements except anecdotal evidence of working with the elderly. The elderly in our Society have had to become technologically competent to keep up with the onward modernisation, in particular with the communications industry. Until the 087x number was invented, consumers were aware that they paid to make a telephone call. With the introduction of market principles to the telephone industry, the ensuing competition brought about a number of business models that the consumer could understand and appreciate. ie The consumer made the call, and the consumer paid for that call.....the receiving person did not participate in the payment of the call.

The all inclusive model where the consumer pays usually around £8 per month for FREE unlimited calls, but usually chargeable after 59 minutes. Here we see the consumer actually receiving 266 x 3p calls per month ie 9 calls per day over a 30 day month. In this way, the consumer is paying upfront for their calls and the advantages to both the provider and the consumer are that the provider can attract the consumer with an attractive business model, and the consumer knows that they can control their expenditure on calls. The reality probably is that most people do not make on average 9 calls to 01 & 02 geographical numbers per day. The provider will no doubt have some examples of consumers using the system extensively but overall, the experience for the provider will be one of profit.

With the introduction we move to a system where the profit requirements of businesses and telephone providers are met by the consumer. A new market has been invented and it is pretty much not regulated very well. The consumer has already paid to use his phone, the fact that his package only includes 01 & 02 geographical numbers is because the 087x numbers have been invented, and these numbers have been excluded from their packages.....which they were not a few years ago. The business model is basically not ethical in that the consumer who has already paid, has to now pick up the costs of the Business and the Telephone Provider, in that they see a very health profit from each minute that is used by the consumer.

The market is such that it is almost becoming not common to find a business that will provide a geographical number. I recently called Curry's the electrical retailer and had to use a 087x number to try and contact my local shop. I then went through a series of number pressing to identify the type of query that I wanted answering, and eventually after some minutes was put through to the local shop. In this case their opening remarks asked in what way could they help me....in other words, the preceding 087x call was about making money and not about providing me with a better service, because all that had happened was that I was spending money listening to a series of choices but was then put through to the local shop phone without any of that information being used. ie the consumer is being duped to provide profit for the business using the 087x number.

The fact that it is 087x is very confusing for the elderly and I have had an occasion to step in where an elderly client was allowing an 087x number to place them in a Que., because they believe that this was similar to the 0800 system.

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, providing it doesn't affect any other answers that I give.

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.

087x is a revenue sharing and premium rate system. The general public is not aware of this and they assume that it is a low rate number. There should be restrictions on queuing and regulation to prevent its misuse. One really has to wonder why Broadband providers can provide a system and business model where a fixed monthly fee is paid, yet the telephone providers are charging per minute for something that doesn't actually cost very much to operate. Once the infrastructure is in place, then the minute by minute charging system is to the detriment of the consumer.

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.

There should be a health warning at the beginning of 087x numbers prior to the charging element starting. This will allow consumers who have inadvertently used the number to hang up. ie the consumer is effectively denied choices at this time, where as in the insurance and credit to name a few, there is cooling off periods prior to entering a charging regime.

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.

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.

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, providing it doesn't affect any other answers that I give.

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.

087x should be known as a premium rate number and not a system that using a 'national rate' cost per minute. This isn't true because users of the £7.99 per month inclusive systems are effectively paying 3p per minute within that business model. So, what is a 'national rate', it certainly isn't the same as 087x

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?

The consumer in the free market, which we follow in this country, is king. There has been a reversal of this process by this section of the market and we are quickly reaching a stage where it is unlikely that any organisation will not boost its profits by acquiring 087x numbers. However, this is not fair and proportionate for the consumer.

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