

To Nathan Marshall

I have reviewed the 0871 ICSTIS consultation document.

My general comment is that the consultation document lacks a consumer focus. There are many comments relating to providers and the difficulties they face but few positive statements regarding consumer protection - a key focus of ICSTIS. I highlight the research material provided with the consultation that specifically relates:

- ◆ The high call charges from mobile operators
- ◆ Lack of published information from mobile providers as to rates
- ◆ Customer dissatisfaction with long waiting times on these numbers
- ◆ A lack of customer awareness re the cost of calling these numbers

I can find little in the consultation that addresses these points.

I now provide comments against the specific questions raised in the consultation where I have experience or knowledge:

Q3 due diligence

I propose that the clear and unambiguous publishing of call prices to 0871 by each telecom service provider be a key element of due diligence. Statements that call costs across providers may vary are worthless. This approach would address the findings of the research that this information is not readily available.

Q8 relating to the application of Section 5 of the code

This section makes reference to the registration of 0871 numbers with ICSTIS. I am in agreement with this requirement but would like this information to be placed more into the public domain to aid consumer protection. For example a searchable system via the ICSTIS public website and enquiry service provided by ICSTIS.

Q9 undue delay requirements

I agree with the hybrid approach proposed but how are consumers meant to contact information providers to complain - via the 0871 number with long call waiting times?. Given it can take close on an hour to contact some service desks - does ICSTIS really believe that this is an effective method for consumers to complain. The use of 0871 numbering regime for complaints is not acceptable.

My proposal is that as part of the registration (Q8 above) a standard or freephone number be provided for complaints for each 0871 provider. This could be accessed via the mechanisms referenced in Q8 above and include full postal address etc.

Q10 pricing information requirements

I find this section weak for consumer protection. It does nothing to address the high call charges from mobiles. How do information providers calculate and present the price of calls. I do not believe the bland statement that 'call charges may vary' to be sufficient.

Given that service providers receive monies from the use of such 0871 numbers there must be a requirement on them to provide customers with a clear indication of the call costs before the call commences. This could be a via a recorded message identifying the costs or referring callers to readily available information in the public domain.

The test I would apply to this is whether this information can be accessed both by my teenage children and my aged parents. I would recommend that ICSTIS review again with the needs of these types of individuals to the fore.

Stephen Seabury