

| | |
|---|--|
| Consultation: | 0871 Services |
| FAO: | Mr Nathan Marshall |
| Name of respondent: | Mike Udin |
| Representing (self or organisation/s): | Self, a very unhappy phone user |

| |
|---|
| <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>No. I do NOT agree with ANY premium and high call charge rates for any numbers. All calls should only cost what it costs to operate the system and no more. These are ALL SCAMS and should be BANNED.</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>No. These numbers should be banned and ONLY low-call, local and standard call rates should be allowed.</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>NO 0871 numbers are a scam to make money from callers.</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>n/a</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>No. Calls should cost a basic call rate. Any additional charge is just a scam to make money from callers.</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> |
| <p>No. Section 3 of the code mentions that service providers should also hold non-premium rate UK customer service numbers, and you currently think 087x numbers are OK. This is a contradiction because 0871 will be like Premium Rate numbers regulated by ICSTIS. Therefore, it defeats the point of the service by allowing companies to hold an 0871 contact number. I suggest therefore that service providers should be REQUIRED to hold and publish clearly a geographical and/or low rate 0845 numbers and NOT just 0871 numbers.</p> |
| <p><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></p> |
| <p>No because all except geographical landline and 0845 numbers are a scam.</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.

No because it's still a scam to make money from callers.

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 and at this time Ofcom is currently investigating scams on 0870 numbers. Once 0870 loses it's revenue share, most companies/organisations are expected to migrate to 0871 and this means scam artists will also do this. What you propose will allow chargeable call queuing which is not at all in the consumer interest but only in the interest of companies/organisations using these numbers.

It has been stated by ICSTIS that many companies/organisations will use 0871 not for the revenue share (can be as much as up to 6p/min) 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 isn't passed to the company instead being retained by the service provider to pay for the advanced network services.

Therefore, the primary interest in using 0871 is for the revenue share (in addition to the advanced network features available) but the difference is that many consumers currently aren't aware that 0871 is Premium Rate which is why many companies/organisations have already migrated to 0871.

In my experience it is possible to be held in a queue for over 20minutes when ringing some companies on their 0870 numbers now. This equates to the company getting over £1 for every call they get that lasts 20minutes just being in a queue. If a company gets hundreds or even thousands of calls a day then this adds up over the month and year. Therefore there can be an incentive to keep callers waiting.

I believe that if you do continue to support this **scam of 0871 numbers**, the extra revenue possible from 0871 numbers should be used to ensure that all callers are NOT charged for being kept on hold for undue delays and therefore companies do not benefit from having long queues. I also believe that, with the extra revenue possible from 0871 numbers, this would not add any significant extra financial burden on to companies/organisations operating 0871 numbers.

I also believe that companies should be made to display call charge rates next to ALL phone numbers in brochures and adverts, and announce when first rung the call rate per minute, where you are in the queue and how long it's estimated you will wait before being answered. This would allow consumers to know in advance how long the wait is likely to be and can choose to ring back later, etc. Again, this could all be paid for out of the revenue from the call the organisation finally receives which ICSTIS believes is really only used for network features and not deliberately and deceptively to gain revenue from 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.

No because consumers will not be aware that 0871 is a Premium Rate number (unlike 09x where consumer knowledge that this is premium rate is greater), so companies/organisations should be obliged to say the call rate when they answer the call, for example that "calls will cost 10p/min from a BT landline (other providers may charge more)." This has no impact on the companies/organisations using these numbers and in fact the extra 10 seconds or so it takes to say will increase their revenue and will cost consumers but at least consumers would be fully aware that they are paying at least 10p/min. However, my over-riding opinion is that ALL THESE DISTORTED CALL CHARGES SHOULD BE BANNED.

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

No because it's just a scam to make money out of callers

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.

No because it's just a scam to make money out of callers.

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.

No because it's just a scam to make money out of callers.

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.

No because it's just a scam to make money out of callers.

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.

No because it's just a scam to make money out of callers.

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.

No because any funding model which charges more than standard, local or lo-call rates is a scam to make money out of callers.

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.

No, because 0871 numbers are a scam to make money from callers.

Q18: Do you agree that a minimum payment amount from each network operator should be £500 per annum? If not, please provide your reasons.

No because this arbitrary charge will be passed on to callers.

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 doesn't try and hide the fact that 0871 is a premium rate number (albeit lower amount than 09x) and that Communication Providers (CPs)/Service Providers do not advertise the 0871 number range as 'national rate' which some CPs currently do this. I believe that ICSTIS was only set up to regulate scams and therefore all these non-geographical numbers (other than low rate 0845 numbers) should be banned in the interest of the consumer. **Therefore the regulation applicable to all of these numbers should be to ban them.**

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?

Yes, ban 0871 numbers and all other over charging rates. Local rate and 0845 numbers are the ONLY fair numbers for BOTH consumers and organisations, and all other charge rate numbers are scams and should be banned. Free call 0800 numbers are an option for organisations who value their customers.

If you do want to continue to support these scams, you can at least discourage scams with missed phone calls/silent calls. To do this, ICSTIS should ensure that companies/organisations using an 0871 does not display via CLI (Caller Display Identity) their 0871 number. Instead, companies/organisations should be forced to display and use free phone, geographical 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. This is fair to both organisations and consumers.

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