

<b>Consultation:</b>	<b>0871 Services</b>
<b>FAO:</b>	Mr Nathan Marshall
<b>Name of respondent:</b>	Steve Walters
<b>Representing (self or organisation/s):</b>	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.

**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, with provision for my comments and suggestions.

**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, with provision for my comments and suggestions.

**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 as 0871 is effectively a premium rate number all service providers should be forced to hold and advertise a geographical or 0845 / 0870 number.

**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, with provision for my comments and suggestions.

**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.**

No.

At this time Ofcom is currently investigating scams on 0870 numbers. Once 0870 loses the revenue share, most companies/organisations are expected to migrate to 0871 and this means scam artists will also do this. The proposal to not address the issue of charging whilst a consumer is held in a queue is not at all in the consumer interest but only in the interest of companies/organisations using these numbers. I believe with the extra revenue possible from 0871 numbers that this is used to ensure that consumers aren't charged for being kept on hold.

It has been stated by ICSTIS that many companies/organisations will use 0871 not for the revenue share (can be as much as upto 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.

Many companies/organisations would not dare move to 09x (not even at 15p/min) because in all likelihood they are aware that consumers are aware that 09x is a premium rate and that this would cause many complaints so instead they have opted for 0871 where revenue still exists but without consumer knowledge that they are in fact ringing a premium rate number (albeit lower amounts) and according to your proposal, being able to gain revenue even whilst consumers are held in a queue. It's possible to be held in a queue for over 20minutes when ringing some companies on their 0870 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.

Also all service providers should be forced to make an announcement when first connected that states how much the call charge is per minute and additionally, where you are in a queue, how long it's estimated before being answered.

This could all be paid for out of the 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.**

Yes, except that 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), companies/organisations should also be obliged to say when they answer the call that "calls will cost 10p/min from a BT landline (other providers may charge more)." This really has hardly any financial impact on the companies/organisations using these numbers in fact the extra 10 seconds or so it takes to say this will cost us consumers but at least consumers would be fully aware that they are paying at least 10p/min.

I state again that I believe all service providers should be forced to make an announcement when first connected that states how much the call charge is per minute and additionally, where you are in a queue, how long it's estimated before being answered.

This could all be paid for out of the revenue from the call.

**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, with provision for my comments and suggestions.

**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, with provision for my comments and suggestions.

**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, with provision for my comments and suggestions.

<b>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.</b>
Yes
<b>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.</b>
Yes
<b>Q18: Do you agree that a minimum payment amount from each network operator should be £500 per annum? If not, please provide your reasons.</b>
Yes
<b>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.</b>
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.
<b>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?</b>
To discourage scams with missed phone calls/silent calls, ICSTIS should ensure that companies/organisations using an 0871 does not display via CLI (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 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.
<b>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.</b>
N/A

Hi

I saw this on the web and wanted to add my comments. I feel all service providers who provide a premium rate message should have to play a message at first connection with the call charges and expected duration and give the option for the caller to disconnect.

Also any providers of 0871 numbers should be obliged to publish a geographical number or lower cost alternative such as an 0845 number.

Regards  
Steve Walters  
IT Consultant