

Consultation:	0871 Services
FAO:	Mr Nathan Marshall
Name of respondent:	Dr Jan Woning
Representing (self or organisation/s):	www.janwoning.com

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, insofar as not conflicting with any of my other answers in this questionnaire
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, insofar as not conflicting with any of my other answers in this questionnaire
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
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 it is mentioned within section 3 of the code that service providers also hold non-premium rate UK customer service numbers but that you currently think 087x numbers are ok. This is a contradiction as 0871 will be premium rate numbers, which is why they will be regulated by ICSTIS. Therefore, it defeats the point of the service provider not holding a non-premium rate number, but yet allow them to hold a 0871 contact number. It is suggested therefore that service providers be required to hold a geographical or 0870 number and NOT 0871 numbers. In other words that holders of 0871 numbers should be required to hold and publish their geographical and other non-premium rate numbers along with the 0871 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, insofar as not conflicting with any of my other answers in this questionnaire
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. ICSTIS state that it has received major complaints concerning 0871 numbers, as has Ofcom, and that, at this time Ofcom is investigating scams on 0870 numbers. Once 0870 loses its revenue share, most holders are expected to migrate to 0871, including the scammer. ICSTIS's current proposal basically does nothing about call queuing: That is, would not serve consumer interests at all, but rather only the interests of companies holding these numbers.

It has been stated by ICSTIS that many holders will use 0871 not for the revenue share (can be as much as 6p/min) but for the advanced network features. If this was true then holders could use other, lower-rate non-geographical numbers such as 0844 and 0845, which offer the same advanced network features without revenue sharing to the holder (at most a small surcharge, retained by the service provider to pay for the advanced network services).

Therefore, the primary interest in using 0871 is for the revenue share. The main issue is that many consumers currently aren't aware that 0871 numbers are premium rate, which is why many 0870 holders have already migrated to 0871.

Many companies would not dare move to 09x (not even at 15p/min) because they know that consumers are aware that 09x is premium rate and would not call such a number. So instead they have opted for 0871 where revenue still exists but without the consumer knowing that he/she is, in fact, ringing a premium rate number (albeit at lower call charges) and, pursuant to your proposal, 0871 holders would gain revenue whilst consumers are held in a call queue. It is not uncommon to be held in a queue for over 20 minutes when ringing some companies on their 0870 numbers now. This equates to £1 in revenue for every call that lasts 20 minutes just being in a queue, without the recipient providing any service in return. For companies receiving hundreds or thousands of calls per day the revenue would drastically add up, providing an incentive to keep callers waiting.

One should think that in exchange for the extra revenue from 0871 numbers, consumers should not be charged for being on hold in a call queue and undue delays afterwards.

Should this be impossible, then the least requirement should be a mandatory announcement upon ringing, stating the expected queue time, allowing the caller to hang up free of charge to ring back later. Again this should be paid out of the revenue from 0871 calls received, which ICSTIS naively believes will really only be used for network features and not to deliberately 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.

Yes, but upon ringing with a mandatory announcement stating (1) the charges per minute for the 0871 call from a BT landline (2) that other providers may charge more, plus an opportunity to hang up free of charge, so that consumers are aware that 0871 is a premium rate number. This should barely have financial impact on the companies using these numbers, while giving consumers an educated choice to either proceed with the call at a premium rate or hang up without being charged.

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

Yes, provided that revenue sharing on 0871 numbers will be prohibited and premium rates will not be charged during the implementation period.

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, insofar as not conflicting with any of my other answers in this questionnaire

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, insofar as not conflicting with any of my other answers in this questionnaire

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, insofar as not conflicting with any of my other answers in this questionnaire

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.

No, the amount should be ten times higher (£5,000) to create a bigger threshold towards migrating to 0871 numbers.

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 (1) clearly states the fact that 0871 is a premium rate number (2) that Communication/Service Providers will be prohibited from advertising the 0871 number range as 'national rate' as some are doing right now and (3) holders of 0871 numbers must obligatory reveal their geographical or other non-premium rate number, in all their media publications, including but not limited to advertisement, web sites, etc.

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?

To combat scams with missed and/or silent calls, ICSTIS (1) should make it obligatory that during calls to consumers, a geographical or other non-premium rate number is being display via CLI (2) prohibit 0871 numbers from being displayed via CLI. This would relieve OFCOM from having to investigate missed and/or silent calls (whether deliberate or not) potentially violating OFCOM rules. According to current OFCOM rules companies making phone calls (sales, marketing etc) must not display numbers costing more than a 0845 number via CLI.

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