

Responses to 0871 Consultation from J Woodward-Nutt, National Consumer Federation.

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, so far as it does not conflict with any of my other answers.

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, so far as it does not conflict with any of my other answers.

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) No.

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 the Code states that service providers may also hold non-premium rate UK customer service numbers. This is illogical as all the benefits of 0871 numbers except revenue sharing can be provided by use of 0870 numbers. It is suggested therefore that service providers be required to hold a geographical or 0870 number in preference to 0871 numbers.

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, so far as it does not conflict with any of my other answers.

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. 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 its revenue share, many organisations are expected to migrate to 0871. Your proposal not to do anything about call queuing is not in the consumer interest.

ICSTIS has stated that many organisations will use 0871 for the advanced network features. If this was true then organisations could use other lower-rate non-geographical numbers like 0845 which offer the same advanced network features. The only advantage of using 0871 is for revenue sharing, and as most consumers are not aware that it is a premium rate number many organisations have already migrated to 0871.

The extra revenue possible from 0871 numbers will encourage more unscrupulous operators to maintain long hold times to maximise revenue. There should be a requirement for an announcement of the charge on such numbers and also a regulation requiring a maximum hold time.

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, provided an announcement of the charge is made on every call as suggested above.

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, as far as it does not conflict with any of my other answers.

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, as far as it does not conflict with any of my other answers.

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, as far as it does not conflict with any of my other answers.

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) Yes, provided that a charge announcement is requires as above.

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 discourage scams with missed phone calls and silent calls, ICSTIS should maintain the current OFCOM rule that organisations making unsolicited phone calls (sales, etc) should not display on CLI any number costing more than the rate of an 0845.

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.

J Woodward-Nutt