

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

<b>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.</b>
Yes, except as contraindicated elsewhere in this response
<b>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.</b>
Yes, except as contraindicated elsewhere in this response
<b>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.</b>
yes
<b>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.</b>
N/A
<b>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.</b>
yes
<b>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.</b>
Yes except that it is mentioned that 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 hence 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 an 0871 contact number. It is suggested therefore that service providers be required to hold a geographical or 0870 number and NOT 0871 numbers.
<b>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.</b>
Yes, except as contraindicated elsewhere in this response
<b>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.</b>
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 unscrupulous companies and scam outfits will use the 0871 numbers as they now use 0870. call queuing must not be permissible on 0871 numbers, it encourages organisations to not only frustrate callers with extended waiting, but also to have to pay for the "privilege". Financial incentives must be to reduce call waiting times, not extend them.

The ICSTIS claim that companies will use 71 numbers to facilitate advanced network services is false as this can be achieved using 0845, without inflated cost being passed to callers. If companies use 71 numbers, they should be made to clearly state it is a premium rate call at the outset, as many people are not aware of this and innocently led to pay organisation while the patiently wait to be answered. Companies are not brave enough to use 09 numbers for fear of consumer backlash, using 71 numbers will just allow them to exploit callers without the callers knowing they are being charged by the receiving organisation.

Communications have always been an overhead on businesses,, they must not be allowed to be passed onto the consumer by this underhanded, conniving and deceitful method.

It should be mandatory that any organisation using 71 numbers must allow for messages to be left with the option for the call to be returned if the caller , having been informed of the cost and maximum duration of the wait, does not wish to pay to be held in a que.

**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, callers by and large do not realise that 0871 numbers are premium rate (albeit lower than 09 numbers) companies must be forced to declare the cost of calls, and, most importantly, that they receive a proportion of that cost. If companies are honourable, why would they not agree to this, after all, they will be getting income for the time it takes to make the announcement.

**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, except as contraindicated elsewhere in this response

**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, except as contraindicated elsewhere in this response

**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, except as contraindicated elsewhere in this response

**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, but the cost of 71 numbers must not be concealed, or falsely described as "National rate" as is sometime done now. Call charges must be clearly stated "up front" with no evasive wording or deceptive wording.

**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?**

Companies using 0871 , or any other premium rate number, should not be allowed to display that number on any caller ID display systems. Missed call and silent call scams already happen where naive and vulnerable people feel obliged to return these premium rate or sales calls at their own expense. Only normal geographical numbers should be allowed on caller ID systems.

**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