

Additional comments:

Question 4.1: Do you agree with the assessment criteria we are proposing to use for our analysis, and in particular the three additional criteria we have identified as relevant?:

yes

Question 4.2: Do you agree that a maximum SC should apply to 09 numbers for the reasons set out above?:

yes

Question 4.3: Do you agree that a maximum SC should apply to 118 numbers for the reasons set out above?:

yes

Question 4.4: Do you agree that a different maximum SC for calls charged on a per call basis and calls charged on a per minute basis is appropriate?:

yes

Question 4.5: Do you agree that we should use the RPI measure of inflation to uplift the BT's current maximum retail price for 09 calls to derive the maximum SC under Option 1?:

no

Question 4.6: Do you agree that we should not uplift the SC caps by inflation on an annual basis?:

yes

Question 4.7: Do you agree that the maximum SC cap should be set exclusive of VAT?:

yes

Question 4.8: Do you agree that Option 2 (a £3 per minute and £5 per call cap) is the most appropriate maximum service charge limit for 09 and 118 numbers? If not, please explain why.:

No.

There is no justification for such a high charge and the fact that these numbers are easily accessed (for example by children) with no prior knowledge of the system may cause exceptional and unnecessary billing.

Question 5.1: Are there any other consumer protection measures we should consider for the 09 and 118 ranges? Please explain why you consider any additional measures you identify might be appropriate. :

Possibly a compulsory preamble (without timing charge) to remind users of the call rate?
Perhaps a no-charge call blocking service would also be of assistance.

Question 5.2: Do you have any comments on our assessment of the costs and benefits of a pre-call announcement on the 09 and 118 range? Please provide reasons for your view.:

See 5.1

Question 5.3: If relevant, please provide an estimate of the likely costs that you would incur if a pre-call announcement were implemented on these ranges, taking account of any benefits it may bring. :

Question 5.4: Do you have any comments on our assessment of the costs and benefits of a consumer opt-in for 09 and 118 numbers? Please provide reasons for your view. :

Question 5.5: Do you have any comments on our assessment of the costs and benefits of time-related notifications on the 09 and 118 range? Please provide reasons for your view. :

Question 5.6: If relevant, please provide an estimate of the likely costs that you would incur if time-related notifications were implemented on these ranges, taking account of any benefits it may bring.:

Question 5.7: Do you have any comments on our assessment of the costs and benefits of dedicated number ranges on the 09 and 118 range? Please provide reasons for your view.:

Question 5.8: Do you have any comments on our assessment of the costs and benefits of an extension of the 30 day withhold period on the 09 and 118 range? Please provide reasons for your view.:

Question 5.9: Do you agree with our assessment that additional consumer protection measures would only be justified if SPs are able to set SCs for services on 09 and 118 with the ranges proposed under Option 3? Please provide reasons for your view, including, if relevant, the measures that you consider would be appropriate.:

Question 6.1: Do you agree that the level of the SC should be set at £5 per call and £3 per minute and that no additional consumer protection measures will

be required? If not, please provide alternative options and evidence to support your preferred option.:

I believe that the cap is far too high.

Question 6.2: Do you agree with our proposals in relation to the timing of our proposals for a maximum SC charge for 09 and 118 numbers taking effect? :

Yes.