

## **ComReg Review of Non-Geographic Numbers (NGNs)** *A Submission by the Citizens Information Board*

### **Introduction**

The Citizens Information Board (CIB) is committed to ensuring that citizens can readily and easily access information and support from both our own range of services and from the widest possible range of State and other services. Many people are heavily reliant on telecommunications in order to exercise their rights as citizens and as consumers, and to access the services and facilities to which they are entitled. We very much welcome ComReg's review of the operation of Non-Geographic Numbering (NGN).

The CIB supports the provision of information, advice (including money and budgeting advice) and advocacy services to citizens on a wide range of public and social services. To do this, we provide direct funding and a range of supports to our delivery services - Citizens Information Services (CISs), the Citizens Information Phone Service (CIPS), the Money Advice and Budgeting Services (MABS), the National Advocacy Service for People with Disabilities (NAS) and the Sign Language Interpreting Service (SLIS) – who in turn provide services to the public. We also provide services directly to the public through our website, [www.citizensinformation.ie](http://www.citizensinformation.ie) and related micro-sites.

### **Citizens Information Services and NGNs**

Telephone-based service provision continues to be an important element of how the needs of our clients are met. CISs, MABS and NAS, as well as the CIB's own offices, both nationally and locally, had until 2011 used Geographic Numbers. These changed in 2012 as a result of a move by CIB to a Wide Area Network (WAN) and to the 076 NGN.

The new telephone and data infrastructure was seen by the CIB at the time as providing a foundation for a range of new developments and for delivering greater effectiveness and efficiencies in the matter of telecommunications for all sections of the service. The new 076 numbers were also used by CIB as a branding/public information device aimed at increasing public awareness of its various supported services and at encouraging usage and access.

### **Difficulties reported by CIB delivery services in relation to the 076 NGN**

Difficulties experienced by clients in respect of the 076 number, as reported by CIB delivery services, are worth noting since they are likely to be broadly illustrative of public perceptions and experience of NGNs. These perceptions and experiences, whether based on the factual situation or not, have a negative influence on people's behaviours and inhibit usage of the 076 service. The following are some of the main difficulties identified:

- 1) People ask regularly how much are they being charged or ask if there is a normal national rate telephone number that they can use.

- 2) The cost of the 076 varies according to the telecommunications provider -- some charge the national rate, some do not;
- 3) Clients report that when using the 076 number, their credit either runs out or they become anxious that it will run out – this means that services are under pressure to deal with the query quickly or to offer to ring the person back;
- 4) Many clients state that they do not know whether or not the 076 number is included in their telecommunications package or whether it is considered to be a landline number or not;
- 5) Some clients report additional charges on their bills for ringing the 076 number;
- 6) When CIB delivery services make a follow-up telephone call, some people do not answer because they do not know who is calling them, are fearful that it is some unsolicited product selling call or some scam or, in the case of MABS clients, a call from a lending institution to which they owe money;
- 7) When people do not know how much an 076 call is going to cost , they are afraid to ring the number and state that they would much prefer to ring a geographical number that they recognise – this may mean that people sometimes do not contact a service in the first instance or return follow-up calls from CIS or MABS;
- 8) The 076 option as the only telephone option available may inhibit people contacting a service for the above reasons.

#### **Non Geographic Numbers: The overall experience of CIB delivery services**

The experience of CIB delivery services are broadly similar to the ComReg research findings and can be summarised as follows:

- 1) There is a general reluctance on the part of the public to use NGNs based on a lack of familiarity with the specific costs relating to calling these numbers from either their landlines or mobile phones;
- 2) Many people feel much more comfortable calling a landline or mobile number with which they have familiarity rather than an NGN;
- 3) There is widespread suspicion on the part of the public that NGNs are expensive and typically involve a system which quickly uses up their mobile phone credit;
- 4) Many consumers do not differentiate between the different NGNs and do not know the cost of calling these numbers;

- 5) Some people report thinking that they were using a Freephone number and experiencing surprise and annoyance when they realise that they were paying a high tariff for the call;
- 6) NGNs are frequently not included in mobile phone packages and people end up paying significant additional costs;
- 7) Some telephone packages allow the customer to call regular landlines or mobile numbers free of charge but apply a charge for any NGN – people only become aware of this ‘after the event’;
- 8) There is a major problem for many people where no ‘landline’ number is provided in relation to contacting essential services, e.g., Revenue for the PAYE sector (all enquiries); Workplace Relations Commission, Residential Tenancies Board, the Central Registration Medical Card enquiry line and some sections of the Department of Employment and Social Protection (DEASP), SUSI, for 3<sup>rd</sup> Level Grant information;
- 9) Clients regularly report trying to contact various Government Departments using ‘Lo-call numbers’ only to find that being put on hold resulted in them losing the call because their mobile phone credit ran out;
- 10) Most utility providers provide only an 1850 number for people to provide a meter reading, query a bill, report a loss of service or an emergency;
- 11) Many people who are fully willing to and capable of conducting their own business on the phone come to CISs in order to avoid not only having the call cut-off/dropped while ‘on hold’ to an NGN but also because they have used up all their remaining credit.

### ***Vulnerable groups***

People who are financially vulnerable who need to live on a very tight budgets are particularly disadvantaged by the preponderance of NGNs, including, in particular, those whose only income is a social welfare payment or people experiencing over indebtedness.

### **CIB Response to ComReg Proposals**

The results of ComReg’s research regarding consumer attitudes and perceptions of NGNs are a cause for concern. As already indicated, the feedback from CIB delivery services suggests that consumer attitudes to NGNs are somewhat negative and that the lack of transparency about costs discourages use of NGN numbers.

We concur strongly with ComReg's analysis of the particular challenges that the current NGN position poses for vulnerable groups of people. In particular, we note the following points:

- The fact that high retail charges for NGN calls could have a particularly negative impact on some more vulnerable consumers for whom NGNs provide important access to essential services (e.g. paying bills) or social services (e.g. healthcare, social welfare);
- The likelihood that such additional costs would disproportionately impact on lower income households and on those with limited alternative communications options;
- While rural consumers are more likely to require access to voice-based telephony services, they are more likely to avoid calls to NGNs;
- People living in a rural area, unfamiliar with computers or smartphones and not having an Internet connection, may be impacted upon negatively if the retail charge for contacting their bank or other basic service by phone is relatively high.

We note the finding referenced in the ComReg Report of the 2017 Roscommon Older People's Council report (which the CIB funded) that:

*"Irish consumers are potentially paying up to €5 a time to phone so called "low cost" telephone numbers like those beginning 1890, 1850, 0818 and 0761 - even though an alternative number may also be available. Many organisations and businesses are encouraging their customers to ring their LoCall 1890, or 1850 Callsave, or 0818 National Call telephone numbers."*

CIB shares the ComReg view that the *status quo* regarding NGNs results (or can result) in a number of negative impacts on consumers and their access to information and services.

- That the pricing arrangements for NGN calls lack transparency
- That charges for NGN calls are, in many instances, very high
- That Pay as You Go consumers are most likely to experience high call costs
- That consumers can be discouraged from calling NGN telephone numbers due to the reality of and/or perception of high costs
- That the range of NGN types contributes to a sense of confusion amongst consumers

CIB agrees with ComReg's proposal to introduce the 'Geo-linked' NGN measure by replacing the current retail tariff General Authorisation conditions for '1850', '1890', '0818' and '076' NGNs with a new 'Geo-linked' retail tariff General Authorisation condition of use. We believe that the proposed change is necessary in order to provide callers with a more reasonably and fairly priced system that will, in particular, act to the benefit of people who are most likely to be socially and financially vulnerable. We also feel that the proposed

change will, in addition, act to dispel consumer reluctance or negative attitudes to NGNs, and thereby encourage usage of telephone-based services.

While CIB supports the proposed reduction in the range of numbers as a positive measure for citizens and consumers, CIB notes that the transitioning out of 076 numbers adopted over the past five years will, from a public service organisation perspective, have significant cost implications.

CIB agrees with ComReg's proposed NGN transparency measures on the basis that consumers have a right to clear and transparent information regarding the costs and conditions attaching to all services that they use. In particular the requirement for providers to publish transparent, comparable, adequate and up-to-date information on applicable prices and tariffs in a clear, comprehensive and accessible form is crucial. Also central is the proposed requirement for providers to provide applicable tariff information to subscribers regarding any number or service subject to particular pricing conditions. A requirement that such information be provided immediately prior to connecting the call should be built in to the regulatory framework.

#### Key points

- CIB supports ComReg's proposals to retain the Freephone 1800 and link NGN numbers to geographic numbers for the purpose of pricing and to reduce the total number of NGN ranges following a 2–3 year transitional period.
- This transition period will be necessary for technical and public information purposes and the proposed transition period should be adequate.
- In the interim period, services requiring the use of NGNs should provide details of specific costs implications in relation to calls from both landlines and mobile networks.
- CIB agrees with ComReg's proposed NGN transparency measures – consumers have a basic right to clear and transparent information regarding the costs and conditions attaching to all services that they use.
- CIB urges that all telecommunications providers should be required to only charge NGN numbers at a national rate charge.
- Any new Geo-linked system will need to be proactively promoted by ComReg with clear and comprehensive information about tariffs.
- There should be a requirement on all telecommunication providers to provide specific details of what is and is not included in packages. ComReg could assist by publishing those details on its website.