



Information Policy & Compliance

[bbc.co.uk/foi](http://bbc.co.uk/foi)

Ganesh Sittampalam

Via email: [request-3862-1448eb08@whatdotheyknow.com](mailto:request-3862-1448eb08@whatdotheyknow.com)

18 March 2009

Dear Mr Sittampalam,

### **Freedom of information request – RFI20090277**

Thank you for your request received on 07 February 2009 seeking further information from TV Licensing. Your request is being dealt with under the Freedom of Information Act 2000 (“the Act”).

I note this request is being made in the context of the following:

- RFI 20081156 – this request was received from you on 29 October 2008 and contained a request for all geographic numbers corresponding to the following non-geographic phone numbers on a recent communication I had from TV licensing: 0844 800 5899, 0844 800 6760, 0844 800 6778 and 0845 602 2320. A response was sent on 21 November 2008 withholding the information under section 43 (“commercial prejudice) of the Act as its disclosure under the Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).
- IR 2008040 – in this Internal Review of the BBC’s response to RFI 20081156 you requested that the BBC revise its stance because, in your view, they had *not considered the public interest test appropriately*. A decision notice was issued to you on 21 January 2009 which re-examined the BBC’s original response and released the geographic equivalent of one of the numbers in your request (0844 800 6778).

Turning now to your latest request, you have asked the following:

*I request a list of all numbers that calls to the above listed numbers [0844 800 5899, 0844 800 6760 and 0845 602 2320] can be diverted to, whether or not this diversion only happens at certain times of day or under certain circumstances.*

*Please remember that if you feel that any exemptions apply to this request, you must consider them specifically in terms of this request. In particular, I consider that the following public interest arguments exist in favour of release of this information:*



- People outside the UK are unable to call 0844 or 0845 numbers. This might be necessary when dealing with the affairs of UK property, for example.
- It often costs more to call the 0844/0845 number than the equivalent geographic number, particularly for people using mobile phones or who live in the local area of the geographic number. Since you receive a rebate from the calls, they are indirectly paying you to speak to you.
- You strongly emphasise the use of the telephone to contact you. For example, in a recent letter I received, it stated that "If you have a licence for this address in someone else's name, please call our License Confirmation Line,...", without suggesting any other means of contacting you that applied to these circumstances. I would note that in this particular situation people are being expected to spend their money and time on remedying a defect in your own systems, since you could easily verify for yourselves that a licence is held at the address and that the address is very likely to be a single household.
- There is considerable public concern about organisations making money from these kinds of numbers, as evidenced by the existence of websites such as [www.saynoto0870.com](http://www.saynoto0870.com)

Although I realise that any numbers that were released would not necessarily work at all times, they would still provide an alternate means of contact for people who did not wish to pay extra for the convenience of the "call plan" numbers or who cannot use them.

As you have previously refused to release information of this nature on both health and safety and commercial prejudice grounds, I remind you that the ICO has rejected your attempt to apply these exemptions in a very similar case. If you nonetheless feel that they apply, please provide a detailed explanation of how this case is different.

#### Recent ICO decision

I assume in your last paragraph that you are referring to a recent Decision Notice issued by the Information Commissioner's Office (ICO) on 11 December 2008 in relation to a request received by the BBC in July 2006 for "the equivalent geographical number of all ... [the BBC's]...0870 numbers". This decision notice is available at:  
[http://www.ico.gov.uk/upload/documents/decisionnotices/2008/fs\\_50133140.pdf](http://www.ico.gov.uk/upload/documents/decisionnotices/2008/fs_50133140.pdf).

In its Decision Notice of 11 December 2008 the ICO stated (in paragraph 23) that the BBC does not in fact hold the information sought as regards non-geographic numbers accompanied by a call plan. This was because numbers accompanied by call plans "may be directed to an interactive voice response system or to a BBC geographic number. Accordingly, there is not an equivalent geographical number held by the BBC for its non-geographic numbers with a call plan." However, this was not the case for non-geographic numbers which are not accompanied by a call plan. Hence the BBC was only required (in paragraph 47) "to supply the complainant with the equivalent geographic number of its non-geographic numbers not accompanied by a call plan."

#### Internal Review IR 2008040

In accordance with the ICO decision notice outlined above, when the BBC responded to your request for an Internal Review an examination was undertaken to determine whether the four numbers for which you had requested the geographic equivalents were accompanied by call plans. The BBC's view was that three of the numbers specified (0844 800 5899, 0844 800 6760 and 0845 602 2320) were accompanied by such

plans. However, the fourth number (0844 800 6778) was not. The BBC's response to your Internal Review therefore released the geographic equivalent of the fourth number to you.

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Turning now to your latest request for a list of all numbers that calls to the above listed numbers [0844 800 5899, 0844 800 6760 and 0845 602 2320] can be diverted to. I can confirm that these numbers are operated by Capita Business Services Ltd and Revenues Management Services (RMS). I can therefore confirm under Section 1(1) of the Act that this information is not held by the BBC and under section 3(2) of the Act that this information is not held by these companies on behalf of the BBC.

### **Appeal rights**

If you are not satisfied with this response you have the right to an internal review by a BBC senior manager or legal adviser. Please contact us at the address provided, explaining what you would like us to review and including your reference number. If you are not satisfied with the internal review, you can appeal to the Information Commissioner. The contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone 01625 545 700 or see <http://www.ico.gov.uk>.

Yours sincerely,

**Natalie Saunderson**  
**Policy Adviser**  
**BBC TV Licensing Management Team**