



Information Policy & Compliance
bbc.co.uk/foi

Mr Ganesh Sittampalam

Via email: xxxxxxxxxxxxxxxxxxxxxx@xxxxxxxxxxxxxxxx.xxx

21 November 2008

Dear Mr Sittampalam,

Freedom of information request – RFI20081156

Thank you for your request received on 29 October 2008 seeking further information from TV Licensing. Your request is being dealt with under the Freedom of Information Act 2000 (“the Act”). In your request you asked the following:

I request a list of 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

0845 602 2320

If no direct equivalents are available then please provide the most appropriate alternatives.

I can confirm that we hold the information that you have requested. However, I am withholding this information under s43 of the Act. Section 43 states that information will be exempt under the Act if its disclosure under the Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).

The disclosure of this information would be likely to prejudice the commercial interests of the BBC since the BBC has entered into a contract with Capita Business Services Ltd and Revenue Management Services (RMS) regarding the provision of the TV Licensing call centres. Capita and



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RMS in turn purchases telecoms services from British Telecom (“BT”) and Telewest respectively to deliver calls to the contact centres. Releasing this information may therefore have the following consequences:

- Releasing the information would create an operational risk, in that the telephone switch would be compromised. This could be in the form of a lobby group choosing to ‘attack’ the switch by calling directly and thus circumventing all the protection offered by the Call Plans of BT and Telewest. Capita, RMS and TV Licensing use over 50 different numbers, a handful are in use continually, the rest are used for brief periods in support of specific campaigns. The Call Plans permit Capita and RMS to balance the call volumes received across the switch depending on forecast call volumes per number or campaign. In this way Capita and RMS are able to ensure that the absolute maximum number of callers can get through across all live numbers.
- Capita and RMS rely on the ability to report on traffic across non-geographic numbers to manage Service Level Agreements (SLA). If callers used geographic numbers Capita and RMS could not report accurately on call volumes; no reliable statistics would be available, making it immensely difficult for Capita and RMS to manage their contracts with the BBC.
- The Reserve Plans of Capita and RMS (that include network Interactive Voice Responses) allow them to deal with unplanned surges of telephone calls by using pre-recorded messages. This service would not be able to function for calls delivered directly to geographic numbers – again making it more difficult for Capita and RMS to manage the services within SLA.

The three reasons above mean that Capita, RMS and the BBC would suffer commercial harm if the numbers were released; Capita and RMS would be less able to deliver to the BBC and the BBC would receive a lower quality of service for the licence fee payer.

I am satisfied in terms of section 2(2) of the Act that in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information. I have considered the public interest test in the section on why information has been withheld below.

It may interest you to know that TV Licensing uses 0844 numbers because such numbers allow calls from anywhere in the country to be routed to available advisers across TV Licensing’s sites. This enables the call to be answered quickly and by the most appropriate adviser thus saving callers substantial amounts of time.

TV Licensing believes that 0844 numbers make TV Licensing’s charging policy clear for callers to understand because there is one capped cost for calls, at a maximum of 5p per minute from a BT landline (as you suggest in your request). Please note that, as well as the cost of the call itself, there is also an additional connection charge for most calls, with the rate depending on individual operators and packages. For some BT customers this is 6p per call. Given that the average length of a call to TV Licensing is less than 3 minutes, this makes the cost of a call to TVL from a BT landline approximately 21p (3 minutes * 5p plus 6p connection charge), less than the cost of a second class stamp at 27p. TV Licensing believes this is a clear and transparent option for their callers and offers them good value for money.

I should also emphasise that neither the BBC nor TV Licensing receives profit from 0844 or 0845 telephone calls. However, TV Licensing does receive a rebate from their use. This rebate received from BT and Telewest in respect of calls made to 0844 and 0845 numbers is offset

against TV Licensing's operational costs and helps to ensure that the costs of collecting the licence fee are kept as low as possible. The rebate received for using these numbers in all cases is a small amount compared to the total phone costs incurred by TV Licensing.

Finally, I would highlight that phoning an 0844 or 0845 number is not the only way of contacting TV Licensing. Methods such as post and e mail can also be used, and these are set out on the TV Licensing website at <http://www.tvlicensing.co.uk/aboutus/howtocontactus.jsp>. Please note that contacting TV Licensing via the website is free of charge.

Why information has been withheld

I am required under s 2(2) of the Act to assess whether the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

The following factors are in favour of disclosure:

1. ensuring that public funds are being appropriately applied, that is:
 - a. ensuring that the TV Licensing system is being efficiently run; and
 - b. ensuring that value for money is being obtained.
2. ensuring a high standard of debate around the licence fee collection, currently being generated in response to the BBC Trust's open consultation (available at http://www.bbc.co.uk/bbctrust/consult/open_consultations/tv_licence.html), by placing as much information as possible into the public domain.

I consider that the above public interest factors in favour of disclosure are served by the following:

1. The attached document *BBC TV Licensing Costs of Collection*
2. The fact that the BBC is required to satisfy the National Audit Office ('NAO') as to the value for money of the collection and enforcement arrangements and is accountable for the economy, efficiency and effectiveness of such arrangements. NAO's most recent audit is published at http://www.nao.org.uk/publications/nao_reports/06-07/0607183.pdf.
3. The fact that the BBC has reduced the cost of collection from 6.2% of the total licence fee collected in 1991/2, when it took over from the Home Office, to 3.6% for the financial year 07/08. This demonstrates that the TV Licensing system is being efficiently run. This and further related information is available in the BBC's *Annual Report and Accounts* (see www.bbc.co.uk) and the *TV Licensing Annual Review* (see http://www.tvlicensing.co.uk/pdfs/AnnualReview_en2008.pdf?r_exit_link=d_pdf_download).

There is hence a greater public interest in ensuring Capita manage call volumes efficiently on behalf of the BBC. I am therefore satisfied, in terms of section 2 of the Act, that in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest (outlined above) in disclosing the information.

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

I hope this response is helpful.

Yours sincerely,

Natalie Saunderson
Policy Adviser
BBC TV Licensing Management Team