

Dear Peter

While we don't have responses to the specific questions asked at the end of the Business Plan we would like to make the following comments, as per Question 5.

One of the bullet points in 3.1.3 the Plan includes:

"best support the experience of consumers when they do contact us to report issues with services"

When we receive a request for Information all we have is the calling phone number. If we were to be given the caller's contact details then if we felt it was appropriate we could offer a refund. This would improve the customer experience, in many cases this is all a caller is seeking. This wouldn't preclude PSA from taking further action if it was required.

In Annex B, the 2019/20 calculation includes:

"our assumption for 2019/20 at this stage is that continued growth in operator billing will more than offset declines in other market areas, and that the levy can be based on an estimated market size of £480.0m."

The growth in Operator Billing is being slowed and the declines in other areas are being increased by increased abuse by larger Communications Providers of processes intended to prevent consumer harm, an often cited reason is unspecified breaches of the PSA guidelines that when challenged are poorly supported, if at all. This is damaging Service Provider confidence in Phone Paid services, deterring innovation and reducing and sometimes even preventing participation in the markets. We would like the PSA to at least make a statement about this issue, confirming who's responsibility it is to take action on breaches.

Finally, a significant cause of consumer harm is the access charges levied by some communications providers. We know from complaints that we receive that consumers aren't fully aware of them and this leads to bill shock, some CPs access charges are greater than a number of Service Charges. While this is outside the direct remit of the PSA we would welcome their input to any future Industry discussions or consultations around this topic.

We also fully support the points made in the AIMM response to the Annual Plan consultation.

Regards

Alan Partington  
Telecom2 Ltd.  
Email: [alan.partington@telecom2.net](mailto:alan.partington@telecom2.net)  
Main: +44(0)208 114 1000  
Mobile: +44 (0)771 501 3578  
Fax: +44(0)208 114 1006

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