

Q1. As someone whose only contact with subscription services is that I was subscribed to a service without my knowledge, I feel that compliance, i.e. preventing consumer harm, needs to be a priority. It appears from the phrasing of the objectives to be regarded as a lower priority than "innovation".

Q2. The existing services seem to be easily accessed by scammers and hard for consumers to contest. Elements of a solution could be:

1. The operators are required to obtain consent directly from the consumer, e.g. Acme Videos want to bill an O2 customer. Before O2 can bill the customer, they, i.e. O2, must text the customer giving full and clear details of the charges. The customer must respond with CONFIRM before any charges can be made to their bill.

2. In the event of a complaint the operator must be able to provide clear evidence that the above process has been followed or refund the customer in full.

Q3. As we have seen from the current system, any exemptions will be gamed. Exemptions might be appropriate in exceptional cases, provided that strong safeguards are in place. Any exemptions must have independent adjudication and money held in bond to ensure that consumers can access redress.

Q4. My work phone was subscribed to a [REDACTED] service. I was unable to get it stopped until, after 4 charges [REDACTED]ly gave me unsubscribe information. I suspect that it would have cost my employers more in staff time to chase a refund than they would have got back. I think it likely that they didn't bother and the scammers probably rely on that for a significant portion of their revenue.

[REDACTED]