



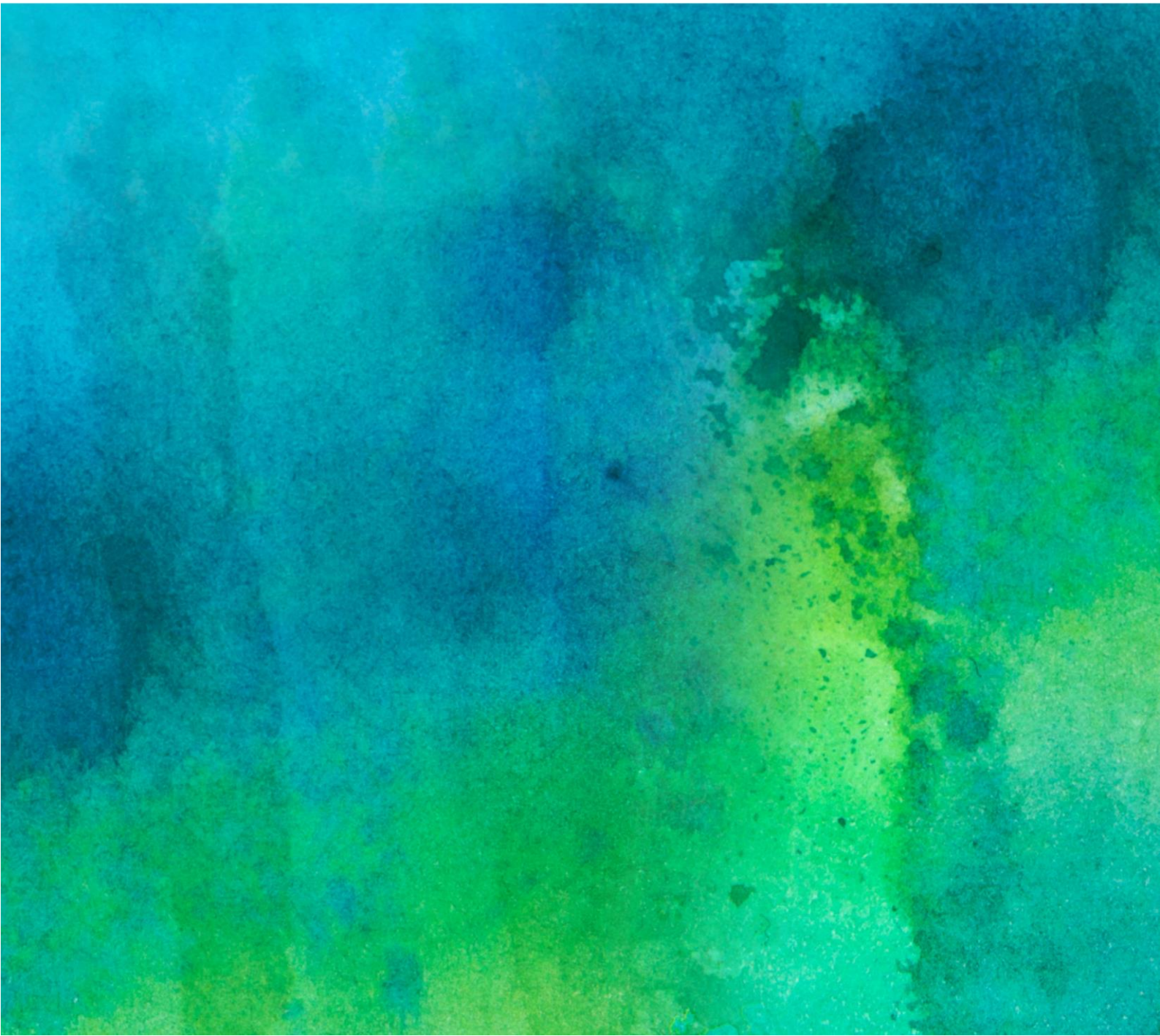
**Infomedia**

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# **Consultation on Digital Marketing Guidance Note - Response**

September 2018

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## ABOUT INFOMEDIA

Infomedia is trusted by brands and carriers globally to provide a secure platform to process transactions, using Direct Carrier Billing (DCB) following a 20 year history of providing technology and services supporting premium rate services to the telecommunications market in the UK and abroad. Our platform connects carriers and content providers globally with a reach of over 500m customers. Our frictionless experience powered over 60m transactions in 2017 alone. Our mission at Infomedia is to provide the People, Process and Platform to drive maturity of the global DCB ecosystem.

**Our Processes** – We believe that DCB can only thrive as an industry if there is customer trust and all participants in the value chain act with integrity. We highly vet all of brands to ensure we only deliver premium content to the carrier and end user.

**Our Platform** – Our platform has been built from the ground up to securely integrate billing systems between carriers and merchants to maximise revenues and better monetise mobile content.

**Our People** – Our team of UK-based engineers, designers, analysts and marketers have been working with carriers and brands to monetise content for more than 20 years giving us first hand insights and expertise.

## OUR RESPONSE

This response to the Payment Services Authority Consultation on Updates to the Digital Marketing Guidance and Annexes addresses three key points Infomedia would like to raise in response to the proposed Guidance Note Annex.

There are three areas of feedback we wish to raise as set out below.

If you have any questions about this response please contact Iain Lill, Head of Legal & Regulatory Affairs:  
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## GOOGLE FOCUS

In our view the Annex is overly focused on Google Ads in relation to the Direct Media Buy (DMB) guidance. It is of course undisputed that the largest majority of DMB traffic is via Google Ads, however there are other platforms which our partners are making increased use of. In August 2018 the approximate market shares for DCB traffic ads was 85% Google Ads, 11% Other DMB Web Platforms, 2% in-app (DMB) and 2% Social media (DMB).

Whilst it may be appropriate for the PSA to provide guidance directed at usage of Google Ads it should not exclude other DMB platforms and therefore we believe the Annex should make greater reference to the principles of DMB advertising control such as targeting and exclusion, which will be executed differently in different platforms, before diving into the detail of the tools provided by Google specifically.

## L1 EXPECTATIONS

Under the heading 'Roles and responsibilities in Direct Buy Marketing' (paragraph 3) L1s are directed to check and monitor online traffic to validate L2 processes for advertising control. This is an onerous burden on L1s who typically will have no capacity or skillset in monitoring advertising traffic; L1s typically only having sight of customers who proceed to engage with a payments process. This requirement would involve L1's securing experienced advertising recourses for no reason other than monitoring together with significant technical resource to integrate advertising traffic monitoring into their systems. Furthermore, marketing traffic is commercially sensitive to L2s who invest considerably in this aspect of their business and are justifiably concerned in exposing this data in real time to third parties, which would be the requirement if L1s were to actively monitor that traffic as suggested in the proposed drafting.

In our view the wording of this section should be modified to better reflect what we believe is a proportional approach to advertising control.

We believe an appropriate guidance drafting would be: *L1s should audit the effectiveness control methods for Direct Buy Marketing used by their L2 partners from time to time and maintain good records of such audits.*

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This drafting removes the requirement to implement a direct data feed of advertising traffic for monitoring (which is onerous for L1s) and replaces it with an audit requirement which encompasses a periodic but in depth examination of L2 data, which could be onsite at the L2 to preserve commercial confidentiality whilst still delivering to the requirement of maintaining ongoing DDRAC.

## ‘COMPANIES HOUSE’

On Page 6 as part of the ‘Due Diligence’ section the examples of types of information expected to be collected in a DDRAC process includes a reference to ‘current entry in the Companies House register’. Given that a significant number of content providers are based overseas we suggest this should refer to current entry on company registers of territories in which business are incorporated.