

## **Action 4 response to Consultation-on-new-Special-Conditions-for-Directory-Enquiry-Services**

Action 4 welcomes this opportunity to respond to your PSA Consultation on new Special Conditions for Directory Enquiry Services.

As a membership driven trade association representing commercial businesses operating within the Premium Rate telephony sector we are starkly aware that effective regulation is intrinsically linked to the good levels of industry and consumer trust, and in turn a buoyant industry. Key to this effective regulation and protection is not making onerous demands on commercial entities, however in the Directory Enquiry (DQ) arena we commend those operators like BT who have sort to limit bill shock. In terms of declining revenue one wonders if clarity as to costing would not increase the use of these services, within the demographic who do use these services mainly the elderly and vulnerable. We are sure many relatives will tell their elderly or vulnerable relatives not to use DQ due to cost. These services when operated solely by BT had defined costs, so perhaps price uncertainty and bill shock is leading to non-use not just new technologies.

### **Proposed special Conditions:-**

**DQ1** Where DQ services are promoted using IVR messages, or other means, on a number classed as geographic in Ofcom's numbering plan, only numbers that are active and already in use for purposes other than such promotions must be used.

**DQ2** Prior to any onward connection being made by a DQ provider, the consumer should be clearly informed of the cost, and have the opportunity to decline the connection, whether by hanging up before they are connected or otherwise. If the consumer declines this option, they should be provided with the requested number at no additional charge.

All services must have rules equally applied to them. And we agree with both of your suggested proposed special conditions (**DQ1 and DQ2**)

**Q1 Do you agree IVR-based promotions of DQ services on geographic numbers should only be done on numbers that are active and used for other purposes? Do you agree that the proposed requirement will not impact on the promotion of legitimate DQ services? If not, are you able to provide evidence to demonstrate an impact on legitimate DQ services?**

We agree with PSA's stance to protect the consumer, legitimate operators should not be impacted.

**Q2 Do you agree that mandated provision of pricing information upon onward connection will not impact ongoing provision of either DQ services or the consumer experience when using them? If not, please provide supporting information.**

We agree that pricing information must be given to consumers, and this should be on any promotion by whatever medium. However in light of the fact that DQ services have stopped advertising so much, and that neither you, nor Ofcom want to insist on forced pre announcement's, how will you police this?

This still means there is a reliance on the service provider to warn consumers of the cost, how can you ensure this will happen? Meaning you will have to rely on either monitoring by PSA or receiving complaints from consumers.

We thank you for the opportunity to respond to this consultation.



Suzanne Gillies  
CEO