



The Phone-paid Services Authority: Consultation on new Special Conditions for Directory Enquiry Services

Response from The Number UK Ltd

22nd August 2018

Introduction

The Number UK Ltd (TNUK) welcomes this consultation on measures that can be taken by the PSA to address the risk of consumer harm in the Directory Enquiry (DQ) sector and the connected incidence of fraudulent scamming in the market. The two new Special Conditions proposed by the PSA should provide an effective increase in consumer price awareness and further protection against fraudulent activity on geographic numbers used to promote calls to DQ services.

The PSA acknowledges the fact that its proposals are complementary to the proposals made by Ofcom following its review of the DQ sector. TNUK has submitted a comprehensive response to the Ofcom consultation, which includes many subjects relevant to the review carried out by the PSA and subsequent proposals. This document will refer to that response as appropriate and encourages the PSA to read it for further detail and analysis.

Although, as the PSA identifies, the DQ market is declining at a significant rate, TNUK believes strongly that there remains a group of consumers for whom the ability to call a DQ number, be answered very quickly and receive accurate information is extremely valuable. These may be people less inclined to use other methods to access information or they value speed of response much more highly. The latter group includes business users, of which TNUK serves hundreds of thousands on an annual basis. TNUK seeks to protect its ability to offer a fast, high quality service to its users for as long as they wish to continue dialling one

of the range of DQ services provided. As the PSA and Ofcom acknowledge, complaints relating to DQ services are extremely low in number. As Ofcom acknowledges in its market analysis, customer satisfaction with DQ services is high. TNUK consistently supports the promotion of consumer price awareness, positive complaint handling, generous refunding processes and quality improvement.

Comments on the text

Regarding the observations the PSA makes about DQ user awareness of service and price differentiation in the DQ market (section 20 in the consultation document), TNUK believes that there is a significant degree of variation in quality and features offered between the main UK DQ services and cautions against the assumption that nothing to do with quality differentiation is known to consumers. Although the data collected by Ofcom suggests very low levels of deliberate choice, the surveying performed only produced a small sample size and many respondents were referring to DQ calls made well into the past, which results in recollection reliability issues. These issues are serious enough to undermine the validity of Ofcom's assessment of the DQ sector and any reliance on it for regulatory proposals.

The consultation document refers to TV advertising (section 22) and TV promotion of related brands, which may serve to remind consumers that particular DQ services exist. Where this occurs, it should not be referred to as 'limited TV advertising' by a service provider such as TNUK, because it is not the advertising of a DQ service at all, regardless of the brand association.

In relation to the observations made in section 26 of the document, TNUK has made significant levels of investment in training of agents and maintenance of databases as well as brand development and recognition. TNUK also offers a variety of DQ services, including cheaper and simpler offerings along with a free service on an 0800 number.

In section 29 the PSA refers to current guidance and says that 'most providers' follow it. TNUK is completely compliant and would not accept a lesser standard and expects this to be true of any reputable DQ provider.

Answers to questions

Question 1

TNUK agrees with the proposal made by the PSA regarding IVR promotion on geographic numbers and that it will not have any impact on the promotion of legitimate DQ services. TNUK is strongly supportive of all the PSA's investigative and enforcement work in this area and welcomes any measures considered helpful to eliminate the kind of malpractice and deliberate fraud described in the consultation document.

Question 2

TNUK agrees that the mandated provision of pricing information upon onward connection, with which it already completely complies, will not impact the ongoing provision of DQ services and the consumer experience of using them. Indeed, TNUK currently provides the market leading DQ service and the clear provision of this pricing information is a part of the guaranteed service callers receive. The information is provided by automated message prior to the onward connect portion of any call. If a user declines to continue at that point, directory information will have been provided by the normal methods associated with fixed or mobile calls (voice notification and/or text message).

As mentioned in the paragraphs above, much more discussion of proportionate and appropriate responses to consumer issues in the DQ market is included in TNUK's response to the Ofcom consultation. The PSA's proposals are good changes that help enable the continued existence of a well performing, competitive DQ market serving the needs of UK consumers.