

■■■■ response to PSA consultation on regulatory changes to phone-paid subscription services

■■■■ do not have any specific objections to the proposed changes, as the majority have already been implemented.

It would be useful to have more data around complaints and feedback on subscription services, in terms of whether the complaints are higher on weekly or monthly services and also a breakdown of services operating behind password or pin verification to demonstrate this is addressing the problem.

As discussed in our meeting we can see a much higher payment completion when users go through the pin / password flow and it would be good to demonstrate this to industry through breaking down the complaint stats.

SS5

- use of a password system, the password being selected and controlled by the consumer

■■■■ have received queries from customers asking if they can implement Facebook / Google logins as the secure password system. We need clarification as to whether this will be considered robust and accepted, as in many cases these details are stored on computers / phones and may auto-fill based on the users preferences. Should the password system be standalone from other options?

- expire within one minute of the PIN being received to the consumer's handset

■■■■ we do not think this is a realistic timescale, there could be MNO delays to pin delivery in busy times which means the consumer gets caught in a loop of having to resend the pins. Having reviewed a number of pin authentication services the minimum I found was 10 minutes but most were between 30 minutes and an hour.

■■■■ have the ability to expire the user session if the pin is not entered within 1 hour (which can be customised to a shorter time frame). We think this should be included as an option, so either expire the pin or the payment session.

■■■■ Pin flow

■■■■ currently support a flow where the pin is displayed on the payment screen to then be entered by the consumer, rather than a pin SMS - will this be allowed or is it to be mandated to be a pin SMS - we need clarification on this point so we can amend any services as required.

We don't have any additional feedback at this time.