

Consultation response form

Consultation 2, on changes to regulatory framework for Information, Connection and Signposting Services (ICSS) –October Update, Annex B

Please complete this form in full and return by email to consultations@psauthority.org.uk or by post to Sarah-Louise Prouse, Phone-paid Services Authority, 40 Bank Street, London, E14 5NR.

Full name	██████████
Contact phone number	07974 378401
Representing	Organisation (delete as appropriate)
Organisation name	aimm – Association for Interactive Media and Micropayments
Email address	██████████

If you wish to send your response with your company logo, please paste it here:



We plan to publish the outcome of this consultation and to make available all responses received. If you want all or part of your submission to remain confidential, please clearly identify where this applies along with your reasons for doing so.

Personal data, such as your name and contact details, that you give/have given to the PSA is used, stored and otherwise processed, so that the PSA can obtain opinions of members of the public and representatives of organisations or companies about the PSA's subscriptions review and publish the findings.

Further information about the personal data you give to the PSA, including who to complain to, can be found at psauthority.org.uk/privacy-policy.

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how the PSA handles your personal information and your corresponding rights, please see our Privacy policy at psaauthority.org.uk/privacy-policy.

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential?	Delete as appropriate: No
Your response: Please indicate how much of your response you want to keep confidential.	Delete as appropriate: N/A
For confidential responses, can the PSA refer to the contents of your response in any statement or other publication? Your identity will remain confidential.	Yes/No (delete as appropriate) N/A

Your response

aimm welcomes the opportunity to respond to the Phone-paid Services Authority (PSA) consultation on changes to the regulatory framework for Information, Connection and Signposting Services (ICSS).

To assist aimm in providing a comprehensive input to the Phone-paid Services Authority, aimm communicated with its Members in the following manner;

- Written input from Members
- One-to-one discussions

Information gathered from all those who submitted feedback is presented below.

aimm Members who operate in the Phone Paid Services markets are broadly split into seven categories although there is some overlap inside individual Members' businesses.

Fixed Line Networks who are often Fixed line L1

Mobile Networks,

Mobile L1 aggregators,

L2 providers of traditional PRS services (fixed line, PSMS, and DCB),

Broadcasters (who are often L2 providers),

Charities and Charity enablers (who are often L2 providers) and

Industry Support companies

aimm sought responses from Members across areas of industry affected by the proposals in this consultation and in this paper varying views are represented.

Some of aimm's Members may input their response directly to the PSA through their regulatory staff or regulatory representatives. Wherever possible, we have sought to ensure that views of members made through independent responses are in synergy with aimm's collective views.

As our response is guided and supported by Members input, some views may be expressed that are not necessarily those of the aimm Executive or aimm's Board of Directors

Please enter your response to each of the consultation questions in the appropriate box below.

Consultation question	Your response
Do you agree with the proposal to offer ICSS which operate with a per call tariff an alternative to pricing within the alert upon connection, in the form of a free to receive SMS receipt which states the cost and the actual contact number of the organisation the consumer is seeking? If not, why not?	Confidential? No This condition gives the option of sending an SMS 'receipt' to the consumer instead of the call cost alert upon connection. However, aimm members consulted would like to again suggest that the alert option is counterproductive. As per our previous response, because the full cost of the Service Charge is billed immediately upon connection an alert at the start of the call, a verbal alert at this point will not mitigate the Service charge being applied. However, signposting the cost at the start of the call may be misleading as the consumer may believe that if they terminate the call this charge will not be made. In this instance the consumer may then hang up and will not only not experience the service which they chose to make, but will have been charged for the few seconds they have been on the line. Additionally, it is widely believed that the Access charge portion of any call cost is a complete unknown to the consumer, can make up a substantial part of the call charge, and therefore this solution cannot assist them in making a decision

on cost. It is suggested that the caller will be informed of the cost of the service “plus your phone company’s access charge” it has recently been published in an Ofcom consultation that:

“Awareness and understanding of Access Charges and Service Charges were particularly poor”*

and

“Consumers were concerned that they were unable to determine the costs of such calls. This is based on not understanding their own phone company’s Access Charges and an expectation that they could not control the length of the call”**

**4.19 Ofcom: Future of telephone numbers, First consultation*

***4.20 Ofcom: Future of telephone numbers, First consultation*

As such, this message may cause confusion to the consumer upon discovering that the service attracts one clearly stated Service charge per call but an Access charge that is applied is per minute.

(As an aside, if the cost of the call is a low pence per minute charge, the Access charge may well be multiple times higher – which is likely to lead to bill shock). If the consumer is to be told about the cost of the call, they should have enough information to enable them to make a decision. Telling the consumer a part of the price to make the call is unhelpful and in some cases could be misleading where the Access charge is higher than the Service charge (and charged per minute on a per call tariff).

One Member did suggest some alternative wording to make it absolutely clear that the charge has already been applied. For example: “Thank you for purchasing this XX service at £X:XX (plus your phone company’s access charge), we will now put you through. For reference, the direct contact number for XXXX is 0800 XXX XXX freephone / local rate”

In terms of the alternative option offered - the free to receive SMS receipt – Members firstly questioned the effectiveness of this for a fixed line caller. Whilst text based messages can be sent to landlines, there is limited knowledge of this amongst consumers, and access to these messages depends on the consumers fixed line set up.

	<p>For those who have used a mobile to call the service, Members questioned whether a text receipt would be considered acceptable under new GDPR guidelines – if consent had not been given for communication to be made in this way. Given that the consumer has used a voice service to access the ICSS in question, they would be unlikely to expect a text based response. Members ask for clarity on whether consent would need to be requested in order to send the SMS receipt. Equally Members are concerned about the intrusive nature of unwanted text communications and the negative impact that this may have on the customer. If consent is asked for, this will take further programming to what is a simple service, and even if consent is given (by the press of a button for example) if the CLI is not present, this may require MSISDN input from the customer, which they may be reluctant to provide.</p>
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If you have any supporting imagery for your responses, you can paste them in your responses in the table above or here:

Submit your response

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