

Consultation on a variation to ICSS11 for providers who operate with per call tariffs

Consultation question

Do you agree with the proposal ----- NO

PSA new proposal for use of fixed fee ICSS is I believe far too lax. As usual PSA fail to recognise that ICSS providers are tricking callers who, if fully aware of the whole cost of the call they are about to make WOULD DEFINITELY NOT MAKE THAT CALL. Note - Whole Cost of the Call.

PSA clearly know these ICSS providers are capable of identifying Mobile originated calls – therefore these same ICSS can work out the approx. 50p/minute Network Access charge and announce that to the long suffering public. £3.80 per call + 50p per minute NAC. Then when really fully informed the public can make their choice – oh but they will still have been charged by Fixed Fee ICSS. So PSA will of course allow a refund in those cases wont they!

When we consider the evidence sample provided by BT of the huge number of callers (100,000) to ICSS who terminated their calls within the first few seconds it is clear to anyone that these callers were tricked. Those callers did not in truth consume the service provided by the ICSS – to connected them to X - but then the caller realised their mistake and by terminating early they limited their costs.

When callers to Fixed Fee ICSS are looked at in this same light it is clear that those callers (BT do not specify FF volumes) who terminated early were unable to limit their charges. Fixed Fee charges kick in as soon as the ICSS answer the call and the ICSS operator does not care if callers hang up early because they have their money!

How can PSA allow these FF ICSS to continue to operate when the COP at Annex Two – Special Conditions

(n) requirements for caller agreement before a high risk service proceeds **before the caller is charged**;

BEFORE THE CALLER IS CHARGED – how can that work with a FF charge?

Referring to the COP

Outcome “That consumers of PRS are fully and clearly informed of all information likely to influence the decision to purchase, including the cost, before any purchase is made.”

2.2.1 Consumers of PRS must be fully and clearly informed of all information likely to influence the decision to purchase, including the cost, before any purchase is made.

Interesting use of the words – **all information** ---- including **the cost**. The providers of ICSS are fully aware when their callers are calling from Mobile phones. Therefore it should be very simple for them to inform such callers of the full cost of the calls including the Network Access charge from Mobile @ approx.50pence per minute. That’s the kind of information callers need and is - **likely to influence the decision to purchase**. However this still would not deal with the last part of 2.2.1 - fixed fee PRS are not able to provide a free to caller period so how can they provide this information **before any purchase is made**.

Furthermore PSA provide Fact Sheets regarding Live Services. Clearly this shows that Type 1 ICSS are Live Services.

The worry here is that the innocent Customer service rep or Tech support rep has no idea that they are party to a Live PRS service – this cannot be right.

Additionally -

Fact Sheet #3 states:-

What are the key points?

The main issues for providers to consider are:

- *Live services are defined as **those that allow for a two-way, or multi-party conversation to take place.***

- *All live services must **give the name of the provider and pricing information on connection.***

Definition of a live service 1.1.

*Live services are defined as those **that enable a consumer to speak with a real person** (i.e. a service that involves a two-way or multi-way live voice conversation). There are many different types of live service – **technical support**, counselling and professional advice services being a few examples*

Fact Sheet #2 states

*2.1. The Phone-paid Services Authority recommends that **all live services** must include introductory messages (i.e. messages that are **heard by callers on call connection**), detailing the call cost per minute and the identity of the provider that is providing the service, as a point of best practice and in support of transparency and pricing outcome at Section 2.2 of the Code.*

2.5. Where a service offers the facility of onward connection within the service, as with Directory Enquiry and International Call Routing Services, pricing information should be repeated immediately before the call is routed to its final destination

Additionally - GENERAL GUIDANCE NOTE - **The avoidance of undue delay**

What are the key points?

*Generally, **queuing is not permitted** on any type of service (exceptions are made for the use of the 'eavesdrop' facility and for 'lower-cost services', as well as for 'emergency situations' – all of which are set out in the document).*

- *'Holding' or **delaying consumers from reaching key information** is not permitted on any service.*

The way that Type 1 ICSS providers go about their business means that they rely entirely on the unwitting Customer Services they connect to, without those Customer Services being aware of the PRS element. The Type 1 ICSS is nothing without the Customer Services they connect to. Therefore I submit that Type 1 ICSS are inextricably linked to the Services they connect to and they must therefore take account of how those Live PRS calls operate. But ICSS have no control over how that connection will pan out. Will there be undue delay, a huge period on hold or perhaps a 'this call centre is closed message'? They have no knowledge and frankly do not care – they always get their money!

Perhaps as a minimum PSA should insist that ICSS calls do not charge until the Customer Service centre connection is actually answered?

Sincerely not a fan of the ICSS rip off.