

Customer Calls Limited's response to the PSA's consultation on a variation to ICSS11 for providers who operate with per call tariffs

1. Introduction

1.1. This document sets out the response of Customer Calls Limited to the PSA's consultation on a variation to ICSS11 for providers who operate with per call tariffs.

2. PSA's Proposal

2.1. On 9th October 2019 the PSA published an update to the consultation on changes to regulatory framework for ICSS, including a statement on changes to regulatory framework for ICSS and further consultation on Special Conditions.

2.2. As part of this statement the PSA confirmed that it has decided to re-consult on a variation to the original proposal for ICSS11 for providers who operate with per call tariffs as a result of evidence submitted in the previous consultation.

2.3. The proposal is that *'providers of per call tariff ICSS can either state the service charge within the alert upon connection, or send the consumer a free to receive SMS following completion of the ICSS, which would provide both a receipt for the call and also the actual number of the organisation being sought.'*

3. The proposed changes

3.1. The updated proposal for Special condition ICSS11 is as follows:

ICSS11

(a) Consumers must receive an alert at the start of the call before onward connection stating the following (in any order):

(i) the cost of the service per minute and/or per call followed by the words "plus your phone company's access charge";

(ii) that the ICSS provider is not [insert the end organisation's name] or that the ICSS provider is [insert ICSS provider name]; and

(iii) the name of the end-organisation consumers will be connected to or given the option of connecting to.

Caller agreement may be given by pressing a specified key or otherwise responding to the alert, or by remaining on the line to access the service.

(b) Where the service is charged on a per call basis as an alternative to fulfilling the requirement at paragraph (a) above the consumer may be sent a free to receive SMS in the form of a receipt upon completion of the ICSS call which states how much the call has cost followed by the words "plus your phone company's access charge", and provides the actual phone number of the organisation the consumer is seeking.

For example: "Thank you for using XXXX call connection service, you have been charged £X.XXp plus your phone company's access charge. The direct contact number for XXXX is 0800 XXX XXX freephone / local rate"

3.2. The PSA have raised this Consultation question:

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?

4. Customer Calls Limited's response to this Consultation question

4.1. Customer Calls Limited, in addition to providing clear and prominent information on our landing pages to inform consumers of our service cost prior to connection, provide a free SMS text message to consumers after connection which includes:

- The name of the organisation which the consumer was connected to
- The direct contact number for the organisation which the consumer was connected to
- The opening hours for the organisation which the consumer was connected to
- A link to the ICSS provider's T&Cs

This function successfully reduces the number of repeat calls that Customer Calls Limited receives to its service and effectively provides added value to consumers, enabling them to get in touch with the end organisation in future, should they need to, without reusing an ICSS.

4.2. Customer Calls Limited supports 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.

4.3. Customer Calls Limited believe however that the proposed wording of ICSS11 should be reviewed in relation to the PSA's suggestion that the SMS '*states how much the call has cost followed by the words "plus your phone company's access charge"*', the reasons for this are set out below:

- a) The strict regulation of ICSS ensures that consumers are fully aware of the cost of using the service prior to connection and it is futile to require an ICCS using a per call tariff to inform the consumer of the call cost **after** that cost has been incurred.
- b) Including the cost in a free to receive SMS message would generate consumer confusion and may lead them to believe that the SMS itself is chargeable and/or a subscription service or that using the number provided in the SMS message for the destination company may be charged at £6.00.
- c) SMS messages have restricted character counts, and as such we believe that the most valuable and beneficial information for the consumer is included in the SMS – that is, the name of the destination company, their direct contact number and the hours in which they can use this number.
- d) Exceeding character counts, and thus sending two or more SMS messages instead of one, does not form a seamless consumer experience and would lead to further confusion – especially if the consumer mistakenly believes that they are being charged for receiving the SMS messages.
- e) Whilst SMS messages are free to receive by the consumer, ICSS providers incur the cost of sending these SMS messages. Enforcing the content of the SMS message increases the character count of the SMS, as shown below, thus effectively doubling the cost to the ICSS provider for providing this free to receive service:

Current SMS	SMS As Per PSA's example
British Gas Homecare's number is 03332029604. Open Mon-Fri 8am-8pm, Sat 8am-8pm. T&C's bit.ly/2ZjsZBr	Thank you for using Customer Calls call connection service, you have been charged £6.00 plus your phone company's access charge. The direct contact number for British Gas Homecare is 03332029604 freephone / local rate
Total characters used = 101	Total characters used = 218
Total SMS chargeable = 1	Total SMS chargeable = 2
<ol style="list-style-type: none"> 1. Provides direct organisation name 2. Provides direct number for future use 3. Provides useful opening hours 4. Provides link to T&Cs 	<ol style="list-style-type: none"> 1. Does not provide opening hours 2. Does not provide link to T&Cs 3. May cause consumer confusion around pricing / the consumer may be lead to believe that the SMS itself costs £6 / they have been subscribed to an SMS service 4. Direct contact number charges (i.e. freephone or locate rate) cannot be distinguished by SMS service 5. Consumers would receive 2 x SMS instead of 1 6. Double costs for ICSS provider due to increased character count

4.4. Due to the very success of the SMS service implemented by Customer Calls Limited, and the noticeable reduction in repeat callers, we suggest that the following is a necessity when sending an SMS to consumers:

- a) The direct organisation's name
- b) The direct organisation's number
- c) The direct organisation's opening times

The inclusion of the cost at this stage of the consumer journey (**after** the charge has been incurred) is wholly unnecessary as the consumer is already fully aware of the cost of using the service prior to connection.

In addition to this, we believe that a requirement for the inclusion of a link to the ICSS providers terms and conditions will ensure that consumers have easy access to:

- d) The full terms and conditions of using the ICSS service, including how the service operates and the cost of using the service
- e) Information on who operates the service, including contact details for the ICSS provider should they be needed

Together, these requirements will ensure that the consumer is getting the most value possible from the SMS as well as providing them with access to more information about the PRS and the opportunity to contact the ICSS provider where necessary.

Whilst the PSA has the opportunity to revise the content of ICSS11, we believe there are important improvements that take into account the above, that should be made to the wording:

- (b) Where the service is charged on a per call basis as an alternative to fulfilling the requirement at paragraph (a) above the consumer may be sent a free to receive SMS in the form of a receipt upon completion of the ICSS call **which states the name and actual phone number of the organisation the consumer is seeking and provides a link to the ICSS provider's terms and conditions which must contain the name and the contact details of the Level 2 provider of the relevant PRS. If the contact details include a telephone number, it must be a UK number and not at premium rate.**

5. Conclusions

- 5.1. The PSA's proposal, in part, offers an acceptable alternative to ICSS providers who operate on a per call tariff. However, there is a clear risk of consumer confusion and increased operational costs for service providers due to the content dictated by the PSA for inclusion.
- 5.2. Customer Calls Limited has a very successful SMS service in place which has already demonstrated added value to consumers and effectively reduced repeat calls received to our service.
- 5.3. Customer Calls Limited urges the PSA to revise the content requirements set for ICSS providers within the SMS message option. Limited character counts mean that the most important and useful information to the consumer should be priority – that is the destination organisation's direct number, the hours in which they can use this number and a link to the ICSS providers terms and contact details.