

**From:** [REDACTED]  
**Sent on:** [REDACTED]  
**To:** PSA Consultations <consultations@psauthority.org.uk>  
**CC:** [REDACTED]  
**Subject:** ICSS11 Consultation Question Response

Good Afternoon,

Please find detailed below our response to the recent consultation question regarding ICSS.

*'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?'*

**DWP Response:**

We believe the proposed variation to ICSS11 is not a viable option and therefore do not support the proposal.

The updated proposal assumes that all callers have a mobile phone and will chose this method to call the ICSS. The following need to be considered before implementing changes to ICSS11:

- Is the assumption that the ICSS provider will send a text to the number being used to call from? How will the ICSS provider know:
  - which number to send the text to?
  - If the callers' mobile device receives text messages?
  - If the caller has their phone ID blocked?
- Where a mobile phone is used for the call, the caller is unlikely to look at any messages they receive during the call. Callers to ICSS numbers need clear, unambiguous call cost information before or at the outset of a call, enabling them to make an informed decision on whether to proceed with or terminate the call. The potential value of a text is negated by receipt of it after the call is completed.
- The text option is misleading because it will not provide the full cost of the call, only the ICSS provider element. The option of sending a text exposes the caller to more potential harm; they could be told the cost of the call is £XX, decide to continue with the call and then discover they have incurred additional service provider's costs. Most people will see a cost element and not read or understand the remaining text relating to a network supplier's costs.

- If this approach is implemented, will it give ICSS providers data that they could re-use i.e. the mobile telephone number of the caller? If so, how would that information be protected and governed by the ICSS regulations?
- The provision of a text after the call telling a user of the cost of a call totally negates the point of having the warning as it is too late to influence a decision to continue or not.

Please do not hesitate to contact me should need any additional information.

Thank you,

