

## The Telecommunications UK Fraud Forum (TUFF) Response to PSA's Re-Consultation on ICSS

TUFF is supportive of any credible initiative to reduce fraudulent, criminal or misleading activity within the telecommunications space, particularly where such activity results in consumer harm, and thanks the PSA for the opportunity to comment on their ICSS Re-Consultation.

The following points have been raised by members of the TUFF community:

- PSA declares ICSS11 as a High-Risk Service and separately defines Live Services as those that enable a consumer to speak with a real person. All ICSS services facilitate live connections between consumers and customer services within various companies and should conform to PSA's Conditions for Live Services
- If PSA imposed a limit on ICSS that use per-call charges in excess of £1.50 it would remove those services from the High-Risk category
- There is a concern that, whilst operators must inform customers calls may be recorded, there is no reciprocal arrangement for a signposting service. This appears to be a grey area in need of resolution to establish a level playing field between operators and signposting services
- Where issues arise from misinterpretation of the code, it should be incumbent on PSA to ensure that these issues are resolved, and clear advice given to guarantee they do not re-occur
- In order to avoid consumer harm, ICSS providers should supply an accurate description of the nature of the service and cost of the call per minute and/or per call
- ICSS providers should be compelled to offer the consumer an option to end the call, without being charged, after delivery of an unambiguous pricing message, or, conversely by requiring the consumer to carry out an action to continue the call (press 1 to continue, for example) – again, after delivery of a clear pricing message
- It is clear from calling patterns that many customers hang up once they hear the price of the ICSS call. This means that they have already absorbed the cost and got nothing for it. Research suggests that somewhere in the region of 50% of all calls to ICSS ranges fall into this category, which means that a great many people (>100k, a single TUFF member reports) are being charged for something they have not used. ICSS providers should be compelled to offer the consumer an option to end the call, without being charged or, by requiring the consumer to carry out an action to continue the call
- The average cost of an ICSS call for our consumers is >£6.00, irrespective of type of pricing. It is difficult to understand how a call to a number that is already available as a free service, or geographical alternative, can be allowed to attract such high charges. Again, ICSS providers need to come up with a means of giving consumers the ability to opt out without being charged

Signposting is a multi-million-pound industry and, no matter which way it is viewed, it causes consumer harm. Within the terms of the Special Conditions, it affects vulnerable groups (elements of Special Conditions Points 6 & 7 refer)

It is clear from the soundings that TUFF has taken amongst its members there is widespread concern that the provision and operation of ICSS are not being policed to the level of other telecommunications services. There are currently too many loopholes in the code that enable ICSS providers to circumvent the code and, in so doing, to cause consumer harm. TUFF is happy to work with the PSA in trying to identify and close the gaps to ensure that ICSS can operate within a robust regulatory framework.



TUFF

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