

Consultation response form

Consultation on changes to regulatory framework for Information, Connection and Signposting Services (ICSS)

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	██████████
Representing	Organisation
Organisation name	██████████
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](https://psauthority.org.uk/privacy-policy) at psauthority.org.uk/privacy-policy.

<p>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential?</p>	<p>Delete as appropriate: your name/organisation name</p>
<p>Your response: Please indicate how much of your response you want to keep confidential.</p>	<p>Delete as appropriate: None</p>
<p>For confidential responses, can the PSA refer to the contents of your response in any statement or other publication? Your identity will remain confidential.</p>	<p>No, except where permission to use the contents for a specific statement or publication has been requested of, and accepted by, [REDACTED] (with the exception of this consultation).</p>

Your response

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

Consultation questions	Your response
<p>Q1. Do you agree with revised wording of ICSS1 as being outcome based and inclusion of the reference to the appearance of organic search engine results including map-based results? If not, why not? Please provide evidence to support your reasons.</p>	<p>Confidential? No</p> <p>No, we do not agree with the revised wording, the examples given are too long and restrictive.</p> <p>Presuming that PSA will expect this information to be provided in the headline text where each of the lines is restricted to 30 characters the proposed wording is not viable; for example, in our case for type1 it would amount to 51 characters at its shortest.</p> <p>Forcing the inclusion of a specific company name is overly onerous and unfair on companies with longer company names.</p> <p>The wording does not allow enough space for a clear description of the service destination in the headline</p>

	<p>We suggest, if any change is to be made at all, that the below example phrases would be better than the ones suggested, which both fit into H2, leaving H1 to describe the destination of the ICSS</p> <ul style="list-style-type: none"> • for type1 "third party connection service" • for type2 "third party assistance service" <p>Note that should PSA be content with this information being provided in the longer “description” area of the ad, where there are more characters allowed, the suggested wording may be feasible technically but would still be overly onerous in comparison to other prs regulation, and the company in any event should be allowed to use the term “third party” or similar in place of their own company name should they wish.</p> <p>Regarding the requirement to <i>“not use any language or marketing techniques which may mislead the consumer into believing that the service is the helpline or information service of the organisation the consumer is seeking”</i> further guidance is needed as to what type of wording or marketing techniques would be considered compliant or misleading, with examples. The descriptive wording for a call connection service is by nature similar to that of a company’s own helpline, and this causes potential for confusion in establishing compliance.</p>
<p>Q2. Do you agree with the proposed amended wording of ICSS2? If not, why not? Please provide evidence which supports your reasoning.</p>	<p>Confidential? No</p> <p>No, we do not agree. Internet marketing is not an exact science and the role of the advert is not just to promote a service but also to provide clarification on the nature of that service. For example should a company search for “xxx company contact number” it is possible that in the search results page they will see, paid for and non-paid for, results that do not relate to the company they wish to contact, taking away the ability to distinguish between these results would be detrimental to all parties.</p> <p>To further clarify the above, in some cases the url path is the only place within the ad that can contain the name of the company to which the ICSS service connects. Removing the ability to have the destination company name in the path would only serve to reduce the clarity of the search results and result in a potential waste of time and money for the consumer and the ICSS provider.</p>

	<p>We disagree with the impact assessment that this would result in “consumers being better informed.”, in many cases they would actually be less well informed.</p> <p>Note that we do agree that the domain itself need not contain the name of the organisation, but the organisation name needs to be allowed to be present within the path or subdomain for the very purpose of providing clarity.</p>
<p>Q3. Do you agree with the proposal to require the specific information listed in ICSS3 to be above the call to action? If not, why not? Please provide any evidence you might have which supports your answer.</p>	<p>Confidential? No</p> <p>We disagree. This information is already present below the call to action, while relocating it to be above the call to action doesn’t seem to pose any technical issues neither do we agree that its position must be mandated so long as it is prominent and proximate.</p>
<p>Q4. Do you agree with the proposal to combine ICSS4 and ICSS5 as both conditions are relevant to the same issue and potential for harm?</p>	<p>Confidential? No</p> <p>We agree.</p>
<p>Q5. Do you agree that the amended condition should prohibit the use of official logos and marks, as well as imitative logos, marks and other promotional aspects?</p>	<p>Confidential? No</p> <p>We agree that there should be no reason for an ICSS promotion to carry any logo (apart from its own), however in the past we have found compliance advice on best practice regarding typeface and colours to be overly onerous, ICSS promotional should not be expected to avoid the use of “default” colour schemes just because they are similar to the schemes used by a company.</p> <p>For example, black/blue/grey colour schemes are very dominant, and we would not expect that ICSS should have to avoid using these colours just because other companies do.</p>
<p>Q6. Do you agree that the pricing information requirement in this</p>	<p>Confidential? No</p> <p>No, we do not agree.</p>

<p>condition should cover those ICSS which have per call tariffs? Do you also agree with the clarification as to the cost and opportunity to refuse being given before a charge is incurred? If not, why not?</p>	<p>Per call tariffs pricing information should be in the same format as per minute tariffs, however, we do not agree that the pricing information should be given free of charge for per call or per minute tariffs, it is already provided in written form on the promotional material and the maximum possible charge for a per call service is already extremely limited by tariff. We are also not sure that this is technically possible on current systems/infrastructure.</p> <p>The condition and the question are also unclear. For example, does ICSS7 only apply to ICSS that provide the caller with the number and not to those that do not?</p> <p>Does PSA expect that ICSS providers will implement a two-stage charging mechanism, in the first part charging for connection and provision of the number, and then in second part offering a further chargeable option for being connected to this number? We do not believe that this is the way that ICSS currently operate, this would seem to be more applicable to the operation of a traditional DQ service</p>
<p>Q7. Do you agree with the proposal to retain ICSS8, ICSS9 and ICSS10 and the amendments made to ensure consistency with the GDPR and DPA 2018? If no, please provide reasons to support your answer.</p>	<p>Confidential? No</p> <p>No comment, we do not provide such services and therefore do not feel that any comment would be useful or appropriate as we have little insight.</p>
<p>Q8. Do you agree that alerts at the start of an ICSS call should clearly state the cost of using the service regardless of the call tariff type? If not, why not?</p>	<p>Confidential? No</p> <p>We agree.</p>
<p>Q9. Do you agree with the assessment of current condition ICSS12 and the proposal to remove</p>	<p>Confidential? No</p> <p>No comment.</p>

<p>it? If not, please provide reasons to support your answer.</p>	
<p>Q10. Do you agree with the modification of this condition and the requirement to register all web domains on the PSA Service checker? If not, why not.</p>	<p>Confidential? No</p> <p>We do not feel that we can agree to this, or even provide an opinion, without having seen and tested the proposed new system.</p> <p>The web domain/s on which a number is promoted may be many, and often change, if there is a requirement that web domains be included the system must make it an easy process to add and update them.</p> <p>Timing is also a consideration. It is possible that a user may be searching for a number that he used yesterday or in relation to a call made 3 months ago, over time a number may have been promoted across multiple domains, some of which may no longer be active or still be in the control of the ICSS provider. It will not be possible to assure that the web address given, and the content on it, is the one that the consumer actually visited.</p>
<p>Q11. Do you agree that the proposed additional condition (the new ICSS5), will help to prevent consumers from calling ICSS when they do not intend to? If no, please provide evidence to support your answer.</p>	<p>Confidential? No</p> <p>No, we do not agree. This requirement is excessive, overly controlling and restrictive of a company's right to freely design and promote their services within a regulated environment. We also do not agree that the results of the research, if true, in any way indicate that this would be applicable only to ICSS services. Any consultation on this should be in relation to prs as a whole, and not whether it should be an ICSS special condition.</p>
<p>Q12. Do you agree with the proposal to apply the proposed Special conditions to all ICSS regardless of the number range they operate on? If not, why not.</p>	<p>Confidential? No</p> <p>We agree.</p>

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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