

# 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](mailto: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	Self
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.

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### 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 at [psauthority.org.uk/privacy-policy](https://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.</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>Yes</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>No The provider should be required to mention the words Premium Rate “premium rate connection service operated by XXX Ltd” This will be more likely to alert users who do not realise what using an ICSS fully entails. PSA often do this – propose a good change to rules and then water it down!</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>Yes</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>Yes  However this subsection appears to give the provider a loophole  <i>include a link to the homepage of the official website of the organisation that contains the contact number the consumer is looking for <b>where such a website exists</b>.</i>  The provider may say no such website could be found. I say the provider would then need to show how they discovered the number that they call forward to. Furthermore – why not make the ICSS actually show on screen the number they are call forwarding to. This would be the ultimate in transparency!</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>Yes</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>Yes</p>
<p>Q6. Do you agree that the pricing information requirement in this condition should cover those ICSS which have per call tariffs? Do you also agree with the clarification as to the cost and <b>opportunity to refuse being given before a charge is incurred</b>? If not, why not?</p>	<p>Yes  However – <u>how is this going to work</u> (highlighted yellow) with single drop charged calls? Once the call is answered by the provider it's too late the full charge applies.</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</p>	<p>Yes</p>

<p>2018? If no, please provide reasons to support your answer.</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>Yes</p> <p>However – how is this going to work (highlighted yellow) with single drop charged calls? Once the call is answered by the provider it's too late the full charge applies.</p> <p>Also (highlighted in green) when drop charges are used for ICSS surely this should also say the access charge is PER MINUTE.</p> <p>Furthermore – as many ICSS have a special web page for Mobiles in those promotions they know the call will be made from a mobile so they should additionally say that your mobile phone network's access charge will be approximately 50p/minute.</p> <p>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 including the statement "plus your phone company's access charge";</p>
<p>Q9. Do you agree with the assessment of current condition ICSS12 and the proposal to remove it? If not, please provide reasons to support your answer.</p>	<p>Yes</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>Yes</p> <p>Additionally ICSS should also be required to register the telephone number that they will call forward to in order to connect to the organisation.</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</p>	<p>Yes</p> <p>How can it be right that a customer call centre agent might answer a call from an ICSS 09 PRS. That agent has no clue that the call they are dealing with</p>

<p>to? If no, please provide evidence to support your answer.</p>	<p>is being billed at maybe £3.60 per call + 50p/minute network access charge. That agent probably believes the caller dialled an 0800 number and therefore they are not rushing to deal with this customer service query – in what regulatory World is this correct?</p> <p>Additionally – to avoid any confusion in relation to services with <u>per call charging</u> i.e. Single drop – and to meet this requirement - <b>accurate description of the true nature of the service, cost of the call per minute and/or per call,</b></p> <p>The provider must explain that network access charges are PER MINUTE. Where they promotion is specifically aimed at mobiles then they service should state that Mobile networks charge approximately 50p/minute for network access charge.</p> <p>Additionally ICSS should have to mention that the organisation they will connect the caller to will have no clue that the caller is paying a premium for the call.</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>Yes</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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