

# 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         | ██████████           |
| 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](https://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 at [psauthority.org.uk/privacy-policy](https://psauthority.org.uk/privacy-policy).

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| <p>Your details:<br/> <b>We will keep your contact number and email address confidential. Is there anything else you want to keep confidential?</b></p>              | <p>Delete as appropriate:<br/>         your name, organisation name</p> |
| <p>Your response:<br/>         Please indicate how much of your response you want to keep confidential.</p>  | <p>Delete as appropriate:<br/>         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>My response is not confidential.</p>                                 |

### Your response

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

| Consultation questions  | Your response   |
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| <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> <ul style="list-style-type: none"> <li>- We do not agree to this rule. You cannot decide how the organic search results will look or how the title of the search result will look in the description. Google bot is decides this automatically - and even changes the organic search results title and description dynamically according to every specific search query. We have tried to make different attempts to change the organic search results titles and descriptions, but the Google algorithm chooses the title and description for the search results according to whatever is written on the page, and whatever is the most relevant to the search query. In other words - Google pulls the information from the website landing page</li> </ul> |

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|   | <p>and the webmaster has no real control over what information will be presented</p> <p><b>Google also state this in their guidelines:</b><br/> <a href="https://support.google.com/webmasters/answer/35624?hl=en">https://support.google.com/webmasters/answer/35624?hl=en</a></p> <p><i>“However, sometimes even pages with well-formulated, concise, descriptive titles will end up with different titles in our search results to better indicate their relevance to the query. There’s a simple reason for this: the title tag as specified by a webmaster is limited to being static, fixed regardless of the query.”</i></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 (delete as appropriate)</p> <ul style="list-style-type: none"> <li>- There should be clear instructions about what is specifically considered as misleading and what is not. For example: Website domain name “skycustomerservice.co.uk - can be misleading,. On the other end, the website name “ukservicenumbers.co.uk/sky - is not misleading and I believe that call connection operators should feel free to buy and operate these kind of domain names without the fear of doing something wrong or misleading their customers. I think that there should be a clear notice on the website explaining to the customer that the website is not associated with the organisation they are seeking. A better rule would be not to include any company name in the website name (domain name), but it's perfectly fine to add the company name on the slug (A 'slug' is the part that comes at the very end of a URL, and refers to a specific page or post).</li> </ul> |
| <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 (delete as appropriate)</p> <ul style="list-style-type: none"> <li>- I agree with this rule</li> </ul>   |
| <p>Q4. Do you agree with the proposal to combine ICSS4 and ICSS5 as both</p>  | <p>Confidential? No (delete as appropriate)</p> <ul style="list-style-type: none"> <li>- I agree with this rule</li> </ul>   |

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| <p>conditions are relevant to the same issue and potential for harm?</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 (delete as appropriate)</p> <ul style="list-style-type: none"> <li>- I do agree that there should not be anything that makes the promoted page appear like the actual company website. Having said that, there are plenty of call connection pages online that have screen shots with marks, arrows and highlighting the numbers and email addresses from the original company website. I do believe that this kind of promotional material should be allowed. The surfers on the call connection related websites will surely understand that those pictures and screenshots with highlights, marks and arrows from the original company website are not related to the promoted call connection page.</li> </ul> <p>-</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 opportunity to refuse being given before a charge is incurred? If not, why not?</p> | <p>Confidential? No (delete as appropriate)</p> <p>I agree.</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 (delete as appropriate)</p> <p>I agree.</p>  |
| <p>Q8. Do you agree that alerts at the start of an ICSS call should clearly state the cost of using the service</p>   | <p>Confidential? Yes (delete as appropriate)</p> <p>I agree.</p>  |

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| <p>regardless of the call tariff type? If not, why not?</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>Confidential? Yes (delete as appropriate)</p> <p>I agree.</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/ Yes/No (delete as appropriate)</p> <p>I agree.</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? Yes (delete as appropriate)</p> <p>I agree</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? Yes (delete as appropriate)</p> <p>I 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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