

# 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
Organisation name	Invosys Ltd
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).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential?	Nothing
Your response: Please indicate how much of your response you want to keep confidential.	None
For confidential responses, can the PSA refer to the contents of your response in any statement or other publication? Your identity will remain confidential.	Yes


### Your response

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

Consultation questions	Your response
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	Agree

reasons.	
<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>I agree with domain and sub domain but the whole path is not necessary. The aim of all this is so that consumers know exactly who they are calling which I think would be made less clear by doing this.</p> <p>Also, the consultation says that people felt misled by the URL but the university study actually found "Most consumers did not look at the url of the website, despite this often being a useful indication of whether the number is provided by the company that the consumer is seeking to contact or is provided by a third party."</p> <p>Not that I think much of this research as I would have expected a sample size greater than 20 people.</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>I don't have a problem with it but I think the main issue is that there are a lot of ICSS providers who are still not compliant and they should be targeted.</p> <p>As it stands, I have seen a lot of sites that do not comply and the PSA has not done anything about yet so it's questionable whether this will actually do anything.</p> <p>I think the current rule is sufficient enough as it should be seen by the consumer and if it is missed then they will be given the same advice on the IVR.</p> <p>I'm not keen on making changes based on 1 study and only 20 people</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>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</p>	<p>Agree</p>

<p>promotional aspects?</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>I agree but I'm not sure if it is possible to start the charge after the call has started. All the providers that I've spoken to can't do it. If you have a way it can be done, please let me know.</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>Agree and surprised it wasn't already</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>Agree</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>Agree</p>
<p>Q10. Do you agree with the modification of this condition and the requirement to register all web</p>	<p>Agree</p>

<p>domains on the PSA Service checker? If not, why not.</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>I don't agree. This is based off the eye tracking study which I think has been interpreted incorrectly.</p> <p>The experiment shows that people will look at logo's not that they go to the top left. Logos are usually at the top left corner.</p> <p>The eye tracking study supports my interpretation rather than the PSA's with the screenshot they used. You can clearly see that people were looking at the 2 logos.</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>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**

To send your responses to the PSA please email this completed form to [consultations@psaauthority.org.uk](mailto:consultations@psaauthority.org.uk) or by post to Sarah-Louise Prouse, Phone-paid Services Authority, 40 Bank Street, London, E14 5NR.

