

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	Mi Telecom
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 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>	Nothing).
<p>Your response: Please indicate how much of your response you want to keep confidential.</p>	None
<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>	Yes

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</p> <ul style="list-style-type: none"> • If the revised wording make reference to language or marketing techniques, then this requires clarification as to what is meant by this? • The inclusion of the company name operating the service will further reduce the available characters within the SEM and is repetition when this information already has to made available on both the landing page and on the IVR. At the point that a customer chooses to click a link there has been no consumer harm and it has not cost the consumer anything, whereas the service operator has incurred any advertising cost. Therefore it is in the service operators best interests to accurately market their services and avoid unnecessary advertising costs.

<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>No</p> <ul style="list-style-type: none"> The use of domain name and sub domain is a standard way of building and segmenting web-sites in order that individual pages/services can be found and identified. I don't believe that URL's mislead a consumer, but are instead used as a signpost and confirmation that it is the service they are looking for. It is a bit like a shop removing their sign. If they remove their sign then a consumer would have no idea if they sell what they are looking for and wouldn't enter, whereas if there was a sign the consumer could enter the shop and make a decision if they would like to purchase the item they are looking for. The current ICSS regulations ensure that he customer can make an informed purchasing decision once that reach a landing page or use the service, so I don't believe we should have to remove all the signposts to the service.
<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>No</p> <ul style="list-style-type: none"> All of the evidence seems to focus on the fact that the current condition is not being adhered to. All of my customer have always ensured that this information is clear and prominent, so I'm unsure why it being suggested to move this information about the above the premium rate number when the simple solution would be for the PSA to ensure that the current condition is adhered to.
<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</p>	<p>No</p> <ul style="list-style-type: none"> I don't believe it is for the PSA to prohibit the use of official logos as this is why the

imitative logos, marks and other promotional aspects?	trademark process exists. As with domain names, logos are just another visual signpost as long as the rest of the PSA conditions are being adhered too.
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?	No <ul style="list-style-type: none"> It is impossible for network operators to provide consumers the ability to hang up a per call tariffs before incurring any charge. BT's RIDE platform is the only platform that can provide the service. However, there is a restriction on the RIDE message length prior to connection which means all the current and ICSS conditions could not be satisfied.
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.	Yes
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?	Yes
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.	Yes
Q10. Do you agree with the modification of this condition and the	Yes

<p>requirement to register all web 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>No</p> <ul style="list-style-type: none"> • There always appears to be an assumption that consumers don't want to use ICSS services, whereas nobody seems to consider that consumers are choosing are the interact with them. If a customer is choosing to interact with an ICSS service but at every step of the process (SEM, Landing Page, IVR) is being warned or gets no confirmation that this is the service they are looking for then they could be discouraged from using the service...and discouraged should not be confused with protecting. Discouraging a consumer from using a particular service also does not ensure that they will have ultimately have a positive experience with another service. <p>As long as the call to action is not in the top left of the screen then both the call to action and pricing information should carry equal weight and the consumer can make an informed decision.</p> <p>No other PSA regulated services are also subject to this level of regulation, unless the PSA is going to propose that all PRS pricing is placed in the top left hand corners of web pages.</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>No</p> <ul style="list-style-type: none"> • Simply because a market has amassed extremely large revenues at a higher tariff does not mean that there is a requirement for greater consumer protection across all tariffs. ICSS services are already well regulated compared to the majority of the PSA's other regulated services and with the proposed additional regulations and move to regulate a service rather the numbers ranges they operate on it feels like the PSA is attempting to throttle a service rather than regulate and promote it.

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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