

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	[REDACTED]
Contact phone number	[REDACTED]
Representing	<i>Organisation</i>
Organisation name	<i>Netcollex Ltd</i>
Email address	[REDACTED]

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.

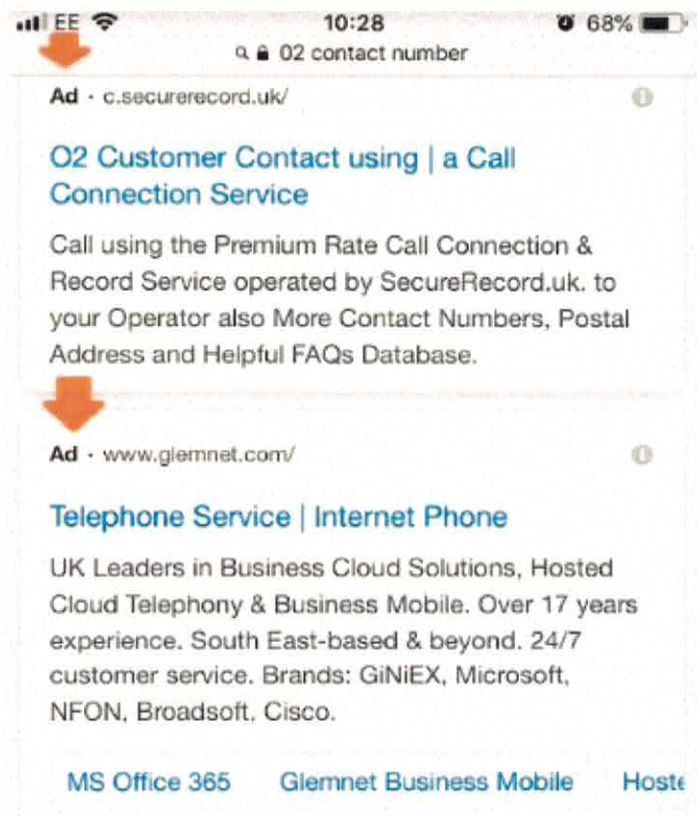
<p>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential?</p>	<p>Delete as appropriate: Nothing</p>
<p>Your response: Please indicate how much of your response you want to keep confidential.</p>	<p>Delete as appropriate: None</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</p>

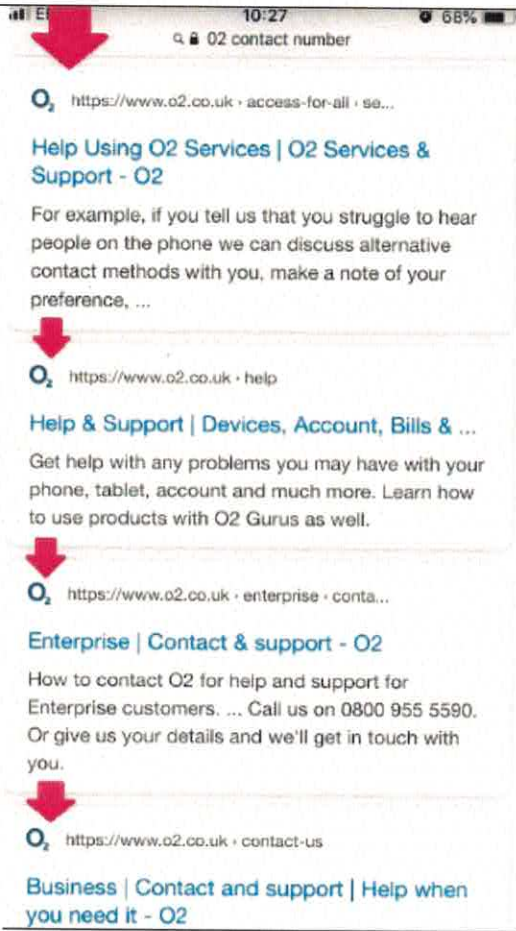
Your response

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><i>Netcollex fully understand that a consumer should not be misled in to believing that they are clicking on an advert that they believe is that of the company they are seeking. We also agree that an advert should be clear to the consumer and that a marketed description of the service stated by an ICSS provider is concise and not misrepresent the service being offered.</i></p> <p><i>However, we do not agree that the advert should contain the full Service Provider's company name. Depending on the character length of a company name this could use up limited character space allowed by search engine advertising platforms. The Service Providers name is shown on the landing page, and is audibly announced before onward call connection and can be usually be found multiple times throughout an ICSS website. Good practice Service Providers also link to a 'contact us' page where again their full company name is stated.</i></p> <p><i>The requirement of a Service Provider at this stage is very restricting towards the creativity of their advertising and is not required by any other PRS service in the market.</i></p>

Google Ads (mobile phone adverts) have recently changed. They now show the logo of a company in the top left hand side of a natural search result listing. Where an advert is a 'paid for' advert, the logo box clearly shows the term 'Ad' instead of a company's logo. This, along with the URL of said company being clearly shown, should help the consumer when choosing which listing to select for further assistance as this helps to define the branded company from the ICSS company.



	
<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>It would be bad practice for a service provider to use a URL which is a blatant replica of the company a consumer is looking for. We do not see the harm of the company name being part of the path. This is common practice across many non ICSS advertisers.</p> <p>Examples of which are:</p> <p>https://www.comparethemarket.com/broadband/providers/sky/</p> <p>https://www.moneysupermarket.com/car-insurance/providers/admiral/</p> <p>https://www.bbc.co.uk/news/topics/cdl8n2ededdt/santander-group</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>Netcollex disagree with the proposed ICSS3.</p> <p><i>The consumer has the opportunity prior to clicking on an ICSS advert to find a free/low cost link to the actual company being sought. We believe that the current condition of the inclusion of a free/low cost link is sufficient for the consumer.</i></p> <p><i>With the possibility of more information displayed prior to a PRS number it could lead to the consumer scrolling past this information and other important price warning information in their haste to call the company they want to connect to.</i></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>Netcollex have no objection to the combining of ICSS4 and ICSS5.</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>Netcollex agree mostly with the amended condition.</p> <p><i>Use of logos should not be used by an ICSS</i></p> <p><i>An ICSS provider may use one colour palette across their website regardless of the call connected company that are promoting. It is inevitable that there could be unintentional and vague colour similarity between ICSS provider and end company.</i></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>Netcollex do not see this as being feasible under the current telecommunications environments.</p> <p><i>Technically in the UK, any particular call is likely to undergo multiple protocol conversions to reach its destination. This on its own makes the calling environment or transmission path nearly impossible to guarantee. Without this, any attempt at interfering with the signalling and send a message back to the caller will prove impossible.</i></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>Netcollex have no objection to the retaining ICSS8, ICSS9 and ICSS10.</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>Netcollex 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>Confidential? No</p> <p>Netcollex agree to the removal of ICSS12</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>Netcollex do not see any issues declaring on the PSA Service Checker that the service being provided is an ICSS Service, the name of the company that the service is connecting to or the web domain being promoted.</p> <p>Depending on the volume of companies an ICSS is promoting could be a time-consuming project due to lack of a bulk upload facility being provided by the PSA. A review of the current practice of numerous emails per number submission or post editing should also be considered by the PSA.</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>Netcollex do not agree.</p> <p>This is an unreasonable condition. We feel that as long as the required information is in close proximity to the ICSS telephone number that a service provider should be allowed to design their website more freely to ensure that they are different from their competitors.</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><i>Netcollex agree with the proposal of Special Conditions applied against all number ranges regardless of tariff however we feel that this could encourage ICSS providers to swap to higher tariffs for their ICSS promotions.</i></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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