

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	Numbers Plus 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.

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>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>Confidential? No</p> <p>This change is not wholly fair for any service that benefits from SEO. With paid-for marketing the Service Provider has control over the wording and the nature of the display ad and it is fair to request that this advertising is not misleading and contains certain text, however SEO is less easy to control as the Search Engine selects text from the website as it sees relevant and may not select the required wording. The website could be fully compliant but the display in any natural listing is dependent on ever-changing search engine algorithms. The Service Provider can make every effort to have a compliant natural listing result but ultimately, they can only have a certain level of influence.</p>
<p>Q2. Do you agree with the</p>	<p>Confidential? No</p>

<p>proposed amended wording of ICSS2? If not, why not? Please provide evidence which supports your reasoning.</p>	<p>This amendment would prove difficult to comply with for many providers. The URL extensions provide references to the visited pages and can be a clear indicator for the service user and helpful should they wish to store the page link. For example your own link for this research https://psauthority.org.uk/research-and-consultations/consultations/2019/april/consultation-on-changes-to-regulatory-framework-for-icss We agree that the domain name should not be misleading and as most search engines will display the domain in bold type, it should be clear to the user which site they are on.</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 All compliant ICSS services will already have a prominent link to the homepage of the company. Setting the link above the number could require some web development time and costs for many, if the site needs to be rebuilt to accommodate, but we agree in principal with the change.</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 Yes, we 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 promotional aspects?</p>	<p>Confidential? No Yes, we agree</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</p>	<p>Confidential? No In principal the amendment is fine, however in practice there is an issue. Our platform and many other providers will charge a caller on connection. Once the caller has heard the price warning they have already been charged. The advertising must make it clear (as is standard with all premium services)</p>

<p>refuse being given before a charge is incurred? If not, why not?</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 Yes, we 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 regardless of the call tariff type? If not, why not?</p>	<p>Confidential? No Yes, we agree It is a shame that the high access charges by mobile operators are not levied on a per call basis to make the "per call" charging method fairer. The per minute access charge makes a mockery of fixed cost call tariffs.</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 Yes, we 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? No Yes, we 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</p>	<p>Confidential? No Yes, we agree</p>

<p>provide evidence to support your answer.</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>As you may gather from our answer to question 8 we believe that it is access charges that cause the most consumer harm and should be reviewed.</p> <p>There would be no need to regulate low cost services if the access charges were set at a sensible level relative to the tariff.</p> <p>It is clear that a 10 minute call that cost 70p or £1.30 would be unlikely to attract a complaint. It would be a fair charge for a service; but when a £5.50 access charge is added, then it is a different matter. In spite of Ofcom's best intentions of making the service charge and access charge clear to callers, they will associate all of the cost with the Service Provider and could request a refund in full when only a small part of the charge is the service charge.</p> <p>In their latest consultation Ofcom are reviewing the future of 084 and 087 numbers as they have become less popular over the last few years. This is hardly surprising when their own changes to the billing mechanism have made these low cost ranges so expensive to call.</p> <p>03 numbers should certainly not come under PSA regulation. They are low cost number (or free with inclusive minute packages). If an 03 number is being used for fraudulent purposes the that would be a matter for police investigation.</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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