

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	Sim Interaction Ltd
Organisation name	As above
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

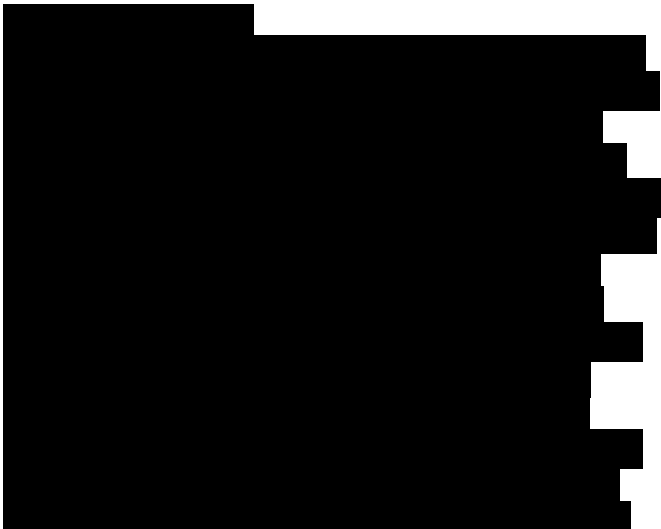
We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how the PSA handles your personal information and your corresponding rights, please see our Privacy policy at psauthority.org.uk/privacy-policy.


<p>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential?</p>	
<p>Your response: Please indicate how much of your response you want to keep confidential.</p>	<p>Delete as appropriate: Part of the response we wish to remain confidential this being question 6</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? Yes/No (delete as appropriate)</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 We acknowledge that the full URL should be shown and should not mislead the customer into believing that the website is associated with the organisation. However, we do not believe that having the name of the organisation in the URL title itself misleads the customer. It is merely a means of identification, so long as it is apparent that the URL identifies the service</p>

	<p>provider to be separate from the organisation that is being advertised.</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 (delete as appropriate) We acknowledge the proposed changes to ICSS3 in relation to the positioning of the statement above the premium rate number and inclusion of a link to the official website of the organisation on the landing page. However we seek clarification if these changes relate only to the landing page or must also be included in the advert that promotes the service on the search engine, as there is a limit to the number of characters available within an advert or organic listing. The clarification is sought as the wording 'All promotional material' in the suggested amended condition is too wide and could potentially include the advert and organic listing. We would oppose the inclusion of this wording other than on the landing page.</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? Yes/No (delete as appropriate)</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? Yes/No (delete as appropriate)</p>
<p>Q6. Do you agree that the pricing information requirement in this condition should cover those ICSS which have dropped charge 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>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? Yes/No (delete as appropriate)</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? Yes/No</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/No (delete as appropriate)</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>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</p>	<p>Confidential? Yes/No (delete as appropriate)</p>

to? If no, please provide evidence to support your answer.	
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.	Confidential? Yes/No (delete as appropriate)

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@psauthority.org.uk or by post to Sarah-Louise Prouse, Phone-paid Services Authority, 40 Bank Street, London, E14 5NR.