

From: [REDACTED]
Sent on: Monday, July 5, 2021 4:08:01 PM
To: PSA Consultations <consultations@psaauthority.org.uk>
Subject: Code 15 Consultation

Hi there folks,

Following the solicitation for comments to Code 15, [REDACTED] only has a few specific comments/observations. It seemed pointless to fill out the full questionnaire, so we have pinpointed the main pinch points for us and hope this will suffice as our responses:

Q3 Do you agree with our proposed regulatory approach relating to Guidance? Please provide an explanation as to why you agree or disagree.

This is difficult to comment upon, bearing in mind no Guidance has yet been issued. We feel that Guidance should have been provided to support the Code at this stage, to allow full evaluation. Without the support of Guidance it is difficult to fully endorse the new Standards.

Q6 Do you agree with our proposed regulatory approach relating to Best Practice information? Please provide an explanation as to why you agree or disagree.

As above. We haven't seen any Best Practice information in order to make any evaluation. Without the support of Best Practice it is difficult to fully endorse the new Standards. We are also unsure whether Best Practice trumps Guidance or vice versa (or neither).

Q15 Do you agree with our proposal to introduce a new Transparency Standard? Please provide an explanation as to why you agree or disagree?

[REDACTED] operates one-in-one-out controlled premium rate services for both voice (09) and mobile (SMS) routes. As part of the billing response mechanism we already operate a form of 'receipt' for all SMS entries, albeit not one that is not quite as fulsome as that proposed by the PSA. We have never, ever had any complaints about this mechanism being opaque or unclear from any viewer previously. Should we have to incorporate all the details outlined by the PSA we may have to send multiple messages to the viewer, which would incur additional costs [REDACTED] (at 2/3p per message). So while we 100% fully support the need for transparency, we believe our existing system is clear enough, and any additional requirements may incur additional costs to us, that would undoubtedly eat into the bottom line.

Q17 Do you agree with our proposal to introduce a new Fairness Standard? Please provide an explanation as to why you agree or disagree.

[REDACTED] welcomes the statement by the PSA that:

To be clear, we are not proposing at this stage to apply MFA Requirements for voice-based services or single transaction services that are accessed via PSMS

It is not unreasonable to suggest that multi-factor authentication would be incredibly problematic for the broadcast sector and would severely inhibit [REDACTED] ability to operate effectively as a commercial entity in this space. The friction potentially caused to the viewer who wishes to interact within a real-time and 'active' broadcast environment would put many people off making multiple (free choice) entries. With this we appreciate the decision for the PSA not to apply MFA Requirements for single transaction services that are accessed via PSMS at this stage.

██████ supports the PSA in all areas and will work towards all aspects of the new Standards approach while continuing to operate to the highest levels of integrity of compliance in its space. We appreciate, however, the PSA taking into consideration our concerns in specific areas and hope that we can reach a workable and meaningful full Code 15, along with supporting (and supportive) Guidance/Best Practice in due course.