



BT Group plc  
1 Braham Street,  
London E1 8EE,  
United Kingdom

[bt.com](https://www.bt.com)

25 January 2023

Dear Peter,

**BT response to the PSA Consultation on Business Plan and Budget 2023/24**

Thank you for inviting comments to the PSA Consultation on its business plan and budget 2023/24.

Overall, we support the PSA's priorities and business plans for 2023/24. However there are a few areas we seek further clarification on.

**Business Plan**

- There is no mention in the Business Plan about the weekly and monthly PSA reporting. We find this reporting really useful for benchmarking internally and are keen that it continues, can the PSA please confirm this will continue both weekly and monthly? It would also be useful to have information in the reporting about service numbers dialled and the nature or categories of any complaints so we can identify any trends.
- We'd like to see more proactive campaigns from the PSA. For example:
  - To improve customer awareness of mobile payments as a payment mechanism. Often, customers are not aware that they can pay on their mobile bill and assume it is fraudulent, we'd like to see the PSA campaign to raise awareness and prevent customer confusion.
  - To inform industry of the importance of reviewing their service portfolio and entries on the PSA portal.
- We'd also suggest that the business plan includes improvements to the PSA registration system – at the moment, it is difficult to search when there is a complex value chain e.g more than three parties involved in the chain. Sometimes the service may be registered twice, once by the provider and once by the intermediary, this could cause confusion for customers when they are trying to understand their bill.

- Can the PSA consider if there is scope for providers to be involved in the Annual Market Review process, for example the brief provided to Analysis Mason. The AMR is really interesting but in particular we'd like to see the scope of this report extended to get some insight into what customers want and expect from mobile payments, which could help the industry develop the right propositions for consumers. For example, market research on what services customers would be willing to pay for on their mobile bill beyond digital goods.

### **Levy and Operational Budget**

We have noted that the reconciliation process for the levy takes place after the estimated invoices are issued, can the PSA consider whether the reconciliation process can take place beforehand to ensure the correct levy amount is issued.

### **Transfer over to Ofcom**

We understand that there will be a separate consultation on the PSA transfer into Ofcom. We welcome the confirmation that the PSA will ensure there is no over recovery of the budget and the consultation notes that if the transfer to Ofcom goes into 2024, there will be no over recovery from industry, but if there is for example £500k left in the bank, can PSA confirm where the remaining amount will go? Can the PSA also clarify how the levy will be calculated to ensure industry is not duplicating payments?

Should you wish to discuss our response further, please do not hesitate to get in touch.

Your sincerely,  
Francesca Safi