Response to PSA SMS Virtual Chat Consultation

Name	Peter Browning
Job Title	Compliance Manager
Company	Cellcast UK Ltd
Contact	

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential?	NO
Your response: Please indicate how much of your response you want to keep confidential	PLEASE REDACT THE YELLOW HIGHLIGHTED SECTIONS
For confidential responses, can the PSA refer to the contents of your response in any statement or other publication? Your identity will remain confidential.	YES, as long s no specifics are mentioned.

Q1. Do you agree with our analysis of the costs and benefits associated with the different options
Are there any other factors that need to be considered?

After discussing with other parties within the industry, we believe that the costs and benefits associated with the necessary development changes needed in order to comply with the proposed changes would not be proportionate. Specifically, the receipt after a 24 hour period for not reaching a £10.00 receipt threshold.

A break down of the work needed and associated estimated costs are listed below and we believe these to be disproportionate:





Q2. Do you agree that the preferred option provides consumers with the ability to monitor and control their spend at least equivalent to the option of strict adherence to Requirement 3.2.12?

We believe strongly that due to the discreet nature of the services we provide that our customer base would not in any way welcome any receipting which goes beyond the £10.00 receipt. We have

seen evidence of this via our own customer service desk.

In the past 12 months we have received 12 complaints from customers regarding Virtual Chat services with the outcomes broken down below:

Due to the very fluid nature of SMS Virtual Chat it is our belief that sending a receipt after 24 hours of user activity would confuse the user. SMS Virtual Chat (unlike telephone chat) is exceptionally fluid with conversations continuing over extended periods of time at the customers discretion. It is our belief that a receipt after 24 hours of inactivity would confuse the customer into believing the chat had ended and therefore have negative effects on further interactivity.

Total Spend

We would further like to add that the requirement for total accrued spend within the £10 spend receipts was not something touched on previously. We have not had the time to speak with Service Providers about the work and cost involved in implementing this. We do however believe this will require extra work and cost.

We would also have concerns for scenarios where mobile numbers change owners where the cumulative spend would likely be inaccurate and inflated. We believe this will confuse users. Although we understand this is being proposed in order to allow users to track their spend so as to combat excessive use, we have not found this to be an issue with our customers. Furthermore, we feel that the ability for customers to scroll through their £10.00 receipts or call our customer service department for a breakdown of spend, would be sufficient. In the past 12 months we have had no contact from customers enquiring on their cumulative spend with these services.

Q3. Are there any other options that we should consider as an alternative to the preferred option?

Each message out is clearly signposted with the cost of service. It is our belief that this price signposting coupled with a mandatory £10.00 receipt would be in the best interests of the customer for the niche services we provide. We feel strongly that further receipting would be:

- Very difficult to implement and monitor
- Costly for the business
- Would create confusion for the customer
- Break the entertainment value in the service

Q4. We intend that providers should be able to benefit from the General Permission as soon as it is published. Is there any reason to specify a later date for the General Permission to come into effect?

No. Pending the outcome of the consultation.