

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.