

Consultation response form

Consultation on Code 15 amendments to Requirement 3.2.10 and Annex 1: Specified service charges and durations of calls

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, c/o Ofcom, Riverside House, 24 Southwark Bridge Road, London, SE1 9HA.

Full name	██████████
Contact phone number	
Representing	Organisation
Organisation name	BT
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](#).

<p>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential?</p>	<p>Delete as appropriate:</p>
<p>Your response: Please indicate how much of your response you want to keep confidential.</p>	<p>Delete as appropriate:</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.

BT response:

We are grateful for the opportunity to comment on PSA's proposals for ICSS services. As we have stated in our previous responses on this issue, we agree that intervention is needed in this space to protect customers. For many of the ICSS services we see, there is little tangible benefit to the customer calling them. There are often high price points to call these numbers and it isn't always clear to a customer that the service is an ICSS and not the actual customer care line for the company they are looking for. This is particularly difficult if customers are searching Google for a number on their phone. We believe these proposed measures will go some way to provide customers with the transparency they need to make an informed decision on whether to continue with the service.

We had previously noted that a strong enforcement regime is required for ICSS, we note that the PSA has recently fined a non-compliant services¹ and we welcome further intervention where services are found to be non-compliant. We also welcome the PSA's recent compliance update for ICSS providers.² We'd also recommend the PSA (or Ofcom after the transition is complete) make it clear how it intends to increase consumer awareness that they are the regulator to complain to about these services so that effective enforcement can continue.

¹ [Tribunal minutes Heidi Corkhill trading as Call Support 185532 f.pdf, https://psauthority.org.uk/regulatory-decisions/adjudications-search/adjudications/2023/april/connect-you-limited](https://psauthority.org.uk/regulatory-decisions/adjudications-search/adjudications/2023/april/connect-you-limited)

² <https://psauthority.org.uk/news/compliance-updates/2023/april/icss-compliance-update>

Consultation questions	Your response
Q1. Do you agree with our proposal to require a positive opt-in prior to connection by the ICSS provider to the sought organisation?	Yes – we agree that a positive opt-in would be helpful. This gives customers the chance to pause and reflect on whether to continue the call and gives ICSS providers a way to demonstrate that the customer has provided consent to the call.
Q2. Do you agree with the information that we propose be required to be included in the consumer alert prior to opt-in to ensure transparency and consumer awareness?	<p>Yes – we agree this information would be useful for customers. We would suggest that the PSA also requires that where providers are sending two follow up SMSs, the total cost is included in the alert. However the alert should be as short as possible to avoid customers spending money unnecessarily to hear the full set of information (in the event the first minute isn't free).</p> <p>Separately, we welcome the recent PSA guidance on avoiding sending more than one chargeable follow-up SMS where there is no added value for the customer.</p>
Q3. Do you have any information that would inform our assessment of the impact and especially the financial costs and benefits of our proposals in relation to Requirement 3.2.10?	N/A
Q4. We welcome input on whether there are any other measures that could support consumer understanding of ICSS. We would like to understand if all network operators are able to provide free pre-call announcements and whether these can be applied to specific service types. It would also be helpful to understand what other technology is available to support free alerts upon connection to ICSS.	<p>We do not have the technology available today to provide free pre-call announcement for these services. It is also unclear how this could ever be applied only to one type of service within a number range, historically pre-call announcements were applied to all numbers within that range.</p> <p>The PSA will be aware of the industry proposal to create new service charge price points which will have the first minute free. We are supportive of the Industry initiative and we urge the PSA and Ofcom to provide support for this initiative to work.</p> <p>See above re our comments on improving consumer awareness.</p>

<p>Q5. Do you agree with us that it is appropriate and proportionate to cap the service charge of all ICSS calls at £40? Should a lower figure be considered?</p>	<p>£40 cap does align with the existing PSD2 cap and caps set by the PSA for other service types and will go some way to prevent customer harm for those customers who are spending excessively on these services. However as the PSA points out, it would take a customer 11 minutes to reach this cap and therefore only a small number of calls would be impacted by the capping at £40. Given the evidence, we'd like to understand from the data the PSA has gathered, how a lower figure i.e £30 would impact the number of calls that would be cut off at the cap.</p>
<p>Q6. Do you agree that consumers should be informed before onward connection that calls will be terminated once a maximum charge of £40 (inclusive of VAT) is reached?</p>	<p>We support this measure which will ensure that customers are not unsuspectedly cut off and need to re-dial and incur more charges.</p>
<p>Q7. Do you have any information that would further inform our analysis of the costs and benefits of our proposals in respect of caps on service charges?</p>	<p>N/A</p>

Submit your response

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