

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.

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|----------------------|---------------------------------------|
| Full name | ██████████ |
| Contact phone number | ██████████ |
| Representing | Members with an interest in this area |
| Organisation name | TUFF |
| 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](#).

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| <p>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential?</p> | Name |
| <p>Your response: Please indicate how much of your response you want to keep confidential.</p> | None |
| <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> | Yes |

Your response

Please enter your response to each of the consultation questions in the appropriate box below.

| Consultation questions | Your response |
|--|--|
| <p>Q1. Do you agree with our proposal to require a positive opt-in prior to connection by the ICSS provider to the sought organisation?</p> | <p>Yes. For Call Centres: ICSS know they are connecting to live call centres. The only exception should be when connection is provided via a 118 DQ service. If a call centre chose to operate directly, via PRS, the PSA would require callers to be protected from undue delay. PSA could allow call centres to opt out of all connections via ICSS. PSA could manage the process. ICSS companies should publish their lists of PRS numbers and which call centre numbers those PRSs connect to.</p> |
| <p>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> | <p>Yes. ICSS companies should make clear the number they are connecting the consumer to (that is what the caller is buying, rather than a generic contact number).</p> |

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| <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?</p> | <p>The problem is the ICSS PRS fixed fee element. The victim has already paid to hear these warnings.</p> |
| <p>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> | <p>Yes. ICSS companies could easily send a free SMS on connection to warn of the costs. They could start a timer and send a warning SMS after a £10 spend and every further £10 spend. These messages could be cancelled if a call ends early.</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>Yes. If no other proposals are implemented, the £40.00 cap is essential – although a lower cap, say £20.00 would provide better protection for the consumer.</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>Yes. Consumers should be warned that, because of the cut-off, their call may never reach the front of the queue.</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>Yes. Ofcom/PSA should stop ICSS using Fixed Fee charges.</p> |

Submit your response

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