

## **Response from Ian Galtin (via email)**

### General comments:

*I have recently noticed that various ICSS providers have moved from using numbers with 087 prefixes to new 084 and 03 prefixes.*

*I would hazard a guess that this is to avoid PhonepayPlus regulation.*

*Perhaps it would be appropriate to consider extending PPP regulation to all ICSS providers irrespective of what prefix they operate on?*

### Question 2: Other necessary changes to Guidance

*The document "The appropriate use of number ranges" (<http://code.phonepayplus.org.uk/the-appropriate-use-of-number-ranges.html>) is very useful. It sets out in simple language what the various number ranges are used for and some details about pricing.*

*I understand that PPP wants to remove this document. I feel that would be a mistake. I believe that, in future, you intend to refer service providers to Ofcom for this information. I have yet to find an equivalent document on the Ofcom website, or even similar information collected all in one place, that could do the job.*

*The current document needs a rewrite to express pricing details for 084, 087, 09 and 118 prefixes in terms of Service Charge and Access Charge as well as adding the extra 78xxx number range details to the mobile shortcodes section. Further amendments to the details for the 070 and 076 prefixes may well need to be made in a year or two. Ofcom is intending to review those ranges at some point.*

*In line with the Consumer Contract Regulations 2013, text such as "The general rule is that promotions for all services should effectively publicise a UK non-premium rate telephone number (such as 01, 02, 03 or 084) for customer service purposes" will need amending to state that 01, 02, 03 and 080 are acceptable and 084, 087 and 09 are not.*

*Additionally, the new version of the Broadcast Code that will come into effect on 1 July 2015 sends readers to Phonepay Plus for the definitions of CPRS and which number ranges are affected. Surely that's the stuff in the very document that you're intending to delete?*

### Question 5: Suitability of proposed guidance on Complaint Handling?

*I think that further clarification that 084 numbers are also not acceptable is needed here. Perhaps...*

*4.7 However providers of the such PRS will no longer be permitted to use an 084 number or any other 087 or other premium rate number, to receive complaints about the premium rate service.*

OR

*4.7 However providers of the such PRS will no longer be permitted to use any 084, 087 or 09 number, or any other premium rate number to receive complaints about the premium rate service.*

*Alternatively confirm the prefixes that providers are expected to use...*

*4.7 However, where providers of the such PRS offer a telephone number to receive complaints about the service this must use a number with an 01, 02, 03 or 080 prefix.*

*P.S. the words "the such" in para 4.7 and the word "0deal" at the beginning of the document appear to be typos.*

Question 15: Comments on proposed Notice of Special conditions for ICSS

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