

Dear Mr Levack

Question 1: Do you consider the proposed vulnerability guidance helpful and effective in supporting providers meet Rule 2.3.10 of the Code? Please provide an explanation to support your response.

You are assuming that providers wish to meet Rule 2.3.10 of the Code.

Question 2: Do you consider the proposed Vulnerability Guidance to be fair and proportionate? Please provide an explanation to support your response.

No.

The proposed Vulnerability Guidance is unfair to the vulnerable, and those who care for them, and disproportionately weighted in favour of those who wish to take advantage of the vulnerable.

Question 3: Is our definition of a vulnerable consumer clear? Please provide an explanation to support your response.

Yes.

Question 4: Does the explanation of unfair advantage and reasonable foresight clarify our expectations of providers? Please provide an explanation to support your response.

I don't know what your expectations of providers are.

My expectation – based on everything I know about the premium rate industry – is that they will do their best to exploit whatever opportunities they can to drain money from the pockets of the unwary and vulnerable.

There is only one measure that will protect the vulnerable from the premium rate industry:

A simple opt-out at the point of sale (for mobile phones & equivalent technology) from ALL premium rate “services”.

Of course, you will not consider this measure or even discuss why you will not consider this measure because you prefer to continue with your ~~vision~~ hallucination “that anyone can use PRS with absolute confidence”.

As this recent article illustrates <http://www.dailymail.co.uk/news/article-3580058/Thousands-hit-4-50-time-scam-Customers-facing-bills-hundreds-pounds-texts-advertising-gaming-services-pornographic-content.html>, the same companies* are using the same methods to steal money from people as they used ten year ago to steal from us <http://www.theguardian.com/money/2007/feb/16/consumeraffairs.consumerpages>.

Since this “industry” is clearly never going to be regulated we need to be able to protect ourselves, our children, and our elderly relatives from its scams.

We need a clear opt-out now!

Yours sincerely

Dr Michael A Ward