

Analyze Survey Results - Individual Results

Survey: Code of Practice consultation

Respondent Information	Custom Fields
Respondent Type:	Accessed Survey On Web
Email:	No Email Available
Began Survey On:	06/16/2010
Time Began:	11:30:01 AM
Time Spent:	15:45:30 (HH:MM:SS)
Points:	No Points Questions used in this survey.

1 Do you agree with PhonepayPlus' proposed definitions for the different parties involved in phone-paid services? If not, why not?

Agree

Other comments:

2 Do you agree with PhonepayPlus' proposals to reform our existing Guidance, and to convert Section 7 of the 11th Code into Guidance wherever possible? If not, why not?

Agree

Other Comments:

3 Do you agree with the proposed outcomes and rules? If not, please highlight any with which you disagree, and explain your reasons, providing evidence where possible.

Agree

Other comments:

4 Do you agree that the follow spending caps and thresholds, set out at Rule [2.3.12a](#), are appropriate?

All [sexual entertainment](#) services must be ended by the company providing the service when a maximum of [£30](#) per call has been spent.

Disagree

Other Comments: This limit has been in place for years and it's time that it was increased. £50 feels sensible. It's also not consistently imposed - £1.50 090 calls from mobiles often cost £2/min, but are terminated after 20 mins, so that actually costs the user £40. £2 voice short-codes - with their transparent pricing - are therefore unfairly penalised as they are terminated after 15 minutes (£30).

5 Do you agree that the follow spending caps and thresholds, set out at Rule [2.3.12b](#), are appropriate?

Services aimed at, or which should have been expected to be particularly attractive to [children](#), must be ended by the company providing the service when a maximum of [£3](#), or in the case of a subscription service a maximum of [£3 per month](#), has been spent.

Agree

Other Comments:

6 A new Rule, [2.3.12c](#), says providers of [Virtual chat](#) services must remind customers every time they have spent [£10](#), stating that they have spent £10, rather than just repeating the cost of the service, and obtaining reaffirmation of the customer's original decision to use the service before continuing. This must be separate from the customer's interaction with the service itself, i.e., not within the text of a chat message.

Disagree

Other Comments: This should be a higher limit. We run no virtual chat services, so this is a selfless remark!

7 Do you agree that the follow spending caps and thresholds, set out at Rule [2.3.12d](#), are appropriate?

Other [subscription service](#) customers must be reminded what they are paying every month or every time they have spent [£20](#).

Agree

Other Comments:

8 Do you agree with the proposals around due diligence, risk assessment, and control (pares [3.1.1a](#), [3.1.7](#), and [3.3.1](#))? If not, why not

Agree

Other Comments:

9 Do you agree that 087 services should be exempt from the requirement to register? If not, why not?

Agree

Other Comments:

10 Do you have a view on whether breaches from the 11th edition of the Code should be matched across to the proposed registration database, and/or how this could be best achieved? If so, please provide it, along with any supporting evidence.

11 Do you agree with the proposed requirement for all parties who are defined as Networks, Level 1 or Level 2 providers to register with PhonepayPlus, and the rules of the registration scheme in terms of sharing that information? If not, why not?

Agree

Other Comments: Definition of 'affiliates' (which are not required to register) needs to be clearer, as this is a potential grey area.

12 Do you have a view on whether open investigations against Level 2 providers should be flagged to other parties registered with PhonepayPlus? If so, please provide it, along with any evidence or reasoning.

All networks and level 1 providers should have visibility of all level 2 investigations. This prevents dubious level 2s from 'round robbing' all the level 1s collecting fines.

13 What do you consider to be an appropriate fee for registration? Do you agree that the Registration Scheme should be funded by fees, or should its cost be incorporated into the general industry levy that funds PRS regulation?

Level 2 fee should be no more than £100 - we don't want to disincentivise new entrants to the market.

14 Do you agree with the proposed requirement that Level 2 providers register all their services with PhonepayPlus? If not, why not?

Agree

Other Comments: Onus should be on the level 2 to register, not the level 1.

15 Do you agree with the proposed investigation procedures? If not, why not?

Agree

Other Comments: We all make mistakes, and it's important to clearly incentivise all parties to come clean where mistakes are made (ie. provide a level of confidence that fines will not be imposed provided that it was clearly an accident, consumers have been contacted / refunded where appropriate and measures have been taken to prevent future occurrences).

16 Do you agree with the proposals around sanctions and refunds? If not, why not?

Agree

Additional Comments:

17 Please provide us with the following information

Your name: Will Neale

Name of your organisation if applicable: Orca Digital (formerly D2see)

18 PhonepayPlus publishes all responses to its consultations unless respondents request confidentiality. Are you content for your response to be published?

Yes

19 We are interested to know which of our stakeholder groups you fit into:

Industry member – Service Provider/Aggregator

20 We would also be interested to know where you heard about our new Code consultation online survey:

Word of mouth