

BT

Summary

We recognise the need for this industry sector to be able to operate profitably and without undue impediment; but we are concerned about potential detriment to consumers and the impact on the level of consumer complaints and enquiries. In BT's case, the impact could be high owing to the amount of fixed line customers we have.

When Multi-Party Chat lines were withdrawn in 1992, it was for good reason. As well as the issues of unauthorised use and caller addiction, there were questions about the safety of callers – particularly the young and the vulnerable. Whilst industry and technology has moved on, BT feels these fundamental risks remain.

Question 1

Do you agree with the proposals around the Consumer Information and confirmation of bill-payer permission condition?

We accept much of the logic outlined in the consultation, however we believe there is value in retaining the questions on bill payer permission and address detail confirmation. Asking these questions is an intervention that might encourage an unauthorised caller to go no further as it does present a pause for thought moment as well as a reminder that a charge is being incurred which will appear on a phone bill. It is in everyone's interest to have processes that reduce consumer dis-satisfaction and avoid bill-shock.

Maintaining the questions will also help demonstrate the originator's and SP's commitment to ensuring the validity of the callers, which will aid in resolving any subsequent dispute.

An option might be that callers should be asked whether they are calling from a land line or a mobile. If the caller answers with the latter, then there is less need to check for bill payer's permission or address; if it is the former, then callers should still be asked to confirm that they have the bill payer's permission and their address.

Question 2

Do you agree with the proposed changes for the introduction message?

We agree, there is also opportunity here for PPP to oblige SPs to include their non-PRS customer service number. That would support the new complaint

handling process within section 2.6 of the draft 12th code.

Question 3

Should higher tariffs up to £1.50 per minute be permitted?

We have no objection to this, provided we maintain the safeguard questions as per Q1, as the higher tariff is likely to lead to even higher phone bills.

Question 4

Do you agree with the proposal around the content of MPCs?

BT agrees that, if adults wish to take part in adult services, they should not be restricted from doing so, provided adequate safeguards are in place as previously mentioned but with the addition of an age verification question. There would also be a need for PPP's own monitoring of services to be increased, at least for the short term, to check that a reasonable level of compliance was being achieved by MPC SPs.

Question 5

Do you agree with the proposed change around monitoring?

A ratio of one moderator to 40 callers is too low. Monitoring a percentage of callers would be more effective as that takes account of the variation in caller volumes different SPs carry.

Question 6

Should the maximum call spend remain at £30?

Yes, even given the potential increase from 60ppm to £1.50 the ultimate safeguard is limiting total spend. However, currently these rates are based on BT landline prices as no SP can know what any given Originator might charge. For the time it takes a caller to incur £30 on BT rates a non-BT caller could have incurred £50. Therefore PPP will have to address the price transparency question before it can achieve effective call spend measures.

Question 7

Should the call cost warnings remain unchanged?

Yes, though again we have the issue as mentioned in Q6.

Question 8

Do you agree with the proposals around single services?

Yes, given adequate warnings to avoid mis-use and effective monitoring as per Q5 above.

Question 9

Do you agree with the proposal to allow MPCs to operate on prefixes other than the 09059 prefix?

Yes, other ranges will have to be identified for MPCs but the overall issue remains of number familiarity. Again this will be influenced by Ofcom's NTS review and firmer arrangements around the number plan. That is not to say that we would wish to see existing services being forced to migrate to any given range, but that the longer term solution is for consumer clarity around what services and prices they can expect on any given range.

Question 10

Should the age limit for MPC callers remain as 18 and over?

Yes.

Question 11

Do you have any suggestions or comments on additional conditions you feel should be imposed or considered by the Tribunal?

No, in the event of any problems currently outpayment can be suspended at short notice, PPP can apply the emergency procedure and direct the Terminator to suspend service. That is a sufficient safeguard.

Question 12

Do you agree with the proposal to remove the compensation fund and just have a security bond?

This does not impact on BT as a Service Provider but for the benefit of our customers who use these services we would want adequate “back-up” funding should there be a need to refund or make other payment to consumers who have been subject to loss or grievance as a result of a breach of the Code.

END.