

Mark Collins
Head of Industry Affairs
PhonepayPlus
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By email: mcollins@phonepayplus.org.uk

17 January 2011

Dear Mark Collins,

Channel 4 welcomes the opportunity to respond to this consultation on the Guidance to support the new PhonepayPlus Code of Practice.

Our response takes into consideration discussions that we have had with AIME and we would concur with the views expressed by AIME in their response to this consultation, specifically those that relate to our particular area of expertise and involvement. These are namely the following;

Definitions of those involved in providing PRS

The Level 2 provider is not always responsible for the operation of the services and therefore does not always control the service. In this instance it would not be appropriate for the Level 2 provider to take full responsibility and be held accountable for the service.

Promotions and promotional material (including pricing information)

We note that 5.7.5 of the 11th Code of Practice exempts services costing no more than 50p from pricing information. This is not included in the 12th Code of Practice. Please can you clarify this omission.

Competitions and other games with prizes

This is a very complex legal area, on which the Gambling Commission provides detailed advice. We believe that the PhonepayPlus guidance should simply refer people to the Gambling Commission for further information on the rules that apply to competitions.

In addition to the above, we have the following comment:

Collectively Channel 4, BBC, Five and ITV have agreed on specific wording for pricing information for premium rate services;

Calls cost XXp from a BT landline. Calls from other networks may vary and from mobiles will cost considerably more.

This wording has been used consistently by all television networks for a number of years now. We would like for all broadcasters to be able to continue to use this form of words, as we believe television audiences understand it and changing it may well lead to a degree of confusion in viewers' minds

If you require clarification on any part of our response then please do not hesitate to contact Holly Fairweather or Neil Pepin on 0207 396 4444.

Regards,

Holly Fairweather
Audience Interaction Manager
Channel 4 Television