

## Consultation response relating to SKIP function

Thanks again for the additional time for us to respond.

We have a couple of comments and questions for you regarding two of the change points PhonepayPlus are proposing. I have highlighted these in yellow.

Point 2 ii appears to contradict Point 4. Can you clarify that the only way to exit following an initial sign-up (for example; in month 3) is by text (STOP)?

RE: Point 5

We believe there is no evidential subscriber data that an additional step might be required. We believe there no grey area as to whether someone wishes to SKIP or STOP, or do nothing i.e. continue contributing. Since 2011 we have not received any queries related to this (or charity concerns) and anecdotal evidence actually suggests that supporters want to give at intervals they choose and are in control of. If this means SKIP and give in a period 4 then this is what they want to do. Introducing another step would likely have a negative impact for the charity.

We see no consumer benefit related to Point 5. A supporter (that has skipped 3 consecutive months following sign-up) would have received at least 10 messages, each giving clear instruction on how to manage their monthly gift options. We believe by introducing a further messaging process is unnecessary and potentially confusing. Should confusion play a part - it might also have a negative impact for a charity who has invested heavily in acquiring the supporter.

The PPP report states that very few supporters contacted the organisation and it seems all were swiftly and successfully dealt with. We believe there is no need to introduce a further opt-in related to this Point or anything similar that might also be proposed.

Best wishes,

Cymba Integrated Solutions Ltd

### Relevant extracts

1.8 In deciding to propose a permanent dis-application for all PRS-based charitable donation service providers, PhonepayPlus is required by paragraph 3.10.4(b) of the Code to publicly consult on a Statement of Application, which sets out how the objectives of the Code will be achieved by other means, and the conditions which will prevent consumer harm. In accordance with paragraph 3.10.4(b) of the Code, this consultation sets out PhonepayPlus' consideration and proposals. In proposing that the dis-applications within the current pilot be made permanent, PhonepayPlus proposes conditions around the following areas:

1. Requirements for all services to be run by registered charities, and to operate on specified 7-series shortcodes
2. Requirements around the transparency of promotional material, and a requirement to send consumers an initiation text message upon signing up, which must contain the following:
  - i. Information that the text is free
  - ii. STOP information which must read "to unsubscribe text STOP to [insert shortcode] at any time or call [insert number]"
  - iii. SKIP information which reads "to miss a gift text SKIP to [insert shortcode]"

3. Requirement that only the keyword SKIP is used to facilitate the skipping of a month's payment
4. Requirement that the STOP command is available at all times, and that no alternative method of exit to STOP is used
5. Requirement that consumers who text SKIP in 3 consecutive months must be immediately given the option to stop or continue, and be unsubscribed if they do not positively respond within 24 hours.