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**Code of Practice (12th Edition) Review  
PhonepayPlus Call for Input**

**Submission by  
Association for Interactive Media and Entertainment  
(AIME)**

## **AIME ([www.aimelink.org](http://www.aimelink.org))**

AIME is the UK based trade organisation representing the commercial interests of member companies involved in the interactive media and entertainment Industry - where consumers interact or engage with services across converged media platforms, and pay for those services or content using a variety of micropayment technologies.

We uphold our Code of Ethics and Core Values to create an environment of consumer trust and industry confidence within which our members' commerce can grow. We are committed to furthering the interests of Interactive Media and Entertainment through the regular exchange of information and communication throughout the value chain, effective engagement with regulators and legislators and the presentation of a successful industry image to media.

We are the only UK trade association with membership across all elements of the interactive media and entertainment value chain, which is generally supported by Premium Rate Service (PRS) billing facilities, and our membership, represents in excess of 80% of annual industry revenues.

AIME promotes and abides by the philosophy that consumers who are accurately and openly informed of the nature, content and cost of participation in an interactive service experience are perfectly placed to exercise their freedom of choice and thereby enjoy the most effective form of consumer protection.

### **Member Input**

AIME welcomes the opportunity to respond to PhonepayPlus Call for Input to the proposed review of the 12<sup>th</sup> Code. The Code has been operational since September 2011 allowing a sufficient period for the effectiveness of the new principles based approach to be assessed as well as the in-flight operational implementation of the Code.

To assist AIME in providing a comprehensive input to PhonepayPlus, AIME researched its Members in the following manner;

- On-Line Survey
- One-to-one discussions
- Written responses

AIME Members who operate in the PRS markets are broadly split into four categories although there is some overlap inside individual Member businesses.

- Fixed Line Networks, Fixed L1 and L2 providers
- Broadcasters
- Mobile Networks, Mobile L1 and L2 providers
- Support companies

AIME received responses from Fixed Line and Mobile PRS Members, with the largest quantity of responses coming from the Mobile community. As the Mobile PRS arena, is on the leading

edge of innovation and is experiencing a significant adoption of smart phone technology by consumers, the impact and progress of PRS regulation is felt greatest by this community.

The AIME response to PhonepayPlus is as comprehensive as possible for the proposed Code developments that can have an effect on the Fixed Line and Broadcast PRS Members, but due to the quantity of input from the Mobile PRS Members, there will be some bias towards this sector.

Some of AIMEs larger Members will input their requirements directly to PhonepayPlus through their regulatory staff or regulatory representatives as well as discussing their input with AIME. Outside of these parties, AIMEs Members rely on AIME to either reflect their opinions with a consolidated response or are satisfied that AIME represents their interests.

Our response is made up predominantly from Members input and some views that may be expressed are not necessarily those of the AIME Executive or AIME Board.

AIME members represent approximately 80% of the UK premium rate annual revenue.

Breakdown of AIME member responses:

- Responses from Members totalled 41 and represent 51% of Member Companies.
- 62% of responses came from Members who are exclusively Mobile
- 14% of responses came from Members who are exclusively Fixed Line
- 9% of responses came from Membership operating in both Mobile and Fixed line areas
- 15% of responses came from Members who provide services to the above Members

## General

Outcome based regulation was adopted to enable flexibility and technical neutrality in a fast moving sector and we believe that the new Code has been successful in these aims. AIME has fully supported these principles and we have worked very closely with PhonepayPlus board members, senior managers and executive staff to ensure that principles based regulation is successfully implemented for both consumers and Members.

The principles based approach is most effective when supported by clear guidance, thus removing ambiguity surrounding interpretation. Implementation of the Code and the operational environment is gradually developing a body of adjudicated outcomes that are central to the process of scoping and defining these principles. Supported by a disciplined adherence to case precedents by the Tribunal, the Code will continue to mature over time to provide a firm foundation for services to evolve.

To enable new service formats to be trialled and to encourage market investment, providers must have reasonable confidence to assess and manage risk. New services have the potential for unintentional Code breaches to occur, or for new untested situations to arise, particularly as consumers usage of technology gets increasingly complex. It is important that new situations are handled proportionately and with pragmatism to provide the necessary environment for market growth while protecting consumers. AIME can promote to its members, greater use of a voluntary audit facility with PPP where there are concerns.

Providers of leading edge services and operating in good faith would benefit from greater assurance that genuine errors will be met with a culture of understanding, supported by dialogue to improve services, their promotion and to remedy issues. AIMEs position, through its broad membership, can aid PhonepayPlus to understand new services and how to allow for innovation for the benefit of consumers without causing harm or for consumer education and information to be improved.

While the majority of consumer issues are handled through the Informal and Track 1 procedures, (and this is working well), some Members are concerned about the recent Tribunal trends:

- the apparent lack of available mitigation; and
- sanctions for issues that are generated by parties that are remote from the providers' direct technical and contractual control;

Some Members have advised AIME that they feel that they are operating in an environment that poses a high degree of risk to their business. This perception is having an adverse market impact with a reported decline in advertising spend, reduction in consumer choice and reduction in market revenues.

AIME is discussing Member concerns with PhonepayPlus but can confirm that currently Members do not support an extension of sanctioning powers to the Executive per se without detailed understanding of the situations when this would be deployed, any consequential changes to the Tribunal and Track 2 structure that would be necessary to accommodate these

new powers,, access to a 'fair' appeal process and the benefit that the PRS industry might gain from this proposal.

AIME welcomes the opportunity to review the recent investigations and adjudications to ensure that the learning from this are incorporated in a Code update.

## **Code Structure**

The structure of the Code, its drafting and the support of Guidance and Compliance documents is not generally felt to be requiring any substantive change. Reserving fines for cases of deliberate malpractice or negligence, delegating issues that are outside of direct PRS regulation to other UK authorities and improving mechanisms to bring issues immediately to the attention of providers are felt (by Members) to be more central to supporting the effectiveness of PRS regulation and its implementation.

## **Spend Caps**

By their nature, certain elements of the Code will continue to require regular review. AIME is pleased to see spend caps being considered as part of this review. AIME Members strongly support an increase across all service types, which we see as imperative to PRS competing against other consumer spending mechanisms that do not have capping. We believe that to help future proof the Code, the caps could be held within an appendix enabling greater flexibility to amend these as market conditions and economics demand.

Further scope for providers to introduce alternative consumer protection measures to spend caps should also be considered as part of the Code review.

## **PhonepayPlus Questions**

### **Q.1: Do you agree with our overall approach to this Code review? If not, why not?**

AIME is supportive of the approach being taken. Many Members have found the workshop sessions useful and we will continue to provide a connection between Members and PhonepayPlus as the consultation process develops.

Some Members have reported to AIME that there are certain views and opinions that they feel should be routed through their trade body so that their opinions can be consolidated to improve representation but also to provide anonymity. Some of these providers may not feedback directly to PhonepayPlus and are comfortable with AIMEs consolidation.

Members have expressed concerns and views over some areas of the implementation of the Code within PhonepayPlus either through direct experience or through published information. While these views have not been directly solicited as part of the response request for the Code Review, AIME feels that it is appropriate to take this opportunity, while reviewing the Code and PhonepayPlus procedures, to share Member concerns to provide a foundation for continued debate. Expressed concerns centre on Code implementation, transparency and proportionality.

### **Q.2. Is there anything else we should be considering?**

AIME Members have requested greater transparency from PhonepayPlus in its decision making and policy setting. While PhonepayPlus has continued to provide transparency around regulatory process, improved transparency of these key parts would improve industry confidence and improve business surety. This will help to achieve the objective we discussed earlier regarding Members being able to manage their business effectively, knowing all the risks. AIME works with PhonepayPlus through the ILP and can (and has) input suggestions on improving transparency through ILP and AIMEs quarterly senior manager meetings with PhonepayPlus.

### **Q.3. Have we considered all implications of Ofcom's proposed NGCS changes on the Code of Practice? If no, please detail what we may have overlooked.**

AIME is of the view that Price Charge Controls and proposals around higher rate tariffs should be decoupled from the NGCS project, which is subject to uncertainty over implementation timescales.

In the short term, PhonepayPlus can gain insight into the effect of proposed changes to Price Charge Controls by collaborating with the AIME sponsored trials on higher rate PRS and the emerging businesses of Voice Short Code services that improve price transparency.

Ofcom has raised no consumer protection concerns regarding AIME's proposal and its viability appears subject only to agreeing sufficient resource. A trial environment would demand little resource commitment. Members would welcome PhonepayPlus assisting to expedite the trial proposals.

**Q.4. In light of new service charge caps being introduced on the 09 number range, what views and evidence do you have around the application and level of spending caps to certain PRS services to protect consumers?**

AIME has previously provided evidence to PhonepayPlus that correlates the difference between consumer spending habits across different payment types, specifically for psychic services ("Business Case- Raising the £30 call cap for psychic service" and "Further Data on Psychic Usage by Credit Card")

We are informed that there is also equal propensity for some consumers to spend higher amounts for other content types.

AIME has not been able to source a co-provisioned (PRS and Credit Card) environment for a directly comparative study, though there is empirical evidence on Internet based services of higher credit card spending on a similar genre of products.

Members have also pointed to the potential for services, such as Charity donations, to innovate new service formats if a fuller range of payment options become available.

**Impact of Inflation**

It is appropriate to note that for 16 years, margins have been squeezed, as inflation has eroded the real terms spending on services. The website 'This Is Money' (<http://www.thisismoney.co.uk/money/bills/article-1633409/Historic-inflation-calculator-value-money-changed-1900.html>) has an inflation calculator which indicates that £30 in 1997 is worth £46 today.

Pressure on margins has been most evident in relation to the Ofcom controlled per minute charge controls, though the PhonepayPlus-set total call spend cap has also impacted services. Given the statement in Ofcom's NGCS consultation that they see no need for additional protections for higher charges, we believe the level of the caps should also be increased.

During this period, the previous dominance of the PRS spending mechanism for live call services has shrunk and now accounts for only 40% of overall spend today. Inflation is not the only consideration and any increase should also allow scope for services to innovate, so as to compete on a level with other payment types.

**PRS vs. Other Payment Types**

Aside from high individually set total credit limits by the card issuer, no spend restrictions exist on a consumer's credit card purchases (although fraud detection is enhanced). For debit cards, consumers are limited only by their account balance and in some cases, daily withdrawal limits. This is the accepted standard in commercial environments, with nothing to suggest a need for intervention to limit a consumer's consumption.

For PRS, we view achieving pricing transparency as the only reason for potential regulatory intervention, providing age verification has been undertaken. Providing the consumer actively uses a mechanism to keep track of their spending, in principle there should be no need for spend caps at all, other than any account based limits set by the originating Telecom Networks who carry the financial risk of a consumer defaulting on payment. However, Members are generally of the view that some level of spend cap may be desirable, to prevent consumer led fraud, providing caps are set at a level that does not constrain general service usage.

If, in the future, possibly due to EU proposals, a mechanism exists for consumers to limit their own spending, this should be favoured over a universally set spend cap.

### **Appropriate Protection Measures**

Where a consumer has been age verified then attention should shift away from limiting total spend and instead turn to how spend reminders can best function. We acknowledge that the open-ended nature of PRS transactions may necessitate additional measures to clearly communicate spending milestones. Periodic spend reminders are already in place and appear adequate, although Members would be happy to review these as an additional consumer protection measure if increasing consumer spend is demonstrated to warrant this.

In the presence of an auditable mechanism for an adult consumer to positively consent to extend charging on clear terms, regulation should not hamper a consumers enjoyment of a service or force consumers into additional charging to in order to pick up from the point that they were terminated.

### **Content Specific Regulation**

Content should still meet reasonable standards though these standards remain separate and distinct from the choice of payment used. Where content quality is called into question, it must be assessed against the same rules, standards and burdens of proof as would be applied in any consumer transaction. Sanctions and penalties must not exceed those that would be applied in the case of the same content or service having been billed by an alternative payment type to achieve proportionality.

We note PhonepayPlus concerns around “addiction” with sexual entertainment and live services and your linkage with gambling product addiction and in our Members experience, we do not have any evidence that supports the similarities suggested. Gambling addiction is well recognised and tends to come from the desire to recoup losses from potential winnings, whereas sexual and psychic services are more related to entertainment. AIME would welcome the proposed PhonepayPlus research scope be extended to inform all parties involved in these services.

### **Q5. Are there areas or provisions within the Code that are not fit for new market innovations and emerging trends that we have not identified in this document?**

AIME Members are of the view that certain services under investigation may need to be referred to other regulators or law enforcement agencies, for example the CPA or the OFT. This will provide the appropriate resources to the service, fraud or malware issue and provide a uniform approach to interpretation and enforcement.

This approach does not belittle the important role of PhonepayPlus as a sector expert, nor should it remove direct enforcement powers for the matters that are specific to the PRS payment mechanism.

**Q6. Do you agree with our overall approach to continue to make the Code even less prescriptive and increasingly outcomes-based? Do you agree with our approach to the issues we have identified?**

AIME Members believe that a less prescriptive, principles or outcome based Code remains appropriate for the regulation of a fast moving, innovative sector. In order to be successful, this must remain tethered to the same principles that have accompanied the development of general law.

We would welcome changes in the Code that acknowledge, in this increasingly Internet enabled telephony environment, that there are individuals and organisations that are beyond the control of the provider or promoter of services, but that can affect the service or the consumer accessing the service.

An amendment to the beginning of the code “A provider is expected to make all reasonable endeavours to fulfil the principles and rules of the code” would enable greater surety for companies who are dependent on the Internet for the provision and promotion of their services.

### **Complaint Handling**

We would support removing elements of prescription from the Code and replacing these with guidance. For example, we agree that allowing customer service contact facilities that are appropriate for the customers’ circumstances or technology would be better than mandating a specific customer service route. We note that provision has already been made for digital customer service on a digitally consumed service and providing this support structure can have the same or better outcome than audio support, AIME supports the proposal.

We agree the Code should achieve the objective of informing users as to how to obtain support or redress. Members would like to see all members of the PRS industry and PhonepayPlus working together to ensure that consumer support is present, efficient and effective.

### **Registration**

AIME supports the continuation of the ability to exempt certain classes of PRS regulated companies from the need to register and would welcome a review of the current exemptions and inclusions to ascertain if they are still appropriate.

Members do not see the necessity for individual companies or individuals inside a category to be exempted as the cost burden of registration is not significant and individual exemptions may create an unfair advantage.

### **Other Issues**

It is right that the Code remains platform and technology agnostic.

Members have already expressed to PhonepayPlus, through AIME, concerns over the current regulatory approach towards services that utilise affiliate marketing. AIME agrees that issues such as these can be addressed without Code review, specifically through a collaborative approach with PhonepayPlus and other bodies, rather than expanding the PRS regulatory remit.

### **PRS usage by children**

We fully support the need to protect children from harm and a separate spending cap is one potential solution. AIME is concerned that children's accessibility to services that are designed for an adult audience or designed for a general audience but can incur high costs, is increasing mainly due to parents passing contract mobile handsets to their children without any spending or access controls being applied.

This will have the effect of putting the providers in the uneasy position of technical code breaches without intent and some reported recent examples of excessive child usage of Apps on parents App store accounts highlights the potential for issues.

Members, whose businesses exist in these areas of concern, would welcome detailed discussions to be held with relevant parties on both the supply (apps etc) and consumption (consumer protection agencies) side including PhonepayPlus to ascertain how industry and agencies can work together to improve child protection environment and parental knowledge and controls.

### **Q 7. Do you agree with our proposal to review the Track 1 and Track 2 procedures? Do you have any further suggestions as to how PhonepayPlus might amend them to reflect current usage, ensure consumer protection and optimise the principle of polluter pays?**

AIME fully supports a review of the procedures, in particular the Track 2 and will supply full assistance to PhonepayPlus in this review with industry knowledge and expertise. Where the proposals improve transparency and deliver proportionate and effective regulation, AIME is fully supportive. Our further suggestions are detailed below.

We believe that enforcement is central to this ethos and should focus on the prevention of future harm through swift regulatory intervention to amend or curtail the service in question. Wherever possible, particularly where there is low evidence of intent should be through dialogue with the provider using the informal procedure and Track 1 procedure.

AIME is pleased to see that PhonepayPlus has deployed these procedures in a majority of situations with the PRS industry and welcome continuation, with refinement aided by industry feedback.

AIME welcomes the proposal to improve the timetable between launching an investigation and taking the information to Tribunal, if felt necessary, on the understanding that the improved timescales would not prevent the provider from assembling an adequate response to a breach letter. The alleged harm can be dealt with swiftly by the provider while they are given adequate opportunity to prepare an effective defence to the allegations.

Currently, the majority of Members who responded stated that they do not support the Executive having direct sanction powers. The perception regarding 'sanction powers' is that of punitive ability, however, it may be that the Executive perceive the powers to be along the lines of 'settlement'. This may be welcomed. Clearly more clarity over the situations that could be handled in this manner, the assessment criteria and scope of authority is needed in order to gain more understanding and support.

Similarly, the principle of a single member Tribunal is acknowledged to improve efficiency and reduce costs, though this has not gained majority Member support without detailed discussion taking place as to appeal rights etc. It is imperative that the transparency of this proposed revision to procedures is gained through detailed discussions with potentially affected parties.

AIME is of the view that a published "Triage" system that takes into consideration, intent, actual harm, revenue generated directly as a result of the breach, mitigating circumstances and other factors, would be appropriate to improve transparency.

Members speak to AIME about improving market certainty and confidence for new entrants and innovators, through visibility of the moderate and pragmatic treatment that services launched in good faith with full endeavours to comply with the Code will receive through Informal and Track 1 procedures. A published Triage system will, in our view, assist in providing this market certainty.

## **Refunds**

Members responded that, in the case of a major breach, such that it would (in consumer law) invalidate the contract with the consumer, refund requirement should be imposed. Where refunds are directed, sanctions should, other than direct administrative costs, generally be minimised to take into account the reduced revenue,

Blanket refunds should only be applied in the case of systemic failure and only to those consumers that are demonstrated through evidence to be directly impacted. Members stated the direction for imposing refunds should rest with the Tribunal and not the Executive.

## **Track 2 and Fines**

Adjudications and fines in respect of the "potential" for consumer harm are not generally supported by Members, as this potential could be negated if the issue was communicated to the provider early and the provider took the relevant steps to prevent actual consumer harm from continuing. Where there are repeating issues, indicating lack of control by the provider, then this should be the reason for reverting to the Tribunal, again using a published Triage system to assess the criteria for escalating the issue to Track 2.

Members felt strongly that innovation and drive to improve consumer services cannot take place within an environment of heavy or unpredictable risk and the opportunity to address genuine mistakes remains imperative.

Greater emphasis should be placed on whether there was evidence of intent to mislead the consumer and whether the provider took all reasonable steps to prevent a breach from

occurring. Members considered this assessment should form part of a published Triage system.

Members are concerned, as a result of reading the publications of Tribunals over the last 18 months, at the levels of fines for seemingly moderate breaches or for services where swifter Track 1 action may have prevented sustained harm. Large fines should be reserved for cases where there is fraud, wilful breach of the Code or a negligent breach of the Code. In some instances, cases may be better handled by the legal system, with direction and assistance from PhonepayPlus where appropriate.

AIME would welcome a review of the Track 2 procedure and the flow of a case from initial investigation through to final adjudication. A significant amount of effort was made with AIMEs assistance in 2011, to improve transparency of the process, but some Member concerns over the transparency of the decisions and policies that sit behind the process remain.

AIME suggests (and will assist with) a detailed analysis being performed on sample (historical) cases to ascertain how changes to processes would improve transparency and improve market confidence.

Members welcome the proposal to improve the situation for providers seeking a review of their adjudication. As the provider incurs costs in seeking a review, we do not believe that this would be open to abuse.

In limited circumstances Members also feel that it would be appropriate for new evidence to be introduced at this stage, for example where this is directly to refute new arguments, new evidence that had been presented close to the day of the Tribunal or to assist the CCP in its understanding of how the service operates, where it has become clear that the understanding does not exist. Often with technically complex services or with “robust consent to charge” requirements, independent technical expertise may be called on to assist the review.

The PhonepayPlus proposal that aims to improve the situation when a request for a tribunal review impacts the providers access to an Oral Hearing are fully supported.

Where PhonepayPlus compliance advice is given or Prior Permission is granted it remains an option for PhonepayPlus to revisit the advice or permission. Members feel that reviews could be agreed after a given period of operation or after a given level of revenue and brought forward in the event of a level of complaints.

Where a service has received full advance scrutiny, it would then be reasonable, in the event that an issue is later identified, to treat issues via Track 1, providing of course that the service has not deviated from the agreed format.

This allows for PhonepayPlus to not be bound in perpetuity to its advice, while providers could have the confidence that they can rely on the advice without undue risk.

**Q.8. Do you agree with our general approach under the enforcement and technical review theme? Do you have any comments on the areas for consideration that we have identified? Are there potential amendments that we should consider but have not? If so, please detail the issue and provide relevant information if available.**

AIME has received from Members, primarily operating in the Mobile PRS industry and in particular with Internet enabled services, concerns about investigation processes and Tribunal structure. As this system was introduced at the time of the 12<sup>th</sup> Code, AIME feels that a review of the process and structure is needed to ensure it remains independent, fair, pragmatic, proportionate and importantly, keeping pace with technological advancements particularly with mobile and Internet provided services.

This review should also examine and report on;

- Independence of the CCP and remoteness of influence by PhonepayPlus Executive and Board
- Logging of PPP Executive or Board access to and contact with CCP members
- Transparency of PPP Board meetings where Member(s) of the CCP are present
- Contemporary knowledge and skill of the CCP members with respect to modern PRS services
- Review of Legal interpretation by the Executive can be tested and challenged by the CCP
- CCP assessment of harm and mitigation where a provider has demonstrated doing their utmost to prevent a code breach

AIME would welcome and will support, as stated before, a review of the Track 2 process (and Emergency procedure criteria) to determine if improvements to process, proportionality and effective regulation can be gained.

**Q9. Do you agree with the issues we are considering as part of the polluter pays theme? Are there any areas that we have missed?**

Paragraph 5.5 mentions that the Code requires Networks to retain revenue for at least 30 days and PhonepayPlus notes that certain L1 aggregators are factoring payments to L2s and that this activity undermines the spirit of the Code.

Factoring is a business service independent of aggregation, with many companies providing this service to carefully selected clients. It is designed to assist cash-flow for L2 providers, particularly in the Mobile PRS industry where revenue share payments have been known to take up to 120 days to arrive. No L1 AIME Member provides payments in breach of the 30 day requirement of the code.

Prohibiting L1 aggregators from factoring will merely disadvantage members of the value chain for no material benefit.

We note and support the intent of the 30-day rule to ensure that refunds and sanctions can be paid and that deliberate scams do not generate profits for the practitioners, but suggest that improvements proposed by PhonepayPlus to the early investigation stages of a Track 1 or Track 2 procedure plus improved communication to trusted L1 providers will enable deliberate breaches to be caught early and money flow suspended within the 30 day period which will ensure it also falls outside of any factoring arrangements.

## Conclusion

AIME welcomes the open and consultative approach being employed by PhonepayPlus for the Review for the 12<sup>th</sup> Code and are pleased to be able to input our Members responses to help guide the full review process.

We trust that PhonepayPlus will call on our Executive and Members combined expertise to assist with the detailed reviews as proposed as this will help guide the review in the same manner that AIME assisted with the introduction of the 12<sup>th</sup> Code.

Members believe that the 12<sup>th</sup> Code is largely fit for purpose and we continue to support a principles based approach, coupled with regular updates to Guidance. We welcome the attention given to spending caps, which is an area of the Code that warrants review and we strongly advocate raising spending caps to a level that would allow PRS to compete and innovate. Further we would encourage coding of spending caps to be written as appendixes to the main Code to allow a more periodic review.

The Code's subjectivity has brought about new challenges in aligning the differing interpretations of its principles and our Member concerns now primarily relate to how the Code is administered and enforced. Review to investigation procedures and the Tribunal setup are welcomed and felt necessary, though some of the proposals put forward in the Call for Input paper are not universally supported. This industry feedback should be used as an opportunity to review perceptions of transparency and proportionality.

AIME members generally seek a framework where unintentional service issues can be addressed through the Informal or Track 1 procedure, thus fostering a spirit of open communication, swift removal of potentials for consumer harm and allowing services to innovate without regulatory risk.

## Statement of Representation

AIME confirms that this response has been compiled following a process of internal discussion and distribution of the relevant Consultation documentation to all AIME members. A list of members can be found at <http://www.aimelink.com/home/members.aspx>

The views expressed in this response are a fair representation of the majority views held by the responding AIME membership. Individual members are actively encouraged to submit their own independent views as they deem fit and at their sole discretion.

## **Close**

We assure you that, as ever, our comments are made constructively and with the intent of achieving an effective, fair and proportional regulatory regime for Premium Interactive Media and Entertainment services in the UK.

If any clarification to our response is required or if we can be of any further assistance please contact Fleur Bowles at +44 (0) 1252 711 443, or [fleur@aimelink.org](mailto:fleur@aimelink.org)

Sincerely

AIME