

From: [Cindy Aspland](#)
To: [Jonathan Levack](#)
Subject: Response to Review
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Hi Jonathan

Thanks to you and your team for the workshop event yesterday which was very interesting.

I made all of my points verbally yesterday, but I am providing a brief written outline below to certain questions as requested. Please note that I don't wish to input into areas into which my company does not operate (such as children's services), so have omitted those questions.

Q1 & Q2 – I feel strongly that PPP should reconsider their approach to registration fees for providers generating revenues below certain levels. We have a large number of small clients (1-man band operations) who generate less than £500 per annum. Making them pay a registration fee equivalent to almost 1/3 of their total revenue seems very hard to justify, especially since all providers already financially support PPP via the levy. I think that PPP needs to better understand that for many historical providers in the market, they have been hit very hard by the web (online content is free) and smart phones (often PRS calls are barred) and, as such, have seen their call volumes and revenue decline steeply over the last few years. Many are just about surviving and it would be a shame (and a scandal) if their own industry body fees were the last straw that forced them to close their business. I appreciate that this may sound overly dramatic, but PPP should be supporting these providers; the more well-run premium rate services there are, the better for the whole industry, and these small players make a valid contribution.

Q4 –As per our discussion at the workshop, I see no reason why new service charge caps should mean that new rules are introduced, such as reminders (which are very intrusive). PPP already has rules covering pricing and the handling of calls; if these are working ok, then there is no reason to change them merely because prices have been increased. In terms of maximum durations, these should be increased in line with the new price points so that callers are not forced to end a call earlier than normal. In our own experience, price increases have very little impact on call durations since the content remains the same duration. We would expect to 'lose' a certain percentage of callers (around 10-15%) when the price rises, but have found that many will resume using the service again within 6 months.

Q6 – I agree with the PPP outcomes-based approach.

Q7 – I agree with the approach generally. Smaller infringements accepted by the provider (where there is very little harm and may be termed 'mistakes') should be dealt with informally, without need for a Track 1 procedure. The provider should be given 7 days to rectify the infringement and only if they fail to comply should further action be taken. I don't think that any admin fees or fines should be levied in this instance. PPP should retain the right to go straight to a Track 1 for providers that consistently breach. Keeping costs down is a sensible priority for PPP

Best wishes
Cindy

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