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Call TV Quiz Services Review: Analysis and Consultation Document

Kingston Communications (Hull) Plc (Kingston) welcomes the opportunity to respond to the ICSTIS consultation regarding Call TV Quiz Services.

As well as being the incumbent operator in the Hull area, Kingston has significant presence in the rest of the UK where we operate under the Kingston, Affiniti and Eclipse Brands. Not only do we originate calls from consumers to Quiz TV Services but we also supply premium rate numbers to Quiz TV Service Providers, operate an IVR platform and provide support to the Quiz TV Service Providers.

We have based our comments around the questions listed in the consultation document.

Executive Summary

With the recent scrutiny that this sector of the PRS market has been under, Kingston believes this consultation is necessary and exceedingly timely. We are broadly supportive of the proposals that ICTSIS make, however we would advise that implementation of the proposals should, while being as swift as is possible, also be robust and sustainable. This is vital for the long term success of the Quiz TV sector. Consumer confidence has declined rapidly over the past few months and this needs to be addressed by a series of well considered activities to increase the availability of relevant information that would aid an informative decision to participate or not.

Kingston believes the service we are able to offer Service Providers is high spec, robust and goes above and beyond existing compliance requirements. Therefore we don't anticipate any difficulty in complying with the proposals set out by ICTSIS within the consultation.

We have based the remainder of our comments around the questions listed in the consultation document.

Q1 Do you agree that the provisions for pricing transparency should be strengthened in the way described above and as set out in the revised Statement of Expectations?

Kingston believes that the revision of the Statement of Expectations is both timely and necessary. Pricing transparency does require attention as the current requirements are open to different interpretations, the proposed revisions tighten this up, which will, in Kingston's opinion create a requirement that will help increase consumer confidence in the Quiz TV sector.

Q2 Do you agree with our assessment of Option 1?

Kingston agrees with ICTSIS in that "doing nothing" is not appropriate as it is clear that consumers don't currently have enough information in order for them to be properly informed prior to entering. While it is true that the understanding that a degree of chance is involved, the degree of chance, and the cost involved in entering, whether successful or not is not as clear as it might be.

Q3 Do you agree with our assessment of Option 2?

Publication on-screen of the actual 'chance' or 'odds' is in Kingston's experience technically feasible, and would in fact be relatively quick to implement from our perspective. However we are aware that not all suppliers of premium rate numbers to Quiz TV Service Providers would share this view. Therefore to avoid the risk of creating a technical encumbrance to other premium rate number suppliers, we agree with ICSTIS that option 2 is not the correct option to take forward.

Q4 We would welcome views, especially but not exclusively from providers, as to the best technical means and media through which this principle could be delivered and promoted with minimum disruption to the service quality and potential for consumer information overload. We would be willing to assist in this process by facilitating a working party to consider the various options.

Kingston consider that the formation of a working party in order to move forward option 3 is a welcome offer.

The technical solution to frequently update information on screen is one that Kingston already possesses and we will be contacting our customers not already benefiting from this service to ascertain if they wish to make use of it prior to the conclusion of this consultation.

However, how increased transparency should be applied across the board, in Kingston's opinion needs further discussion and we would be happy to participate in this discussions should that be appropriate.

Kingston strongly suggests that a deadline for agreement should be set, as it would be all too easy to enter into protracted discussions that go nowhere. Therefore, in Kingston's opinion it

is vitally important that any discussions are under tight governance with set deadlines and objectives.

Q5 If you do not agree with any of our assessments presented in Options 1, 2, or 3 above, what alternatives would you suggest?

Kingston believe that option 3 is the most appropriate way forward and at this time do not suggest any alternative.

Q6 Do you agree with our proposal for call warnings and are there any other suggestions as to how the possibility of excessive use by consumers may be minimised?

Kingston believes that End-Users need to take responsibility for their own actions. By furnishing them with information on when they have spent over certain amounts allows them to make their own minds up as to whether or not they should continue to make entries.

Kingston has in place processes that allow for monitoring of high charges being sustained by individuals and offer to bar access to premium rate numbers if unusually high charges have incurred. This we feel allows End-Users the responsibility for their own actions as well as makes allowance to manage End-Users that may have developed a gambling habit.

Kingston urges ICTSIS to require that warning systems should be put in place immediately so that End-Users are made aware when they have made calls at intervals of £10 spend. This will go some way to address consumer concerns regarding “Bill Shock” and help restore confidence in the Quiz TV sector.

Should you have any questions relating to this submission, please don't hesitate to contact me.

Nancy Saunders
Regulatory and Interconnect Manager