

List of consultation questions

Q1: Do you agree with our assessment in relation to the six objections that were raised to applying a prior permission regime to ICSS? If not, why not?

The only issue we have is with the time scale to get prior permission – we have already tried to apply for prior permission based on this consultation only to be told that its not in force yet.

We suggest that if you do introduce Prior Permission then that PPP understand we are running a commercial organization and as such allow the service to run while the prior permission is submitted and associated issues resolved. We do not want to be in a position where we have to shut the service down and lay staff off while PPP are going through our prior permission application.

Q2: In light of this, do you agree with our conclusion to apply a prior permission regime to ICSS, but not to full national directory enquiry (118) services? If not, why not?

We believe that prior permission should be applied to both 118 and 09. We have already contacted a couple of network operators with respect to running a small dedicated 118 service which again could be advertised on google etc. and given that we would not need prior permission for this when we would for 09 does not seem correct, if the this is trying to protect the public and force all operators to operate within the PPP code of practice.

There should not be one rule for 118 DQ services and one rule for 09 DQ services

Q3 - Do you agree with our altered definition of Information, Connection and/or Signposting Services (ICSS)? If not, what alternative would you propose?

Yes

Q4 - Do you agree with our proposals to remove the exemption for charities which we had previously proposed, but waive the requirement to pay a prior permission fee? If not, why not?

No – we do not agree with this as it would add a loop-hole to unscrupulous service providers and networks, especially given the ease with which a charity can be setup in the UK

Q5 - Do you agree with this assessment and PhonepayPlus' changes to proposed conditions around SEM? If not, why not and do you have an alternative to propose that meet our objective?

Yes

Q6 - Do you agree with this assessment and PhonepayPlus' changes to proposed conditions around promotion of ICSS? If not, why not?

Yes

Q7 - Do you agree with this assessment and PhonepayPlus' changes to proposed conditions once a consumer has dialled an ICSS? If not, why not?

We believe it is OK but could do with some modification in order to give a better user experience and further reduce their calling time and thus costs. In addition any changes should also be applied to 118 services as well in order to have clarity across the whole business sector. There should not be one rule for 118 DQ services and one rule for 09 DQ services

Q8 - Do you agree with this assessment and PhonepayPlus' changes to proposed conditions where an ICSS collects personal and/or confidential data from consumers? If not, why not?

yes

Q9 - Do you agree with the additional condition c) in respect of a requirement to only

collect information necessary for the provision of the service? If not, why not?

yes

Q10 - Do you have any further evidence on whether a bond is necessary? If so please provide it.

We do not believe that bond is a requirement as this has been primarily used for adult where there is significant possibility of the corruption of minors etc. Prior Permission alone should deter both Networks from allowing rogue services to run and from Rogue operators obtaining it.

Q11 - Do you agree with our proposal to alter the list of current exemptions from prior permission, so that 'connection services' are removed? If not, why not?

No – all services should require it. There is no reason for any service not to require prior permission.

Q12: Do you have any evidence of significant cost which ICSS providers will incur as a result of a requirement to state "premium rate connection service" or "premium rate assistance service" in SEM descriptions? If so please provide it.

No