



BT's response to PhonepayPlus consultation document

“Further Assessment of Information, Connection and Signposting Services”

22 May 2013

BT welcomes comments on the content of this document. Comments can be addressed via e-mail to Graham Pottie (graham.pottie@bt.com) or Anne McLaren (anne.mclaren@bt.com)

For the attention of
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1 Executive Summary

BT continues to strongly support PPP's aim to ensure that in the Information, Connection and/or Signposting Services market, consumers are provided with complete, accurate and relevant information about calls that they make. The actions of a small number of service providers over the past few years have brought this into question.

We note the additional research and the conclusions that PPP have come to.

Our view remains that the compliant operators in this sector must provide a service that fully meets the consumer's expectations, must not be misleading and must provide all the necessary information to enable the rational consumer to make the call knowledgeably. Compliant operators should also be able to operate a sustainable business model.

Where a consumer is – for financial, health or other reasons – unable to make a rational decision about calls to particular services, there are grounds for them being provided with more than just the information about the call and not be taken advantage of.

We agree that there is no justification for an ICSS Service Provider misrepresenting, unnecessarily prolonging a call, or seeking and handling personal information unnecessarily or non-compliantly.

2 BT's responses to 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?

A: Yes we agree with the assessment.

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?

A: Yes we agree with the conclusion.

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

A: Yes we agree with the altered definition

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?

A: Yes we agree with the proposal to remove the exemption for charities.

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?

A: Yes we agree with the assessment and proposed changes. We support the PPP conclusion that greater transparency at the SEM stage is needed and that making sure the customer is clear on the service they are getting at an early stage is key. This sits alongside the existing requirement for prominent and proximate promotion of the call charge. We propose that the website link or address for the end organisation should be defined as the homepage address.

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

A: Yes we agree with the assessment and proposed changes. Provided the customer is clear they are using an ICSS provider and a link to the organisation's website is present that should be sufficient. We propose that the website link or address for the end organisation should be defined as the homepage address.

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

A: Yes we agree with the assessment and proposed changes.

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?

A: Yes we agree with the assessment and proposed changes. We are concerned that a customer may give their password to an ICSS provider, believing them to be

the organisation. But as the measures proposed by PPP should make the identity clearer this risk should decrease.

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?

A: Yes we agree with the additional condition.

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

A: We have no further evidence.

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?

A: Yes we agree with the proposed changes. We notice that the live DQ exemption has been amended to “live full national directory enquiry services”. We understand the change reflects the changes elsewhere for ICSS but want to make sure that international DQ services will not inadvertently fall under the prior permission requirements due to the change of wording. We would welcome confirmation on this point.

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.

A: We have no evidence of this.

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