



David Levitt  
Regulatory Development Executive  
PhonepayPlus  
Clove Building  
4 Maguire Street  
London SE1 2NQ

**BY EMAIL**

5 June 2013

Dear Mr Levitt,

**Sky's response to PhonepayPlus' further assessment of Information, Connection and/or Signposting Services**

This is the response by British Sky Broadcasting Group PLC ("Sky") to PhonepayPlus' further consultation on Information, Connection and/or Signposting Services ("ICSS") dated 24 April 2013 (the "Consultation").

Background on Sky

Sky is the United Kingdom's fastest growing broadband and telephony provider. As at 31 March 2013, Sky had 4.3 million Sky Broadband customers and 4.2 million Sky Talk customers in the UK. Sky has also recently launched Sky Broadband and Sky Talk in the Republic of Ireland.

General comments

We have not responded to the specific consultation questions but we set out below our general comments on ICSS, which we hope PhonepayPlus will find useful:

1. Sky has received a high number of complaints about ICSS directly from its customers. We provided details of many of these complaints to PhonepayPlus in response to PhonepayPlus' Statement on information, connection and/or signposting services of 18 December 2012. The complaints data we provided indicated that the majority of complainants did not realise that they had not actually contacted Sky directly until receiving their telephone bill and it is the ICSS charge appearing on the bill that prompts those customers to complain. Sky believes that customer confusion is rife with regard to ICSS, as has been clearly evidenced by the results of the research that Jigsaw Research carried out on PhonepayPlus' behalf (as referred to in the Consultation).
2. Sky is in full agreement with PhonepayPlus' view that, in order to avoid the erosion of consumer trust, customers should be provided with sufficient information on ICSS, the costs associated with ICSS and the fact that customers can find the contact numbers they are looking for at no cost elsewhere.
3. Sky has particular concerns that ICSS providers could cause longer term brand damage if they are permitted to continue operating ICSS as they do currently. Sky is also concerned about the potential for hidden customer harm where our customers do not complain to us about an ICSS, but feel aggrieved all the same.

In conclusion, Sky is in full support of PhonepayPlus' proposed prior permission licensing regime.

Yours sincerely

Mark Szemelka

**Technical Compliance Analyst**