



Vodafone's response to PhonepayPlus's consultation

**"Further assessment of Information, Connection and/or
Signposting Services"**

June 2013

Vodafone welcomes Phonepayplus's further consideration of information, connection and/or signposting services ("ICSS").

We have no further comments to add to the consultation response submitted by Cable&Wireless Worldwide¹ in response to PhonepayPlus's previous consultation in October 2012.

We continue to believe that prior permission should be introduced for these services to protect users of the services from the serious harm that can be caused. We also draw PhonepayPlus' attention to the recent complaint made on behalf of one of our corporate customers as an example of the deliberately misleading nature of some of these 'services'.

However we also wish to repeat our due diligence point in the final paragraph of our previous response:

"Cable&Wireless Worldwide acknowledges the investigation PhonepayPlus has conducted into Search Engine Optimisation and the contractual arrangements which companies such as Google make with ICSS organisations. We welcome the initiative to understand such organisations in order to ensure that the proposed Prior Permission regime can work in tandem with existing contractual restrictions. This is a level of detail with which Network Operators are likely to be unfamiliar. We seek confirmation from PhonepayPlus that the due diligence, risk and control measures expected of Network Operators will relate to the existence of a Prior Permission certificate and not a disproportionate expectation of an understanding of the ICSS' utilisation of Search Engine Optimisation."

To reiterate, we seek confirmation from PhonepayPlus that the due diligence, risk and control measures expected of Network Operators will relate to the existence of a Prior Permission certificate, proportionate testing of the service and complaint monitoring only and that PPP will issue periodic guidance on best practice on how Networks/L1s can mitigate new unforeseen risks that these services may pose to consumers.

Vodafone Limited
June 2013

¹ Which is now fully integrated into Vodafone, after Vodafone acquired Cable&Wireless Worldwide in July 2012.