

Q1: Do you agree with our definition of Information, connection and/or signposting services (ICSS)? If not, what alternative would you propose?

I Agree.

Q2: Do you agree with our description of how ICSS operate? Are there other variants not covered in this section?

I Agree.

Q3: Do you agree with the distinction we are making between the connection and signposting aspects of ICSS on the one hand and directory enquiry services on the other? If not, why not?

“Offer a comprehensive range of numbers and marketed as such”

“Offer information derived from, or advice or assistance in relation to, or connection/signposting to, a specific organisation and/or helpline and marketed as such”

I Agree that directory enquiries services DO offer a comprehensive range of numbers, however disagree as our range of numbers is constantly expanding and becoming a more comprehensive service.

“The consumer has to provide information about the number they are seeking to the provider during the operation of the service”

“The consumers search for the number happens before the service is engaged (i.e. at the search engine or classified ads stage)”

I Disagree. As an ICSS 10-15% of my website visitors use the search facility to find contact information. This is a number that has been steadily growing as time has gone by, and as we have expanded our database.

“Generally have strong brand awareness with consumers”

“Have no brand awareness with consumers – indeed consumers will probably not realise that these services exist”

I Disagree with this totally. 118 118 and 118 500 are the only 2 directory enquiry services that have a strong brand awareness amongst hundreds of these service providers. I personally believe ICSS brand awareness is growing as more and more people use and return to the service.

“Use the 118 number range which is well recognised by the public as a premium rate number”

“Typically use 090 numbers which have low public awareness and consumers may not recognise as being premium rate”

Disagree. With all of the negative press surrounding 090 numbers from any TV shows with Ant & Dec hosting or Blue Peter competition lines, and the fact nearly every prime time game show or magazine show uses them for competition lines, I would think a large part of the population now knows that 090 numbers are premium rate and expensive to call seeing as millions of people every day are watching them and being educated on the cost of calls.

Q4 – Do you agree with our assessment of consumer harm in relation to ICSS? If not, why not?

I Disagree. I am aware of previous Phone Pay Plus investigations regarding the improper use of Premium Rate Numbers and these matters have been handled accordingly, however these cases predominantly are connected to 090 numbers and a lack of clear pricing.

I personally think ICSS operate on 2 different levels. 090 numbers that charge 1.53 per call or per minute, and 0871 numbers that charge 10p per minute.

The 090 numbers will cost the consumer a minimum of £1.53p on several cases. This is clearly an expensive call and can cause the consumer some harm, especially if the charge is on a per minute basis, however my experience is that with 0871 numbers, the average cost of a call is around 40p in total. My understanding of Phone Pay Plus's rules and regulations is that if the total cost of the call is under 50p it is not considered a premium rate call.

Q5 – Is there other evidence of concerns and/or harm that you are aware of and which have not been referred to in this section? If so, please provide them and any evidence that substantiates them.

No.

Q6 – Do you agree with our assessment that ICSS carry a level of risk which meets the threshold for a prior permissions regime? If not, why not?

I Agree that 090 numbers do carry this level of risk to the consumers.

I Disagree that 0871 numbers carry this level of risk to the consumer.

Q7 – Do you agree with our proposed exemptions from a requirement to seek prior permission? If not, why not?

I Agree and I also believe that 0871 numbers should be exempt from prior permission as they carry less risk than the 090 numbers.

Q8 – Do you agree with this assessment and PhonepayPlus' proposed conditions around Search Engine Marketing (SEM)? If not, why not?

I Agree. However when it comes to organic search results Google, Bing etc. are unpredictable and will show what it believes is best regardless of Meta Tags/Titles/Descriptions

Q9 – Do you agree with the need to require the inclusion of specific wording in SEM results as displayed to the consumer on-screen in search engine results that states "This is a premium rate telephone service"? If not, why not?

I Disagree. The wording space provided on SEM is too short to do this properly.

Q10 – Do you agree with this assessment and PhonepayPlus' proposed conditions around promotion of ICSS? If not, why not?

I agree mostly, apart from the condition B ii).

Q11 – Do you have any views on whether condition B ii) should be applied to all ICSS, or whether an altered condition, as outlined above, should apply only to connection and signposting services which can prove they are not used mainly by vulnerable people and link to genuinely hard to find numbers? If so, please provide them, and any evidence which supports them.

The consumer has searched online for the telephone number. If the official number was published next to the ICSS number, then you are effectively killing the ICSS business. My personal opinion is if the consumer is searching online, then the ICSS can provide a link to the official website and let them look for it there instead if they so wish to do so.

I do agree that vulnerable people should be protected from harm, and NHS numbers, debt counselling and government helplines should be regulated by a permissions regime. I also think that 118 directory enquiries businesses need to fall in line with this also.

Q12 – Do you agree with this assessment and PhonepayPlus' proposed conditions once a consumer has dialled an ICSS? If not, why not?

I Agree with most of the conditions apart from:

4.34 b) I Disagree. See Below – Question 13.

4.34 c) I Disagree. You can't pre-determine if a caller will be placed in a queue and may mislead the customer. I don't see 118 services doing this so why should ICSS?

4.34 h) I Disagree. The price of the call on the website by the number the consumer is calling should be enough.

Q13 – Do you have any views on whether condition B should be applied to all connection and signposting services, or whether an altered condition, requiring that the consumer is given the website of the organisation they are looking for rather than the actual number, should apply to connection and signposting services which can prove they are not used mainly by vulnerable people and link to genuinely hard to find numbers? If so please provide them, and any evidence which supports them.

A free message at the start of the call is not needed if the pricing information is clearly displayed on the ICSS website with a link to the official website. My view is this, if the customer can search on the web for the number, then we as an ICSS can point them in the direction to find the official number themselves, or for speed and convenience, use our ICSS number.

Q14 – Do you agree with this assessment and PhonepayPlus' proposed condition where an ICSS collects personal and/or confidential data from consumers? If not, why not?

I Agree.

Q15 – Do you have any thoughts on whether a bond is necessary? If so please provide them, and any evidence that supports them.

I think a bond payment is a good idea, however the bond payment needs to be realistic and should vary on what type of ICSS service is being provided. For example, the 090 ICSS services create a much higher risk for vulnerable people especially if the call is charged per minute. I also think that the prior permissions would also remove the need for a Bond payment.

Q16 – Do you agree with our impact assessment? If not, why not?

I Agree with the majority of the assessment, however I think that giving the official number for free, whether in a free message at the start of the call, or on the ICSS website next to the ICSS number is unfair and will kill the ICSS business. If the customer is searching on the web, then I think a message with the web address or a link on the ICSS website to the official business website can help them continue their own search. As I said before, 118 directory enquiries services are not free to call, and don't give the number out for free either, so why should the ICSS services.

I also agree however that vulnerable people should be protected and prior permissions need to be in place for NHS lines, Government Lines & Debt Management Help lines. I also think that 118 directory enquiry services also need to draw parity and not just ICSS.

I also think that the 0871 numbers pose much less risk to consumers than the 090 numbers.